CENTENNIAL
at TEJON RANCH

Centennial Project

Consolidated Final Environmental Impact Report

Volume 2

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

Lead Agency:

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

November 2018

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Los Angeles County, California

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CENTENNIAL

at TEJON RANCH

CENTER FOR
FOOD SAFETY

CALIFORNIA
NATIVE PLANT SOCIETY

August 16, 2017

Via Electronic Mail and USPS (w/exhibits and references)

Mr. Jodie Sackett
County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
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Re: Centennial Project Draft Environmental Impact Report

Dear Mr. Sackett:

These comments are submitted on behalf of the Center for Biological Diversity ("Center"), the Center for Food Safety and the California Native Plant Society regarding the Draft Environmental Impact Report ("DEIR") for the proposed Centennial Project ("Project"). The California Environmental Quality Act ("CEQA") mandated environmental review for the Project is inadequate and fails to comply with the requirements of the statute. The DEIR fails to adequately analyze a range of environmental impacts, mitigation measures, and alternatives. For the reasons detailed below, we urge that the Project be denied, or at a minimum, the DEIR must be revised and recirculated to remedy these deficiencies. F.8-1

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over one million members and online activists throughout California and the United Sates. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Los Angeles County. F.8-2

The Center for Food Safety ("CFS") is a nonprofit, public interest advocacy organization dedicated to protecting human health and the environment by curbing the proliferation of harmful food production technologies and promoting sustainable agriculture, including impacts to water resources. In furtherance of this mission, CFS uses legal actions, groundbreaking scientific and policy reports, books and other educational materials, and grassroots campaigns on behalf of its 850,000 farmers and consumer members across the country. F.8-3

The California Native Plant Society ("CNPS") is a non-profit environmental organization with 10,000 members in 35 Chapters across California and Baja California, Mexico. CNPS' F.8-4

mission is to protect California's native plant heritage and preserve it for future generations through application of science, research, education, and conservation. CNPS works closely with decision-makers, scientists, and local planners to advocate for well-informed policies, regulations, and land management practices.

F.8-4 cont.

I. The Current Project Description Does Not Represent The True Scope of the Project and is Misleading.

Under CEQA, a "project" is defined as "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment . . . ." (*Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1222 (citing CEQA Guidelines § 15378, subd. (a).) An "accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." (*Cnty. of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193; (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 655 (project description held unstable and misleading) [hereinafter "*San Joaquin Raptor*"].) "However, a curtailed, enigmatic or unstable project description draws a red herring across the path of public input." (*San Joaquin Raptor*, 149 Cal.App.4th, at 655.).

F.8-5

An inaccurate or truncated project description is prejudicial error because it fails to "adequately apprise all interested parties of the true scope of the project." (*See City of Santee v. Cnty. of San Diego* (1989) 214 Cal.App.3d 1438, 1454-55 [hereinafter "*City of Santee*"].) "Only through an accurate view of the project may the public and interested parties and public agencies balance the proposed project's benefits against its environmental cost, consider appropriate mitigation measures, assess the advantages of terminating the proposal and properly weigh other alternatives." (*San Joaquin Raptor*, 149 Cal.App.4th, at 655.)

F.8-6

The DEIR contains a number of misleading statements regarding the project description. For instance, the DEIR states "the Project anticipates and would complement the planned SR-138 improvements, as intended by the West EOA." (DEIR at 4-9.) The DEIR does not cite any portion of the West EOA that evidences an "intent" for the development of Centennial. Instead, the Antelope Valley Area Plan ("AVAP") merely defines the West EOA as specific lands including "large contiguous landholdings that have been proposed for master-planned developments . . ."[1] (AVAP at IMP-4.) The AVAP cautions that "any master-planned community within the West EOA will require further planning activities in addition to this Area Plan." (*Ibid.*) The AVAP further states that it requires the preparation of a specific plan even for extremely small developments of only five residential dwelling units. (*Ibid.*) Nowhere does the AVAP state that it expects or "intends" the development of a city of nearly 60,000 people in this remote area.

F.8-7

The DEIR's Project Description also misleadingly claims that "No new environmental impacts occur" as a result of permitting assessor dwelling units ("ADUs") on the project due to "variations in household occupancy." (DEIR at 4-18-19.) Obviously, a household that contains an ADU will on average have a significantly higher occupancy than a household that does not

F.8-8

[1] Los Angeles County Department of Regional Planning, Antelope Valley Area Plan (June 2015), available at http://planning.lacounty.gov/assets/upl/project/tnc_draft-20150601.pdf.

F.8-7A

contain an ADU. And with a higher occupancy comes greater environmental impacts – e.g., air pollution and GHG emissions arising from the additional occupants commuting to jobs. F.8-8 cont.

The DEIR needs to clarify whether the additional persons living in ADUs were calculated in assessing the Project's impacts. While it is unclear, it appears that the DEIR excluded persons living in ADUs from its analysis by claiming that "[t]here is also no basis for estimating whether or when an ADU would be built by any given homeowner, and CEQA does not require speculation." (DEIR at 4-19.) This claim is inconsistent with the rest of the DEIR – the DEIR includes estimates regarding the number of residents who would work onsite even though predicting such fact and location-specific phenomena is uncertain. Yet, at the same time, the DEIR avoids "speculation" regarding how many people or developers would build ADUs, even though the DEIR could easily determine ADU rates in neighboring communities. F.8-9

The Project Description does not adequately disclose whether grazing will be allowed on areas designated as "open space." The DEIR states that there will be "continued grazing in some areas." (DEIR at 4-24.) However, the actual Natural Resource/Open Space Management Plan ("OSMP") appears to permit grazing throughout the open space designation. (Appx. 4.0-A at 3-97.) The DEIR should be clear that the OSMP allows grazing throughout areas designated as "open space" if that is what the DEIR permits. The DEIR also vaguely states that grazing might be allowed "in perpetuity if determined necessary to maintain grassland values based Grassland Mitigation Plan." (DEIR at 4-44.) The DEIR needs to be clear who determines whether grazing is "necessary." F.8-10

The DEIR does not contain a firm timeframe as to when construction on the various phases will take place. Instead, the DEIR states that the various project phases would be timed depending upon (1) the state of the economy; (2) market demand for uses on the site; and (3) the timing of regional and off-site infrastructure conditions and needs. (DEIR at 4-91.) This indicates that the developer(s) and/or builders will be able to pick and choose which portions of the development are most profitable at any given time, and only develop those portions. For instance, if only residential – and not commercial development – is profitable, then the developer(s) and/or builders could avoid such commercial development. F.8-11

This lack of clarity renders the Project description unstable, such that the FEIR fails to inform decision-makers and the public of the true scope of the Project from which all interested parties could assess the direct and indirect environmental effects of the Project. (*City of Santee*, 214 Cal.App.3d, at 1454-55; *San Joaquin Raptor*, 149 Cal.App.4th, at 655; *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 83-86.) F.8-12

More importantly, the lack of any firm phasing plan for the Project renders the Project's various calculations and commitments regarding traffic, air pollution, and GHGs unreliable. Even if the DEIR's extremely optimistic internal trip capture rates are correct, they will not be met if the developer(s) build the residential project pieces first and then either abandon or only later build the commercial portions. And even if the commercial portions were eventually built, the Project would still result in a "carbon debt" for the years in which the commercial portions were not built. F.8-13

The DEIR contains a similarly unstable description for school sites. In particular, the DEIR states that "any rejected school site shall revert to residential land use at the density of the F.8-14

surrounding residential designation; however, the maximum number of units allowed by the *Centennial Specific Plan* would not be exceeded." (DEIR at 4-26.) Neither the DEIR's Project Description (nor the text of the Specific Plan) explain the process for "rejecting" a school site. The developer may have an incentive to have school sites "rejected" so it can build more homes. Again, this means that the air quality, traffic, and quality of life benefits of having schools close to residences will not necessarily be realized. Instead, the Project could result in more traffic, air pollution, and GHGs as residents are forced to drive many miles to send their children to schools in other areas. Additionally, the public and local government would need to add expense limited resources in adding schools for residents of the Project.

F.8-14 cont.

The Project Description also provides that the Project "must" meet certain mobility performance standards, including minimum percentages of different types of non-single occupancy vehicle ("SOV") trips. (DEIR at 4-29 – 4-31.) The Project Description fails to describe how such minimum standards will be met. On a practical level, it is unclear what types of mechanisms the project proponent could use to mandate this minimum percentage. Will the project proponent or HOA require residents to report how often they take SOV trips and prohibit them from taking more than a certain amount? Such a system would be unprecedented and likely unworkable. In short, the Project Description should not include promises regarding the attributes of the Project or behavior of the residents that are not enforceable or feasible.

F.8-15

The Project Description further states that the Project will include a "transmit management authority" or "TMA." While the DEIR's Project Description does specify *when* the TMA will be formed, it does not specify how much funding it will receive or identify its funding source. (*See* DEIR at 4-36.) The DEIR also does not specify which entity will fund the "transit centers" near the "village cores." (DEIR at 4-37.) These omissions are especially problematic because the Project Description elsewhere states that "funding for the local transit system would come from a combination of Proposition A and property taxes." (DEIR at 4-37.) The Project Description needs to be clearer whether it will contain a self-funded public transportation system or whether the broader region will bear the cost of this system.

F.8-16

The DEIR states that Caltrans has not yet identified a "preferred alternative" for the Northwest State Route 138 Improvement Project (the "138 Improvement Project"). However, the 138 Improvement Project EIR has since been certified.[2] As such, the DEIR should be updated to reflect this.

F.8-17

The DEIR also is unclear as to whether areas designated as "open space" will remain undeveloped. Notably, while 5,624 acres are designated as "open space," only 3,681 acres are designated as "SEA 17 to be preserved in perpetuity within the Project site boundaries." (DEIR at 4-44.) This suggests that the remaining 1,943 acres will ***not*** be preserved in perpetuity. The DEIR is unclear as to whether the project proponent and/or County can revert any of the "open space" to developable space. Elsewhere in the DEIR, the DEIR states that the Project would "permanently preserve 5,624 acres of on-site open space…" (DEIR at 5.8-59.) If this statement regarding permanent preservation is accurate, the DEIR should include conditions of approval requiring conservation easements for all 5,624 acres.

F.8-18

[2] Northwest State Route 138 Corridor Improvement Project Final Environmental Impact Report/Environmental Impact Statement and Section 4(f) Evaluation (June 2017), available at http://www.dot.ca.gov/d7/env-docs/docs/NW_138-FED-06_28_17.pdf.

F.8-17A

II. The DEIR Fails to Adequately Assess the Project's Traffic Impacts.

The DEIR fails to adequately assess or mitigate the Project's traffic impacts. The report from Griffin Cove Transportation Consulting, PLLC attached as Exhibit A outlines many of deficiencies in the traffic analysis (the "Griffin Letter"). We request that the Final EIR provide specific responses to all of the comments raised in the Griffin Letter. F.8-19

A. Centennial is undisputedly a sprawl project.

One point that needs emphasis is that Centennial is a classic "sprawl" project and contains all of the worst elements of sprawl. As the Girffin Letter explains:

> Stantec Table 3-5 (p. 3.9) shows that the overall average trip length for project-generated traffic will be 25.5 miles, with "external" trips (i.e., those that have an origin or a destination outside the project) having an average trip length of 45.9 miles. Although trip lengths have no effect on the level of service at any of the intersections and roads within the study area, ***these extraordinary values demonstrate clearly that the project exemplifies the worst elements of "sprawl," with its related issues of fuel consumption and pollutant emissions***.

F.8-20

The County should not approve this 20th century sprawl project centered around the automobile. County residents deserve better than to have their air further impaired with disease-causing pollutants and their streets further clogged with cars. And by locking in significant greenhouse gas emissions for the next century, approval of the Project would be a huge step backward in the County and state's efforts to combat the climate crisis.

B. The DEIR does not accurately describe the baseline conditions.

The DEIR misstates the traffic baseline by including other Tejon projects such as Tejon Mountain Village and Grapevine Specific Plan. (*See* DEIR at 5.10-34.) The DEIR improperly suggests these are "approved" projects. While both projects do have certified EIRs, Grapevine is currently subject to litigation brought by CBD and CFS. And both projects have numerous other discretionary agency approvals that they must undergo before breaking ground; for example, both projects will likely require consultation and with U.S. Fish and Wildlife Service for impacts to endangered species and "take" permits. The DEIR's misinformation regarding the traffic baseline undermines its analysis. F.8-21

The DEIR also uses the outdated 2012 SCAG RTP/SCS in its analysis of growth projections. The DEIR should instead reference the 2016-2040 RTP/SCS, which was adopted on April 7, 2016. F.8-22

C. The DEIR understates the traffic impacts of the Project.

The DEIR optimistically claims that "Because of the balanced land use plan, all jobs could be filled by workers in the community and all service needs could be met by on-site retail and other service land uses." (DEIR at 5.10-49.) While this sentence identifies a desirable goal, the DEIR does not cite any evidence showing how all jobs would or could actually be filled by onsite residents. At best, this statement constitutes unfounded speculation; at worst, it is a F.8-23

misleading attempt to downplay the enormous traffic impacts of Project, given that DEIR itself estimates average trip lengths of 45.9 miles. F.8-23 cont.

In addition, as explained in the Project Description section of this letter, the DEIR's various traffic analysis are dependent upon buildout of the Project with both the residential and commercial portions. Yet, the DEIR does not require buildout in any particular order, and even allows the project proponent to avoid building entire portions of the Project if the project proponent so desires based upon "market conditions." Accordingly, the purported "23,675 jobs" generated by the Project may never materialize, thereby requiring *all* the residents to still commute many dozens of miles to their jobs. This lack of stability in the Project renders all of the traffic analyses fundamentally unreliable. F.8-24

The DEIR also contains unreasonable and unsubstantiated assumptions regarding the frequency of non-automobile trips by residents. For example, the DEIR assumes that people will make 3 mile bike trips within 15 to 20 minutes. The DEIR does not cite evidence that people will in fact make such trips on a regular basis. Nor does the DEIR appear to account for the fact that the Project is located in an arid and extremely hot area that contains hilly topography, which may make everyday cycling less desirable to the average resident. While CBD fully supports cycling as a form of transportation for commuting, currently only 0.6 percent of commuters in the U.S. bike to work.[3] The DEIR does not explain how the Project will be substantially different in the amount of cycling done by residents. F.8-25

The DEIR contains other unfounded assumptions regarding the traffic impacts of the Project. For example, the DEIR states that the "Existing plus Project analysis" assumes that "***existing background traffic conditions do not change***, other than changes directly due to the Project, over the approximate 20-year time frame required to build the Project." (DEIR at 5.10-53, emphasis added.) The DEIR again repeats this unfounded assumption later, claiming that "the amount of traffic that would be generated under future conditions in developed areas outside the Project site would not change with or without the Project." (DEIR at 5.10-88.) These statements are inconsistent with the Final EIR for the Northwest State Route 138 Improvement Project – this EIR stated that Highway 138 is "anticipated to experience traffic volumes ***in excess of its existing capacity***." (138 Improvement Project EIR at 4, emphasis added.) Indeed, the stated purpose of the 138 Improvement Project is to accommodate "foreseeable increases in travel and goods movement" in the area of the Centennial. (*Ibid.*) The DEIR for the Project later changes course and states that traffic on SR-138 "is forecasted to exceed available capacity in several locations under cumulative conditions with and without the proposed Project." (DEIR at 5.10-88.) In short, the DEIR cannot both maintain that traffic will increase and will stay the same. F.8-26

The DEIR also uses an outdated measure to analyze whether impacts are significant. In particular, the DEIR claims that if the 138 Improvement Project moves forward, then SR-138 "would operate within acceptable performance criteria . . ." (DEIR at 5.10-90.) The DEIR extensively uses "Level of Service" or "LOS" to analyze the Project's impacts. (*See, e.g.,* Table 5.10-25 & Table 5.10-28, Table 5.10-30.) This fixation on LOS is misplaced given that the State of California recently directed agencies to analyze projects using the Vehicle Miles Travelled F.8-27

[3] Alliance for Biking and Walking, "Bicycling and Walking in the United States 2016 Benchmarking Report," available at http://www.bikewalkalliance.org/download-the-2016-benchmarking-report. F.8-25A

("VMT") measure instead of LOS. In the Updated Guidance Document, the OPR stated, "vehicle miles traveled is the most appropriate measure to replace level of service."[4]

F.8-27 cont.

In addition, while the DEIR approvingly notes Caltran's plans to widen SR-138 are based upon the North County Combined Highway Corridors Study (DEIR at 5.10-35), this 2004 study should have no bearing upon whether the County now approves this growth-inducing and traffic-generating sprawl project. Indeed, the 2004 study did not take into account the impacts of further expanding freeways on air pollution and climate change. In fact, these detrimental impacts to expanding freeways are never mentioned in the report.[5]

F.8-28

D. The DEIR's Traffic Mitigation Measures Are Inadequate.

The County is required to adopt all feasible mitigation measures to lessen the traffic impacts of the Project. Nonetheless, the DEIR does not adequately analyze whether certain mitigation measures are feasible and instead short-circuits the process by assuming that certain impacts are "significant and unavoidable." More specifically, the DEIR states: "If improvements at Project access points on SR-138 are not constructed, impacts would be significant and unavoidable." (DEIR at 5.10-130.) The problem with this statement is that the DEIR does not consider whether such access points *can* be constructed, or whether it is feasible to do so. CEQA requires that if such improvements at project access points are "feasible," then the DEIR must include these measures are a condition of project approval. The DEIR cannot assume that impacts are "unavoidable" merely if such improvements are not constructed. The DEIR attempts to substantiate its claims by noting that the County lacks jurisdiction over state highway facilities. (DEIR at 5.10-130.) While this is generally true, the DEIR does not require the project proponent to fund such highway facilities. The County does have the power to require the project proponent to fund them as a condition of the Project. Again, the County is prohibited from approving the Project until it has required the project proponent to comply with all feasible mitigation measures within its power to lessen the Project's environmental impacts.

F.8-29

Other traffic mitigation measures identified in the DEIR are illusory and unenforceable. For instance, MM 10-2 merely requires the project proponent to submit a traffic study to the County. (DEIR at 5.10-145.) This is not a mitigation measure. Similarly, MM 10-6 states that the project proponent shall comply with the terms of the Centennial Transportation Improvement Plan ("CTIP"). (DEIR at 5.10-145.) Yet, as noted above, the DEIR does not require the project proponent to even enter into a CTIP; it only requires the project proponent to ***seek*** to enter into a CTIP. MM 10-3 also just requires the project proponent to "seek" to enter into a CTIP. (*Ibid.*) As such, MM 10-6 is not binding upon the project proponent. Likewise, MM 10-7, 10-8, and 10-9 contain language allowing the project proponent to either comply with the CTIP or contribute its "fair share" towards infrastructure improvements. (DEIR at 5.10-146.) At most, these measures commit the project proponent to paying some unspecified amount of money to alleviate the Project's impacts, with no assurances that such "fair share" payment will adequately mitigate such impacts.

F.8-30

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[4] https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf

[5] North County Combined Highway Corridors Study, SR-14, SR-138, and I-5, Final Report (June 2004), available at http://media.metro.net/board/Items/2004/07_July/NORTH%20%20COUNTY.pdf.

F.8-27A

F.8-28A

The DEIR elsewhere again states that the project proponent would either enter into an agreement with Caltrans to fund transportation facility mitigation measures or it would pay its "fair share" towards MM implementation. (DEIR at 5.10-1.) The DEIR does not explain what constitutes a "fair share" and does not commit the project proponent to paying for the MMs in the event that Caltrans lacks the funds to do so. MM 11-3 merely requires the project proponent to "seek" to enter into an agreement with the County and Caltrans called the CTIP to fund mitigation measures for the project. (DEIR at 5.10-52.) F.8-31

The DEIR therefore impermissibly puts the burden of significant impact reduction on Caltrans and their improvement of State facilities. F.8-32

Moreover, the DEIR does not analyze the environmental impacts of the traffic mitigation measures. The DEIR specifically calls for widening significant portions of SR-138 to a four-lane highway in order to mitigate impacts of the Project. (*See* DEIR at 5.10-84.) Yet, the DEIR does not consider the environmental impacts of these mitigation measures, which undoubtedly will result in habitat destruction, growth-inducing impacts, and impaired wildlife connectivity. F.8-33

III. The DEIR Fails to Adequately Assess the Project's Noise Impacts.

A. The DEIR fails to adequately assess noise impacts from traffic.

Traffic created and facilitated by the Project will cause direct, indirect, and cumulative environmental impacts, including increased traffic-related noise. The DEIR recognizes that Project-related vehicular traffic will cause significant impacts to sensitive receptors. However, the mitigation that the DEIR proposes does not meet CEQA's enforceability standards and must be revised. The mitigation measures regarding roadway noise impacts do not provide decision-makers or the public with any concrete information, as required by CEQA. (Guidelines § 15126.4(a)(2); *Federation of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261 (mitigation measures must be "fully enforceable through permit conditions, agreements, or other measures" so "that feasible mitigation measures will actually be implemented as a condition of development").) Mitigation must be binding and enforceable to be valid. (Guidelines § 15126.4, subd. (a)(2)). The project proponent cannot defer formulating enforceable mitigation that would reduce impacts until after project approval. (CEQA Guidelines § 15126.4, subd. (a)(1)(B); *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 234 Cal. App. 4th 214, 240.) "[A]n agency goes too far when it simply requires a project applicant to obtain a [] report and then comply with any recommendations that may be made in the report." (*Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 793.) F.8-34

As mentioned, traffic will be one the main Project-generated noise. Despite this, the DEIR fails to provide a satisfactory description of mitigation measures for reducing traffic created noise to less than significant. The DEIR states that methods for reducing traffic related noise are out of the control of the project proponent and require alterations to private property. (DEIR 5.12-1.) MM 12.1 proposes combatting significant noise impacts from traffic by requiring the project proponent to submit a noise assessment (DEIR 5.12-48), which may or may not be used to formulate mitigation and which may or may not be effective. Furthermore, the DEIR does not provide standards outlining how the decision-maker would be able to determine whether any future mitigation measures would be deemed effective, and any mitigation would be F.8-35

proposed only after project approval. CEQA requires more. The DEIR then suggests the project proponent/other parties may be required implement noise reduction measures but provides no guidelines to show whether any future mitigation would be effective. (DEIR 5.12-1.) The burden of mitigation measures rests on the project proponent, not on private parties to install their own noise cancelling features. Additionally the mitigation measures provided fail to include any tangible actions to be taken outside of conducting an acoustical analysis and including appropriate noise-reduction features. (DEIR 5.12-1.) The mitigation measures provided fail to meet basic CEQA requirements. F.8-35 cont.

The DEIR provides conflicting statements about mobile source noise levels: the DEIR states that project-generated traffic would potentially create noise levels in excess of the State and County Standards but then later states that mobile equipment noise levels would not exceed County standards and would be less than significant. (DEIR 1-20.) This ignores the fact that mobile equipment cannot be distinguished from "traffic" noise as both come from mobile sources. F.8-36

The DEIR also states without support that, although Project-generated traffic noise would be significant, noise increases of 3.3 dBA and 3 dBA are barely perceptible to most people. (DEIR 5.12-1.) This is both unsupported by substantial evidence and discounts the noise perceptibility of wildlife. F.8-37

B. The DEIR fails to adequately assess General Plan consistency and noise.

The DEIR states that maximum noise levels are prescribed by the County Code ("Noise Ordinance"). (DEIR 5.12-1). The DEIR attempts to underscore the noise related impacts of the project by stating that "the land uses proposed as part of the Project are routinely constructed in Southern California and are able to meet the applicable noise standards through use of common, feasible methods and materials[.]" (DEIR 5.12-1.) However, other land uses and their impacts are irrelevant to the current Project. Additionally, the DEIR states that the construction period for the Project is approximately 20 years but goes on to state, without any additional information, that despite this two-decade construction project, noise level due to construction would be relatively short-term and temporary. (DEIR 5.12-2.) F.8-38

MM 12-3 vaguely states that noise generated from stationary construction equipment would be mitigated by requiring stationary equipment to operate at greater than 450 feet (DEIR 5.12-2) but fails to give adequate information as to what this means: 450 feet from other equipment? 450 feet from sensitive receptors? It is unclear. The DEIR also states that equipment staging and maintenance areas should be located 500 feet from sensitive receptors, but only if feasible (DEIR 5.12-49), which creates no binding requirement on the project proponent. MM 12-3 would limit the hourly daytime noise level to 60 dBA or less, which the DEIR states would be less than significant. (DEIR 5.12-2.) However, Table 5.12-2 indicates that the County Code limits noise levels for noise-sensitive areas and residential properties at all times of the day to 50 dBA or less. (DEIR 5.12-6.) It is also unclear how Table 5.12-2 can be reconciled with Table 5.12-3 (DEIR 5.12-8) as deserving separate analyses because many of the construction noises will come from stationary sources. F.8-39

C. The DEIR fails to adequately assess cumulative impacts and noise.

CEQA defines "cumulative impacts" as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." (Guidelines § 15355.) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project "when added to other closely related past, present, and reasonably foreseeable probable future projects." (CEQA Guidelines § 15355(b).) And while an agency is not expected to foresee the unforeseeable, it is expected to use its "best efforts to find out and disclose all that it reasonably can." (CEQA Guidelines § 15144; see also *City of Richmond*, supra, 184 Cal.App.4th at 96; *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 428 [hereinafter *Vineyard*].) F.8-40

The purpose of analyzing cumulative environmental impacts is to assess adverse environmental change "as a whole greater than the sum of its parts." (*Environmental Protection Information Center v. Johnson* (1985) 170 Cal.App.3d 604, 625.) Absent meaningful cumulative analysis there would be no control of development and "piecemeal development would inevitably cause havoc in virtually every aspect of the [] environment." (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 721.) F.8-41

The DEIR impermissibly relies on the aforementioned mitigation measures to conclude that there would be no cumulative noise impacts related to construction, stationary sources, and mobile source noise from traffic. (DEIR at 7-21.) The DEIR states that the potential for overlapping construction activity from this Project and SR-138 activities is low because of "the mobile nature of construction activities (moving from area to area on a site or alignment)." (*Id.*) This statement runs contrary to common sense; construction typically occurs within a confined area for the duration of that particular project. F.8-42

IV. The DEIR Fails to Adequately Disclose, Analyze, or Mitigate the Project's Impacts to Population, Housing, and Employment.

The DEIR states that the Project would provide an estimated jobs/housing ration of 1.22 through development of commercial and business park uses on site. (DEIR at 1-17.) The DEIR also claims that development of job opportunities at the site reduces vehicle trips and their associated emissions. (DEIR at 5.9-23.) However, there is no guarantee that those living in the area will work on site or that those working on site will live in the area. Moreover, there is no guarantee that the jobs being offered will provide adequate income to support the housing that the Project will be building. The DEIR relies on the assumption that local employment opportunities will meet most of Project residents' employment needs. (DEIR at 5.9-3.) However, this conclusion overlooks the current state of Kern County's job market. As the DEIR recognizes, Kern County is experiencing remarkably high rates of unemployment, and there is no evidence that this is a temporary phenomenon. (DEIR 5.9-22.) According to the DEIR, Kern County has an unemployment rate of 9.2 percent as of 2016—almost two times higher than the California average. (*Id.*) Employers in Kern County have been shedding rather than creating jobs, and these unemployed Kern County residents will likely welcome any new jobs the Project creates. It is therefore likely that workers residing offsite will flood the Project's job market. F.8-43

The DEIR states that the Project would substantially increase population and housing relative to the existing Project site conditions, which by the DEIR's own admission, is F.8-44

considered significant. (DEIR at 5.9-31). However, the DEIR attempts to negate this significance by stating that the Project would be growth accommodating and not growth inducing, citing consistency with regional growth plans. (DEIR at 5.9-31.) The DEIR cannot override their own finding of a significant impact by citing consistency with growth plans in the region, a separate and unrelated threshold standard. The increase in population and housing on the Project site is significant and unavoidable (DEIR at 5.9-33) and CEQA requires a discussion of mitigation measures relative to this significant impact.

F.8-44 cont.

There is also a much higher chance than the DEIR suggests that Project residents will work in the higher-paying, larger Los Angeles job market. It is quite possible that the main demographic that could afford Project housing will be current Los Angeles residents looking for housing outside of Los Angeles. The DEIR states that SCAG projects that Los Angeles County will experience substantial growth between 2012 and 2040 (DEIR 5.9-2); SCAG actually indicates that the average annual growth rate of population has been decreasing, and a rate faster than both California and the United States (SCAG Table 2.) "The SCAG region's population is projected to grow slower than that of the previous years." (SCAG at 12.) Moreover, SCAG indicates that the age of residents in regional households are increasing while the working age population of 16-64 years old have shown decline which "may result in a potential shortage of works and slower job growth unless the older population extends their retirement age." (SCAG Table 4, SCAG at 14.) This means few residents are of peak employment age living in the city, meaning the regional ability to fill employment (likely retail) of the Project are limited.

F.8-45

The DEIR fails to address cumulative impacts regarding population, housing, and employment and instead counteracts earlier disclosures regarding significant, stating that the impacts would be less than significant and do not require mitigation because of their relationship to County and regional plans. (DEIR 7-19.) Yet the DEIR then immediately follows this by stating that the existence of the Project creates a significant adverse indirect growth-inducing impact. (*Id.*)

F.8-46

V. The DEIR Fails to Adequately Analyze the Project's Growth-Inducing Impacts.

EIRs are required to provide a detailed discussion regarding the growth-inducing impacts of a project. (Guidelines §§ 21100(b)(5); 21156.) In addition, *Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 369 sets forth three factors to determine the level of detail required in a growth-inducing impacts analysis: (a) the nature of the project; (b) the directness or indirectness of the contemplated impact; and (c) the ability to forecast the actual effects the project will have on the physical environment. (*Id.*) Applied here, these factors militate in favor of a highly detailed analysis – (a) the Project is extremely large and will result in the installation of a city in a remote and undeveloped area; (b) the Project will result in direct impacts on thousands of acres of undeveloped land as well as indirect impacts such as further infrastructure growth; (c) forecasting the effects on the physical environment is generally feasible.

F.8-47

Despite *Napa Citizens*, the DEIR's growth-inducing impacts section is only nine pages in length, and the "analysis" portion is less than four pages. More importantly, the analysis is riddled with inconsistencies and faulty assumptions, as discussed below:

F.8-48

The DEIR for the current Project references an EIR that was conducted for AVAP in 2015 as though the AVAP EIR is relevant and supersedes an analysis for the current Project. (DEIR at 6-2.) Whatever previous environmental review has occurred is irrelevant for the current Project. Additionally, alleged consistency with planned growth in the region (*Id.*) does not negate a need for consideration of growth-inducing impacts for the Project. Yet, despite these statements indicating consistency with anticipated growth, the DEIR by its own admission states that the Project would substantially increase population and housing relative to existing site conditions and that it is reasonably foreseeable that future *unplanned* development may occur. (*Id.*) F.8-49

The DEIR suggests that the Ranchwide Agreement entered into in 2008 will limit growth. (DEIR at 6-4.) As a preliminary matter, given that the Ranchwide Agreement is extensively referenced in the DEIR, a copy of the Agreement must be included as an exhibit or appendix to the DEIR. The existence of this agreement does not negate a need to consider growth-inducing impacts for the current Project, especially considering at least one the projects covered under the Agreement is currently under litigation. CEQA requires that the DEIR analyze impacts that are indirect and impacts to on adjacent properties – not just the developer's own property. F.8-50

In addition, the Ranchwide Agreement is not a binding and enforceable mitigation measure under CEQA, such that the DEIR cannot rely upon it to mitigate growth-inducing impacts, impacts to biological resources, or any other impacts. Indeed, per section 3.9 of the Ranchwide Agreement, the only party that can enforce the Agreement is the Tejon Ranch Conservancy, which is partially controlled by the project proponent. F.8-51

The DEIR claims that the Project's infrastructure facilities are not sized to accommodate growth beyond that which is proposed for the Centennial Project. (DEIR at 6-7.) This statement oversimplifies growth-inducing impacts; a project would not build more infrastructure than the project requires, but the mere existence of those facilities makes increasing and connecting to those facilities much easier than if they did not exist in the first place. The DEIR does admit that future nearby landowners could propose to connect to or build upon the Project's infrastructure to serve future development in the surrounding area. (DEIR at 5.8-22.) F.8-52

The DEIR contains inconsistencies relating to significant impacts between and among sections of DEIR. Additionally, the DEIR does not adequately analyze impacts and develop mitigation measures for those impacts. For a finding of significant impact, CEQA requires that mitigation measures be identified to reduce the impact to less than significant. (Guidelines Appendix G p.327.) For example, in the Population section, the DEIR states that there will be significant and unavoidable increases in population and housing (DEIR at 5.9-3) but fails to address any mitigation measures. "The project would not result in significant growth-inducing impacts" (DEIR 6-9) immediately followed by "existence of project…could result in a significant impact on the environment…which is considered and an adverse indirect growth-inducing impact." (*Id.*) Not only is this a clear inconsistency, which frustrates CEQA's informational and public-participation goals, but this finding of significance nor mitigation measures are discussed in the Population section to which the DEIR is referring. [*See Laurel Heights Improvement Assn v. Regents of or the University of California* (1988) 47 Cal.3d 376, 390, 392 ("CEQA's fundamental goal that the public be fully informed as to the environmental consequences of action by their public officials.").] The DEIR states that there will be no F.8-53

changes by the Project that would affect population generation or otherwise lead to additional indirect growth (DEIR at 6-1) then later admits that there will be growth inducing impacts to the eastern fringes of project site. (DEIR at 6-2.) DEIR also states that the Project would not lead to substantial growth on the Project site. (DEIR at 5.9-27.)

F.8-53 cont.

Inconsistencies also exist between the growth-inducing impacts and other sections of the DIER. For example, as previously pointed out, the DIER states that there will be significant and unavoidable growth inducing impacts regarding population but none regarding traffic. This is a clear inconsistency and fails to consider that increases in population will necessarily implicate growth-inducing impacts regarding traffic. (DEIR at 9.4.)

F.8-54

The DEIR repeatedly attempts to understate the projects impacts by relying on the non-CEQA term "growth-accommodating." (DEIR at 5.9-33.) CEQA requires an analysis of growth-inducing impacts; the term "growth accommodating" has no basis in CEQA and the assertion that the Project is growth accommodating is not supported by substantial evidence.

F.8-55

The DEIR does not acknowledge its role in causing growth-inducing impacts, particularly regarding the Northwest State Route 138 Improvement Project (the "138 Improvement Project"), for which the final EIR was certified in June 2017.[6] The 138 Improvement Project will turn the existing 2-lane highway into a 6-lane freeway, thereby impairing wildlife connectivity and paving over habitat. The 138 Improvement Project EIR routinely references Centennial as one of the key projects expected to cause growth in the area, thereby necessitating the 138 Improvement Project. (*See* 138 Improvement Project EIR at 31, 47, 83, 336.) The 138 Improvement Project EIR further states that the purpose of the project is to "[a]ccommodate foreseeable increases in travel and goods movement within northern Los Angeles County." (*Id.* at 3.) In short, the specter of Centennial appears to be of the key reasons that the 138 Improvement Project was approved. The DEIR admits as much, stating that "the Project anticipates and would complement the planned SR-138 improvements." (DEIR 4-9.) Accordingly, the DEIR must analyze, disclose, and mitigate growth-inducing impacts arising from the 138 Improvement Project.

F.8-56

VI. The DEIR Fails to Adequately Analyze the Project' Impacts on Visual Resources.

The Aesthetics section of the DEIR contains numerous deficiencies and inaccuracies. The DEIR concludes that there will be a less than significant impact to the Pacific Crest Trail ("PCT") because MM 13-4 will construct a wall that would screen structures and residences (DEIR at 5.13-21.) Basic common sense indicates that it would be almost worse to put up a large wall in a scenic trail – it is difficult to conceive how this measure would mitigate the impact to hikers on the trail when compared the current environmental setting. Furthermore, the DEIR only claims that the U.S. Forest Service, Pacific Crest Trail Association, Tejon Conservancy, and Tejon Ranch Company are in ongoing discussions regarding an alternative realignment for the PCT, without giving any more on whether this is binding or how these discussions contribute to mitigating significant impacts. (DEIR at 5.13-11.)

F.8-57

[6] Northwest State Route 138 Corridor Improvement Project, Final Environmental Impact Report / Environmental Impact Statement and Section 4(f) Evaluation.

F.8-56A

The DEIR provides an unclear analysis regarding scenic highways. The DEIR seem to be indicating that, although many of the roads are considered scenic drives on the AVAP, inclusion of the site in the West EOA counteracts these considerations. (DEIR at 5.13-2.) This is incorrect – the DEIR must analyze all direct and indirect impacts of the Project and cannot generally cite to other plans in justifying the Project. Regardless, the DEIR is wrong in claiming that the Project would not substantially damage scenic resources within a state scenic highway. (DEIR at 5.13-24.) The DEIR States:

> The greatest change in scenic views would occur on SR-138 as development occurs on both sides of this road, as it passes through the site. Existing views of undeveloped land and agricultural land would be replaced with business parks and commercial structures, as well as residential development that would be constructed onsite. While distant views of the mountains will remain, the view of passing motorists will consist of urban structures that would be different than the existing rural environment. (*Id.*)

F.8-58

The DEIR states that there will be significant and unavoidable impacts regarding new sources of light and glare (5.13-2), counteracted by MM 13.6, referred to as a Dark Sky Plan (DEIR at 5.13-2.) The DEIR does not set forth adequate measures to mitigate the substantial light pollution caused by the Project. While the DEIR proposes a number of mitigation measures such as directing light downward and using time control devices (DEIR at 5.13-31), there is no way to mitigation the light impacts of installing thousands of people in an undeveloped wildlife area. The DEIR fails to cite any studies or biological opinions indicating that the mitigation measures proposed are sufficient to mitigate impacts on wildlife.

F.8-59

The DEIR states that construction will last 20 years and result in a significant and unavoidable impact to visual character, yet provides no mitigation measures to combat this. (DEIR at 5.13-14.)

F.8-60

The DEIR also states that converting the site from a rural to an urban condition, which would partially to wholly obstruct existing views, would result in a significant and unavoidable impact to the visual character of the Project site and surrounding area. (DEIR at 5.13-19.) The only mitigation measure discussed, though, are inadequate. MM 7-13 (DEIR at 1-58), discusses a landscaping plan including use of non-invasive species; MM 13-1 (DEIR at 5.13-19) discusses preservation of existing rock outcroppings, but only to the extent feasible,[7] and implementing designs that emulate natural contours of existing topography (although none of the visuals provided, especially Exhibit 5.1-4 with its use of extensive glass windows, seem to emulate this); MM 13-2 (DEIR at 5.13-19) discusses clustering development to minimize impacts to dense stands of oak trees, steep slopes, and existing natural drainages; and MM 13-3 (DEIR at 5.13-9) indicates that off-site electrical lines *may* be placed underground. None of these mitigation measures are sufficient and do not impose real requirements on the Project.

F.8-61

[7] What is "feasible" is not defined, therefore, this mitigation measure is also illusory and lacks enforceable performance standards because the project proponent may decide on its own that compliance is not "feasible."

F.8-61A

VII. The DEIR Fails to Adequately Analyze the Project's Impacts to Fire Services.

The DEIR concludes that MM's 16-1 through 16-3 would reduce the impact to fire services to less than significant. However, these mitigation measures do not take into consideration the environmental analysis or impacts of building new facilities; instead, the DEIR defers analysis stating that actual square footage of each fire station would be determined at the time of Project development. (DEIR 5.16-12.) The DEIR also fails to conduct an analysis of environmental impacts from the construction of water systems/access to existing bodies of water or the construction of internal roadways to accommodate emergency ingress and egress. (DEIR 5.16-13, 5.16-14.) F.8-62

The DEIR states that the Project would introduce urban development into an undeveloped area that is subject to wildfire hazards. (DEIR at 5.16-14.) The DEIR also states that portions of the Project are within a very high fire hazard safety zone but never discloses where this area is in relation to the Project. (*Id.*) This fails to inform the public as to the fire dangers associated with the Project. Additionally, building houses in "high" and "very high" Fire Zones will require compliance a "Fuel Modification Plan." (DEIR at 5.16-14.) Nonetheless, the DEIR does not provide any information regarding the specifics of this fuel modification plan, nor does the DEIR analyze the environmental impacts on biological resources of implementing such a plan. F.8-63

The DEIR should include areas impacted by fuel modification plans as part of the development "footprint" of the Project, and be analyzed as such. Moreover, no fire clearance/thinning activities should occur within the boundaries of any federally designated critical habitat, open-space, natural area or wildlife movement corridor. Finally, fuel modification plans must ensure that no invasive species are planted as part of the plans. F.8-64

VIII. The Alternatives Analysis in the DEIR Is Inadequate and Fails to Comply with CEQA.

CEQA mandates that significant environmental damage be avoided or substantially lessened where feasible. (Pub. Res. Code § 21002; Guidelines §§ 15002(a)(3), 15021(a)(2), 15126(d).) Moreover, although "an EIR need not consider every conceivable alternative to a project . . . it must consider a reasonable range of potentially feasible alternatives that will foster informed decision decision-making and public participation." (Guidelines § 15126.6(a).) Additionally, the "key to the selection of the range of alternatives is to identify alternatives that meet most of the project's objectives but have a reduced level of environmental impacts." (*Watsonville Pilots Assn. v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1089.) Accordingly, a rigorous analysis of reasonable alternatives to the Project must be provided to comply with this strict mandate. Unfortunately, the DEIR fails to meet this requirement on two levels: the DEIR analysis of the alternatives proposed is inadequate and the DEIR fails to include a reasonable range of alternatives. F.8-65

A. The DEIR does not adequately analyze and compare the proposed alternatives.

The first project objective – which is to "Implement the Antelope Valley Area Plan…" – impermissibly restricts the alternatives analysis because it too narrowly frames the goal of the F.8-66

project as somehow flowing from a need to respond to the existence of this area plan. (DEIR 8-69.)

F.8-66 cont.

In analyzing the No Project Alternative, the DEIR impermissibly rejected this alternative in a conclusory fashion. (*See Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935 ("To facilitate CEQA's informational role, the EIR must contain facts and analysis, not just the agency's bare conclusions or opinions."). The DEIR states that this alternative is not consistent with the AVAP without giving any more information. (DEIR at 8-30.) It is likely that the DEIR intends to argue that the existence of the AVAP somehow *mandates* development; yet, this is not correct. Additionally, if the reasons for rejection the No Project Alternative is for feasibility reasons, case law indicates the standard for feasibility is high and the project proponent has not demonstrated lack of feasibility for other locations.

F.8-67

The DEIR provides insufficient and confusing reasons given for eliminating the Public Input Alternative from further consideration. The impetus for this alternative seems to be to design a wildlife reserve and proposes to set aside the majority of the Tejon Ranch property as open space. (DEIR at 8-13.) Yet, the DEIR rejects this alternative, claiming that this alternative does not provide enough acreage to include on-site natural open space areas and leaves a substantial amount land undeveloped. (*Id.*)

F.8-68

In analyzing Alternative B – Previously Proposed Project, The DEIR impermissibly tries to break up the "footprint" by land use type (i.e. residential, commercial, etc.) in order to argue that the proposed project has decreased its footprint/site acreage from the previously proposed project site. Although the proposed Project may have a smaller designation for *commercial* uses, the overall footprint of the project is larger. The DEIR itself admits this when it states that the proposed Project expands site boundary by approximately 647 acres (DEIR at 8-9.) Table 8-1 additionally indicates that the proposed project site will consist of 12,323 acres while the previously proposed project site consisted of 11,676 acres. The current project increases the project site by 647 acres. (DEIR at 8-15.) The DEIR also confusingly states that Alternative B is a larger alternative than the proposed Project (DEIR at 8-16.)

F.8-69

In analyzing Alternative C – Additional Drainage Avoidance, the DEIR fails to explain why this alternative is not considered the preferred alternative given that is has fewer environmental impacts than the proposed Project, meets the project goals, and creates no more significant and unavoidable impacts than the proposed Project. (DEIR at 8-44). And in analyzing Alternative E – Density Clustering/East of Aqueduct, the DEIR similarly fails to explain why this alternative is not considered the preferred alternative given that is has fewer environmental impacts than the proposed Project, meets the project goals, and creates no more significant and unavoidable impacts than the proposed Project. (DEIR at 8-59 – 8-60.) The DEIR lists Alternative E as the environmentally superior option but provides no explanation for why the project proponent chose not to make this their preferred alternative. Under CEQA, "the public agency bears the burden of affirmatively demonstrating that, notwithstanding a project's impact on the environment, the agency's approval of the proposed project followed meaningful consideration of alternatives and mitigation measures." (*Mountain Lion Foundation v. Fish & Game Com.* (1997), 16 Cal.4th 105, 134.)

F.8-70

In analyzing Alternative D – Infrastructure Relocation, it is unclear why Alternative D was even considered or what value it adds at all to the project/public reviewing the DEIR. (DEIR at 8-51.)

F.8-71

B. The DEIR should have considered accommodating development in disturbed areas.

In analyzing all of the alternatives, the DEIR should have discussed the need for the Project and whether the uses that would potentially utilize the Project can be accommodated in existing areas. As CAPCOA states in its white paper, one way local governments can avoid significant increases in GHG emissions and help solve the problem of climate change is to "facilitate more efficient and economic use of the lands" already developed within the community. (CAPCOA 2008.) Reinvesting in existing communities is "appreciably" more efficient than new development and may even result in a net reduction of greenhouse gases. (CAPCOA 2008.) The DEIR should consider an alternative that relies more on higher-density mixed commercial/residential development projects on existing disturbed lands in order to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and encourage efficient delivery of services and goods. (Office of the California Attorney General 2008.). Here, the objectives do not indicate that this specific site is necessary to accomplish the project goals (other than the first objective, which as previously stated, is impermissibly narrow).

F.8-72

C. The DEIR should have considered a wider range of alternatives, including those with a significantly smaller development footprint.

The DEIR should have analyzed a wider range of alternatives. As courts have made clear, "[a] potential alternative should not be excluded from consideration merely because it would impede to some degree the attainment of the project objectives, or would be more costly." (*Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal. App. 4th 1437, 1456-57 (quotations omitted).) The DEIR should have included a larger range of alternatives from which decision-makers could choose.

F.8-73

The DEIR improperly refused to consider any alternatives for projects with a significantly smaller development footprint. The DEIR states:

> Because the proposed Project was substantially reduced compared to the previously proposed project (Alternative B) in both development footprint and land use intensity to avoid and/or reduce environmental impacts, further consideration of a reduced development scenario (e.g., reduced grading footprint; reduced dwelling units; reduced nonresidential square footage) was not considered reasonable. (DEIR 8-10.)

The implication here is that is if the project footprint is somewhat reduced from an (1) extremely large project to (2) a very large project, then any project smaller than a very large project is "unreasonable," such that the County is excused from considering any smaller project alternatives. Neither the CEQA Guidelines nor case law support this proposition, nor does the EIR cite any authority supporting this striking assertion.

F.8-74

The DEIR again trots out the unfounded claim that the Project is "required" to be very large in order to support "the goals and policies of the AVAP." (DEIR 8-10.) Contrary to the DEIR's misleading assertions, the AVAP does not mandate that a very large version of Centennial go forward; it envisions that some level of development ***may*** occur in the area, provided that such development is approved by applicable authorities and complies with applicable laws, including CEQA and the state and federal Endangered Species Acts. Indeed, the sentences following this claim undermine it – the DEIR states that the Project would require significant amendments to applicable land use plans (e.g., amendment to the AVAP Highway Plan and adoption of a Specific Plan). (*Id.*) If the Project is "required" by the AVAP, then why does the project necessitate amendments to land use plans? F.8-75

The DEIR also claims that "any reduction" in the proposed project size would not be "supportive of the project objectives." (*Id.*) The DEIR does not provide any evidence indicating that a smaller version of the project is not feasible. Such conclusory claims are insufficient under CEQA. (*See Concerned Citizens*, 42 Cal.3d at 935 ("To facilitate CEQA's informational role, the EIR must contain facts and analysis, not just the agency's bare conclusions or opinions."). Such conclusory claims are especially inappropriate here when the County is considering whether to approve the installment of a city in a remote and undeveloped area. F.8-76

By refusing to include any alternatives that provide for a significantly reduced project size, the DEIR sets up a false "all or nothing" decision for the County and prohibits the County from considering or approving a smaller version of the Project that does not have such profound environmental impacts on California's grasslands, air quality, and carbon footprint. The DEIR's failure to include any alternatives with a significantly reduced footprint also violates CEQA's mandate that a reasonable ***range*** of alternatives be considered. F.8-77

The project could be significantly down-sized and still be considered "feasible." Whether a project is economically unfeasible "is not measured by increased cost or lost profit, but upon whether the effect of the proposed mitigation is such that the project is rendered impractical." (*Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587, 600 (internal citation omitted).) In *Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 Cal.App.3d 1167, 1180, the Court agreed with the trial court that the administrative record did not contain analysis of the project alternatives in terms of comparative costs, comparative profit or losses, or comparative economic benefit to the project proponent or the community at large. F.8-78

IX. The DEIR Fails To Adequately Analyze, Disclose, And Mitigate The Project's Greenhouse Gas Emissions.

Climate change and the finite nature of fossil fuel energy sources require the increased development of renewable sources of energy, such as solar and wind. (Cameron 2012) However, these developments, especially when done on a large scale, can have negative impacts on local species and their habitats. (Subramanian 2012; Lovich 2011) Renewable energy development projects need to ensure that the solution to environmental harm does not become part of the problem. (Cameron 2012; Walston 2016) Distributed solar, as opposed to utility scale, is one way to avoid energy developments that convert prime habitat into unusable areas for species. F.8-79

(McDonald 2009) When solar becomes part of already existing infrastructure and development, its footprint and impact is reduced. (Elkind 2009)

F.8-79 cont.

A. Electricity generation is a key contributor to greenhouse gas pollution.

The generation and consumption of electricity pose many negative impacts to human and environmental health. Therefore, it is necessary to both reduce consumption through conservation and efficiency, and also transition to less damaging forms of generation. Electricity generation accounts for 20% of California's greenhouse gas emissions. Without energy efficiency measures, California's combined electricity demand is projected to grow by 1.41 percent from 2010-2020, while efficiency measures could reduce that to a projected .91 percent. (CEC 2011) Electricity generated from fossil fuels contributed to air pollution from carbon dioxide and fine particulate matter, and water pollution from direct spills or impacts to groundwater through drilling, mining and injection activities. (Heberger 2015) The generation of electricity is highly water intensive, which is problematic in persistent drought conditions. (Larson 2007) In order to reduce the negative impacts to water supplies, water and energy utilities should work together to design more efficient systems for both resources. (Tarroja 2016) Wildlife and their habitats are impacted by electricity generation and transmission. (Cameron 2012) The land-use footprint of energy production is significant and will continue to grow with population unless conservation and distributed generation siting measures are put in place. (Trainor 2016)

F.8-80

The concept of energy efficiency as a resource has the potential to decrease energy production requirements and associated costs and negative impacts. Energy efficiency reduces the need for resource consumption and is thereby in itself a consumable resource with positive impacts rather than negative. (Hopper 2009) Shifting from non-renewable fossil fuels to renewable energy sources will reduce greenhouse gas emissions, air and water pollution and impacts to wildlife and habitat provided these renewable sources are sited appropriately in the vicinity of the demand they serve. (McDonald 2009; Hernandez 2015) As mentioned above, distributed solar, often referred to as rooftop or on-site solar, is a good example of appropriately sited renewable energy that maximizes system and cost efficiency and protects open space, wildlife and habitat. (Elkind 2009; Powers 2009) Legislation that supports the appropriate siting of renewable energy, such as the California Green Building Standards Code, which requires solar-ready roofs and solar-ready pre-wiring, is needed to ensure that renewable energy is able to realize its full potential. (LA Dept. Public Planning 2013) Building codes that support and encourage passive solar design contribute to even greater energy efficiency. (LA DPP 2013) Another building design concept that offers a variety of benefits from greater energy security to cost efficiency and environmental protection is the zero energy building. Such buildings produce enough renewable energy to meet annual needs, and when combined into communities, the zero energy design means that these areas are no longer reliant upon nonrenewable energy grids that harm human and environmental health, contribute to climate change and are vulnerable to outages and natural disasters. (Peterson 2015) The California Public Utilities Commission has committed to the goal of zero net energy for all new residential construction by 2020 and for all new commercial construction by 2030. (CPUC 2008)

F.8-81

B. The DEIR does not adequately disclose or analyze the Project's GHG impacts.

The DEIR's GHG analysis underestimates the amount of GHGs generated by the Project by relying upon the unrealistic assumptions that most residents will find onsite employment. (*See* DEIR at 5-21-64.) The DEIR's GHG emissions analysis also fails to consider the GHG emissions if the Project is not built in the order proposed, which is likely given the flexibility in the DEIR for the developers to modify the Project based upon market conditions and other factors. (*See* DEIR at 4-91.)

F.8-82

C. The DEIR should take a more aggressive approach to reducing the Project's energy demands and increasing use of renewable energy onsite.

The DEIR should take a far more aggressive approach to reducing GHGs arising from the Project. Mitigation measures to reduce vehicle miles traveled, energy use, waste, water consumption as well as use of solar power could lower the Project's impact on climate change (as well as air pollution and water use). CAPCOA has identified existing and potential mitigation measures that could be applied to projects during the CEQA process to reduce a project's GHG emissions. (CAPCOA 2008). The California Office of the Attorney General also has developed a list of reduction mechanisms to be incorporated through the CEQA process. (CAPCOA 2008 at Table 16.) These resources provide a rich and varied array of mitigation measures to be incorporated into the Project.

F.8-83

In general, the EIR should consider mitigation measures that will ensure the Project will use energy efficiently and conservatively. In doing so, it should analyze incorporating "green building" in the development. Green buildings are those buildings that lower energy consumption, use renewable energy, conserve water, harness natural light and ventilation, use environmentally friendly materials and minimize waste. (Commission for Environmental Cooperation 2008.)

F.8-84

Specific mitigation measures for the GHG emissions generated by the Project's energy consumption include, but are not limited to:

- Requiring that all developers seek and obtain the U.S. Green Building Council's LEED or comparable standards for energy- and resource efficient building during pre-design, design, construction, operations and management;
- Designing buildings for passive heating and cooling, and natural light, including building orientation, proper orientation and placement of windows, overhangs, skylights, etc.;
- Designing buildings for maximum energy efficiency including the maximum possible insulation, use of compact florescent or other low-energy lighting, use of energy efficient appliances, etc.;
- Reducing the use of pavement and impermeable surfaces;
- Requiring water re-use systems;
- Installing light emitting diodes (LEDs) for traffic, street and other outdoor lighting
- Limiting the hours of operation of outdoor lighting;
- Maximizing water conservation measures in buildings and landscaping, using drought tolerant plants in lieu of turf, planting shade trees;
- Ensure that the Project is fully served by full recycling and composting services;

F.8-85

- Ensure that the Project's wastewater and solid waste will be treated in facilities where GHG emissions are minimized and captured;
- Installing the maximum possible photovoltaic array on the building roofs and/or on the project site to generate all of the electricity required by the Project, and utilizing wind energy to the extent necessary and feasible;
- Installing solar water heating systems to generate all of the Project's hot water requirements;
- Installing solar or wind powered electric vehicle and plug-in hybrid vehicle charging stations to reduce emissions from vehicle trips.

F.8-85 cont.

The Project should further utilize the following mitigation measures related to construction:

- Utilize recycled, low-carbon, and otherwise climate-friendly building materials such as salvaged and recycled-content materials for building, hard surfaces, and non-plant landscaping materials;
- Minimize, reuse, and recycle construction-related waste;
- Minimize grading, earth-moving, and other energy-intensive construction practices;
- Landscape to preserve natural vegetation and maintain watershed integrity;
- Utilize alternative fuels in construction equipment and require construction equipment to utilize the best available technology to reduce emissions.

F.8-86

D. The DEIR should require "zero net energy" as a condition of the Project.

Other projects in the County that have recently been approved include a goal of zero net GHG emissions. Such projects intend to achieve that goal through reducing onsite GHG emissions to the greatest extent practicable, but also by offsetting any other emissions through local emissions reductions projects.[8] Here, the DEIR fails to provide substantial evidence that such additional reductions needed to achieve zero net energy are infeasible – for instance, the DEIR could include more robust EV charging requirements, more onsite renewable energy, and a program to offset the remaining GHG emissions locally.

F.8-87

Any offset program must ensure "Additionality." California law establishes specific standards for greenhouse gas offset credits used in the AB 32 cap-and-trade system. Health and Safety Code section 38562(d) requires, in relevant part, that:

> (1) The greenhouse gas emission reductions achieved are real, permanent, quantifiable, verifiable, and enforceable by the state board.
>
> (2) For regulations pursuant to Part 5 (commencing with Section 38570) [i.e., regulations implementing the market-based cap-and-trade system], the reduction is in addition to any greenhouse gas emission reduction otherwise required by law or regulation, and any other greenhouse gas emission reduction that otherwise would occur.

F.8-88

[8] *See* California Department of Fish and Wildlife, *Newhall Ranch Resource and Development Management and Development Plan, Final Additional Environmental Analysis*, Appendix 2.1, available at http://planning.lacounty.gov/assets/upl/case/tr_53108_appendix-2-0-cdfw-final-aea-excerpts.pdf.

F.8-87A

(3) If applicable, the greenhouse gas emission reduction occurs over the same time period and is equivalent in amount to any direct emission reduction required pursuant to this division.

F.8-88 cont.

In particular, the two-part definition of "additional" under subdivision (d)(2) requires not only that credited reductions are not otherwise legally required, but also that credited reductions would not otherwise occur in the absence of the offset project.

F.8-89

This definition of "additional" also applies in the CEQA context, as the regulatory history of the relevant CEQA Guidelines makes clear. The CEQA Guidelines specify that only GHG reductions that are "not otherwise required" may be used to offset project emissions. (CEQA Guidelines, § 15126.4, subd. (c)(3).) However, as the California Resources Agency's Final Statement of Reasons for adopting this Guideline explains, the "not otherwise required" language was intended to make clear that only "additional" emissions reductions—that is, reductions not otherwise required by law or likely to occur anyway—may be used to generate offsets for CEQA mitigation.[9] The Final Statement of Reasons explicitly interprets CEQA's mitigation requirements, including requirements governing use of offsets, as "consistent with the Legislature's directive in AB32 that reductions relied on as part of a market-based compliance mechanism must be 'in addition to any greenhouse gas emission reduction otherwise required by law or regulation, and any other greenhouse gas emission reduction that otherwise would occur.'" (*Ibid.*)

F.8-90

In short, if the County does decide to approve an iteration of this Project, we urge the County to require that it be zero net energy and include sufficient safeguards to ensure that any offsets are in fact "additional," as defined by California law.

F.8-91

E. The DEIR fails to adopt all feasible mitigation measures to reduce the Project's GHG emissions.

Mitigation of a project's environmental impacts is one of the "most important" functions of CEQA. (*Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41.) Therefore, it is the "policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures which will avoid or substantially lessen the significant environmental effects of such projects." (Pub. Res. Code § 21002.)

F.8-92

In the GHG context, the CEQA Guidelines specifically requires lead agencies to "consider feasible means, supported by substantial evidence and subject to monitoring or reporting…" (14 Cal. Code Regs. § 15126.4(c).) These measures can include (1) Measures in an existing plan or mitigation program for the reduction of emissions that are required as part of the lead agency's decision; (2) Reductions in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F; or (3) Off-site measures, including offsets that are not otherwise required, to mitigate a project's emissions.

F.8-93

[9] California Natural Resources Agency, Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97 at 48, 87-90 (December 2009).

F.8-90A

As a preliminary matter, many of the proposed mitigation measures are styled as "Project Design Features" or "PDFs." (*See* DEIR at 5.21-41.) Mitigation measures must be binding and enforceable. (Pub. Res. Code § 21081.6(b); Guidelines § 15126.4(a)(2)). In addition, CEQA prohibits an agency from incorporating proposed mitigation measures into the description of the project in order to conclude that the project's impacts will be less than significant. (*See Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 655-56.) The PDFs should be incorporated into the DEIR as mitigation measures so that they are binding, enforceable, and subject to monitoring under CEQA. F.8-94

While we are heartened the Project includes some mitigation measures to reduce the Project's GHG impacts, there are significant areas in which the measures could be much stronger. Below are a few of the instances in which the mitigation measures/PDFs should be strengthened: F.8-95

- The Project should generate more than the proposed 50 percent of renewable energy onsite. (*See* DEIR at 5.21-88; MM 21-2.) Given the extremely sunny climate of the Project site, this percentage could be higher, especially if the Project is to achieve zero net energy. In addition, the DEIR should specify that most or all of this energy will come from distributed rooftop solar. As currently written, the DEIR does not appear to consider impacts on raptors and wildlife – including the critically endangered California condor – of employing wind energy onsite.

- EV chargers should be more widely available for residents of multifamily units as well as people travelling to the Project area for work, shopping, etc. EV chargers in commercial parking lots should have "Level 3" DC fast charging instead of slower Level 2 charging. As currently written, PDF 21-11 and PDF 21-12 could provide for some technology other than EV-charging for multifamily and business uses. (*See* DEIR at 5.21-43.) Alternatives to EV-charging should be in addition to – and not in lieu of – EV charging stations. In addition, the Project should require more charging stations per 50,000 square feet of commercial area as well as more charging stations for multifamily units.

The DEIR does not explain why stronger mitigation measures – including zero net energy standards – are infeasible. Instead, the DEIR generally states that "the Project's climate change impacts would remain significant and unavoidable." (DEIR at 5.21-94.) This is not sufficient under CEQA. The DEIR must provide evidence supporting this claim. (*See Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587, 600 (whether a project is economically unfeasible "is not measured by increased cost or lost profit, but upon whether the effect of the proposed mitigation is such that the project is rendered impractical.").) F.8-96

F. The DEIR fails to adequately analyze the Energy Conservation Mitigation Measures set forth in Appendix F of the CEQA Guidelines.

The DEIR is required to analyze whether the energy conservation mitigation measures in Appendix F of the CEQA Guidelines could be adopted as part of the Project. (*See California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 209 (an EIR is defective when it fails to include a detailed statement setting forth the mitigation measures proposed to reduce wasteful, inefficient, and unnecessary consumption of energy in accordance F.8-97

with Appendix F of the CEQA Guidelines) [hereinafter "CCEC"].) Nonetheless, the DEIR does not appear to contain any analysis of Appendix F. F.8-97 cont.

X. The DEIR's Water Quality Analysis Is Inadequate.

A. The DEIR's analysis of baseline water quality conditions is inadequate.

The DEIR contains inconsistent information regarding the baseline hydrology conditions for the Project. In the Hydrology section, the DEIR states that 55 percent of the Project site is in the Gorman Drainage Area. (DEIR at 5.2-18.) Yet in the Water Quality section, the DEIR states that only 4 percent of the site drains into Gorman Creek. (DEIR at 5.4-4.) The DEIR needs to explain how these statements are consistent or reassess the Project area hydrology. F.8-98

The Project does not adequately analyze the impacts on water quality and biological resources of residential use of pesticides and chemicals associated with the Project. In particular, the DEIR fails to include an analysis – including appropriate surveys – of the aquatic and riparian wildlife present in Gorman Creek, Oso Creek, and Quail Lake. Moreover, because Gorman Creek is within the Santa Clara River watershed (DEIR at 5.2-15), the DEIR should analyze the baseline and potential impacts to aquatic and riparian wildlife in the Santa Clara River. F.8-99

B. The DEIR does not adequately disclose the water quality impacts of the Project.

The DEIR claims that that it will not have any significant impacts to water quality. This likely inaccurate because the Project will install a city adjacent to a lake and multiple creeks, which are home to special status wildlife. The Project will result in the discharge of metals, nutrients, pesticides, organic compounds, sediments, trash and debris, oxygen demanding substances, and oil and grease. These substances will runoff from the site and drain into the adjacent lake and creeks. F.8-100

The Project similarly fails to analyze the impacts on water quality and biological resources of commercial use of chemicals associated with the Project. The DEIR does not list which chemicals will be permitted for use within the Project area, which suggests that any otherwise legal chemicals – including those used for industrial activities – will be permitted onsite. Many of these chemicals can be extremely harmful to wildlife. The DEIR contains no analysis of using such industrial chemicals in a largely undeveloped area surrounded by creeks and wildlife, including the Angeles National Forest. In general, the DEIR claims that adherence to existing regulations will ensure that impacts are not significant. Yet, this is insufficient under CEQA. (*See Californians for Alternative to Toxics v. Dept. of Food & Agric.* (2005) 136 Cal.App.4th 1, 17.) This lack of detail and appropriate mitigation makes it impossible for the public to ascertain the true environmental impacts of the Project F.8-101

C. The DEIR's water quality mitigation measures are vague and inadequate.

While the DEIR provides a list of Best Management Practices ("BMPs") that may reduce impacts, none of BMPs listed are specified as enforceable mitigation measures, which is required under CEQA. The DEIR does not indicate that these mitigation measures are binding on the project or that the project proponent is required to comply. F.8-102

The DEIR fails to adequately analyze the impacts to water quality and wildlife – including from pesticides – of adding tens of thousands of people to an undeveloped area. F.8-103

Moreover, the DEIR claims that it will implement "integrated pest management" or "IPM" and generally references "guidelines established by the University of California Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program. (DEIR at 5.4-30.) The DEIR does not appear to explain or describe those Guidelines, nor does it contain these Guidelines as enforceable mitigation measures or conditions of project approval. F.8-104

Because the project proponent is under no legal duty to adhere to each of the Guidelines, the County cannot and should not rely on this measure to reduce harm to individuals, water quality, or wildlife on or near the Project property. (CEQA Guidelines § 15126.4(a)(2); *Federation of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261 (mitigation measures must be "fully enforceable through permit conditions, agreements, or other measures" so "that feasible mitigation measures will actually be implemented as a condition of development").) Additionally, the DEIR does not point to any study or analysis that would suggest IPM is an effective means to mitigate harm to sensitive species, including amphibians such as the California treefrog, California toad, and black-bellied salamander. Thus, the DEIR fails to present IPM for the Project to interested members of the community from becoming fully informed of the benefits and risks of this form of mitigation. (Cal. Pub. Res. Code § 21002, 21003.) F.8-105

The Project will include 28 on-site detention and retention basins. (DEIR at 5.4-45.) While erosion control measures are important, the DEIR analyze whether these basins may attract or harbor invasive bullfrogs, which are known to harm native wildlife populations. F.8-106

XI. The DEIR Fails To Adequately Analyze Or Mitigate The Impacts Of The Project On Biological Resources.

A. Habitat destruction is a leading cause of extinction.

Species diversity is critical for healthy ecosystems, and ensuring habitat integrity if a key component to species survival. (Dobson 1997.) Habitat destruct or alteration can increase incidents of wildfire and flooding as the ecosystem becomes imbalanced, making it more susceptible to these events. (Brooks 2004; Nilsson 2000.) Developments that convert open space into another use, such as housing, industry, energy or agriculture, negatively impact the species that live in these areas, and the ecosystem as a whole. (Walston 2016; Chaplin-Kramer 2015; Minnich 1998.) Many of the species that have potential to occur in the project area are already imperiled or endangered, and further encroachment onto their habitat worsens the threat to their success and survival. F.8-107

While the entire habitat may not be converted or destroyed through development, it may be fragmented such that it becomes useless as a habitat for particular species. Even if the habitat remains intact, light and noise pollution can negatively impact the health and reproductive rates of species that are sensitive to these types of pollution. (Slabbekoorn 2008; Longcore 2004.) Pollution in the form of pesticides and rodenticides are also a threat, in addition to run-off pollution from roads that impacts water quality and aquatic life and the species that depend on it. (Perez 2007; Miller 2006; Relyea 2005.) Roads create habitat fragmentation since they act as dangerous physical barriers that many species won't cross, or are killed or injured if they do. F.8-108

(Poessel 2014; Ware 2015; Brock 2004; Swihart 1984.) Additionally, roads facilitate the spread of non-native and invasive species, particularly plants and their seeds, which threaten the survival of species native to these areas. (Gelbard 2003.) Fences create another type of habitat fragmentation by reducing mobility and prevent species from accessing all areas that they depend on for survival, or worse, they ensnare the animals that do try to cross them, resulting in injury or death. (Baines 2003; Paige 2008.) For many species, climate change will mean the need for adaptation in the form of migration to new habitats that support their needs. Fragmentation or obstruction of this mobility will result in greater mortality. (Scheffers 2016.)

F.8-108 cont.

Urban infill projects reuse land that has already been disturbed and that is located near urban centers, thus removing the need for conversion of open space for housing, businesses, shopping, roads and other infrastructure. (Wheeler 2002.) These projects are also good candidates for citing distributed solar, further reducing impacts to species and habitat. (Powers 2009.) Wildlife corridors, bridges and underpasses can be constructed in places where roads bisect and disconnect habitat and mobility. (Servheen 2007.) Fences should be used with an understanding of the impacts they have on species mobility, and should be constructed in such a way as to specifically exclude the target species, not all species. Consideration should be given to the type of fencing and the ways in which species could become entangles, injured or killed. (Paige 2008.) Connective corridors between fragmented habitats will enable species to utilize the habitat and retain needed mobility for survival. (South Coast Wildlands 2008.) Alternatives to toxic and poisonous pesticides and herbicides should be used whenever possible to reduce harm to species and their habitats. (Litmans 2004.)

F.8-109

B. The Project Site is unsuitable for development and will the Project will cause significant impacts.

The proposed project site is primarily undisturbed habitat for numerous sensitive species and provides crucial linkages for imperiled terrestrial animals and avian species. For this reason alone, the proposed project area is unsuitable for development and particularly for the intensive type of suburban sprawl proposed in the DEIR where a new city of approximately 20,000 houses along with significant commercial and industrial development and all the requisite infrastructure will be constructed. The Centennial proposal reflects 20th century development concepts that have created unsustainable communities that impact and fragment crucial open space, wildlife connectivity and imperiled species habitat. We urge the County to withdraw this proposal and focus on crafting sustainable development within the County in order to meet human development goals while sustaining the ability of natural systems to continue to provide the natural resources and ecosystem services upon which our local economy and society depend.

F.8-110

The DEIR's conclusion that "Project impacts are considered less than significant after mitigation." (DEIR at 5.7-195) are not supported by the DEIR. We discuss the reasons below:

F.8-111

In general, the DEIR goes to great lengths in interpreting the collected data to downplay the uniqueness of the proposed Centennial area. Three ecoregions – the Sierra Nevada, the Mojave Desert, and the South Coast – converge in the proposed project area.[10] Few other

F.8-112

[10] Conservation Biology Institute and South Coast Wildlands 2006. Proposed Reserve Design for Tejon Ranch - A Threatened California Legacy. Pgs. 43 http://www.scwildlands.org/reports/ProposedReserve_TejonRanch.pdf

F.8-112A

locations in California have the distinction of three ecoregions converging.[11] These ecoregions are the manifestation of the convergence of California's two largest earthquake faults – the San Andreas Fault, the largest fault in California that runs southeast to northwest through the proposed project site, and the Garlock fault, the second largest fault in California that runs northeast to southwest and intersects the San Andreas fault at the "Big Bend" considered to be the most significant tectonic area in California.[12] This unique location and geological structure that gives rise to the unique soil horizons create the conditions that support unique biological and botanical resources that occur on the proposed project site. Those unique features coupled with the historic and contemporary land management has kept much of the botanical resources in place.

F.8-112 cont.

The DEIR however obfuscates the uniqueness of the proposed project site, particularly of the grasslands and wildflower fields that the proposed project will destroy the very heart of by focusing so closely on highly detailed mapping instead of the value of the intact grassland as a whole. As a metaphorical analogy, the DEIR loses the forest by focusing only on individual trees. Indeed one of the reports included in Appendix 5-7-b as Plant 2 states:

> "The perennial bunchgrass community on the site covers approximately 5,500 continuous acres distributed across a distinct geomorphic feature consisting of weathere ridges and terraces from old and very old alluvium. The stand has minimal intrusion of introduced annual grasses and a high richness of bunchgrass species. Six different species occur within the greater stand. Four of these are either dominant or subdominant and form a complex matrix with semi-predictable distribution patterns across the ridges and terraces based on landscape position" (at PDF pg. 641)

F.8-113

Interestingly, in 2008, the Center attended a Los Angeles County Significant Ecological Area Technical Advisory Committee meeting and received from the County a prior final version of the Vollmar report than the version that is included in the DEIR. We submit the version that we received from the County as Exhibit B. The reason that we submit it is because the conclusions reached are different from the conclusions included in the DEIR's version, and this discrepancy we will discuss further below.

F.8-114

The proposed mitigation strategy is inadequate because it tries to justify the development of habitat for the rare species and plant communities and proposes to mitigate the impacts through set aside of lands that have little data documenting adequacy of supporting the botanical and biological resources that are proposed to be impacted. In other words, the information provided in the DEIR is unclear that the proposed mitigation will actually mitigate the species- and habitat- specific impacts. Additionally, three of the proposed mitigation areas already have conservation easements on them because California's Wildlife Conservation Board paid the Tejon Ranch Company $15.8 million dollars to place conservation easements over 62,003 acres of the ranch and 12,145 of those acres are now proposed to be used as mitigation (DEIR at exhibit 5.7-10) for the proposed Centennial project. California taxpayers should not be paying for mitigation of a private company's development. In addition the "on-site" mitigation areas

F.8-115

[11] https://calswap.wordpress.com/2013/06/

[12] http://www.sci.sdsu.edu/salton/San%20AndreasFaultSyst.html

F.8-112B

F.8-112C

appear to only be included in the proposed project area so that they can be set aside as "mitigation". F.8-115 cont.

This shell game of "mitigation" is obvious and only allows wholesale destruction of habitat that should be avoided. When the 12,145 acres of already conserved lands are subtracted out of the proposed mitigation lands, the project effectively only proposes 15,267 acres (11,402 acres of off-site mitigation and 3,866 acres of "on-site" mitigation) (DEIR at exhibit 5.7-10). Because the proposed project area is 12,323 acres with 3,866 acres being "on-site" mitigation, the actual impact area (recognizing the impact level varies) would be 8,457 acres. The DEIR proposes an unrealistic mitigation of impacts for resident rare and common species, including landscape connectivity of only 1.8:1 (conserved:developed). Because habitat is already inhabited and used by the same species for which mitigation is sought, this mitigation strategy ensures a *net decrease* in habitat for impacted species. To actually provide mitigation that lessens species' habitat losses, mitigation ratios must be actually address the impacts to each species and unique habitat type and must be high enough to fully mitigate the impacts to those species.[13] A *minimum* 3:1 (conserved:developed) mitigation is more appropriate for this very threatened landscape and rare species. A 3:1 ratio (conservation:development) also helps to assure that project impacts are mitigated appropriately but also that the net losses of habitat for rare species are decreased. It would also help to allay fears that the proposed mitigation actions, for which plans will be written in the future will actually work (see discussion below on missing plans). This strategy is also essential to prevent future listings under Endangered Species Acts – both state and federal. F.8-116

C. The DEIR fails to adequately describe the environmental baseline.

Field Surveys

The DEIR and appendices document the intermittent survey efforts on various areas of the proposed project site between 1999 and 2015, however, most of the surveys were not comprehensive in nature i.e. they did not cover the whole project site but instead often focused on specific habitats. While this may be appropriate for certain species, as the County recognizes, this area has been understudied by biologist and botanists due to lack of access. Because of the geographic uniqueness of the area, it is surprising that the diversity of animal species in particular is so low, but not surprising that the diversity of plants is high. While the DEIR is unsuccessful in synthesizing the data into a comprehensive overview of the biological resources, as mentioned above, the synthesis also downplays the landscape-scale uniqueness of the landscape. F.8-117

Botanical Resources

[13]Moilanen, A., A.J.A. van Teeffelen, Y. Ben-Haim and S. Ferrier. 2008. How much compensation is enough? A framework for incorporating uncertainty and time discounting when calculating offset ratios for impacted habitat. Restoration Ecology 17(4): 470-478 http://www.academia.edu/download/42103667/pdf.pdf ; Norton, D.A. 2008. Biodiversity offsets: two New Zealand case studies and an assessment framework. Environmental Management 43(4):698-706. http://docketpublic.energy.ca.gov/PublicDocuments/Regulatory/11-AFC-2%20Hidden%20Hills/2013/FEB/TN%2069406%2002-04-13%20Intervenor%20Center%20for%20Biological%20Diversity's%20Testimony,%20Exhibit%20List%20and%20Exhibits/Exhibit%20502.%20Norton%202009.%20Envt%20Mgt.pdf F.8-116A

Section 5.7, entitled "Biological Resources," in the EIR devotes significant effort to characterizing the onsite grasslands, which includes Native Perennial Grasslands ("NPG") and Wildflower Fields ("WFF"). The high quality of the NPG and WFF on the site were first documented in the Vollmar Consulting 2003/2004 study. The project proponent subsequently hired Natural Resource Consultants ("NRC") to conduct a follow-up study in 2006/2007 that was intended to be a more rigorous and objective as a basis for quantifying the quality and potential impacts to these habitats. F.8-118

The following comments from our review of the EIR need to be more fully addressed in the DEIR:

1) Because plants communities are often highly correlated with soil types and their underlying geological formations, the Vollmar Consulting study (Appendix 5-7b, Plant-2) included geologic formation as a fundamental parameter for understanding the distribution and quality of NPG on the site that is lacking in the subsequent grassland analysis and in the DEIR itself. The influence of geology and soils on plant community distribution and variations in plant species diversity and richness within a plant community on a local scale is broadly acknowledged as a foundational concept in vegetation ecology. During the 2003 field surveys conducted by Vollmar Consulting, the team anecdotally observed a clear difference in the size and quality of NPG and WFF stands in different areas of the Project site supporting grasslands. In particular, the team observed that the Continental Deposits and Terrace Deposits geologic formations in eastern portion of the site between Highway 138 and the northern Project site boundary appeared to support much larger contiguous stands of NPG and WFF and also supported a much higher number of native grass and forb species. This distribution appears to be due to the unique combination of geology and topography within these geologic formations in this portion of the Project site. This specific area supports a landform with generally east-west trending ridges and associated valleys that provide a maximum diversity of landscape positions and thin upper slope and ridge top soils able to support a high diversity and cover of native grass and forb species. These conditions are not replicated elsewhere in the local region. On the south side of Highway 138, the mapped Continental Deposits generally slope north. North of the project site, the mapped Continental Deposits and Terrace Deposits generally slope south. Both areas (especially to the north) generally lack the extensive and well-developed ridges that support high diversity NPG and WFF in the central eastern portion of the Project site. The western portion of the Project Site supports a different set of geologic formations with soils that are generally less weathered and windblown which reduces habitat suitability and quality of the NPG and WFF habitats. This distribution of different geologic formations on the proposed project site brings into question the evaluation of the grasslands in the areas proposed to be developed versus the areas that would provide mitigation for the developed areas. F.8-119

2) The Vollmar Consulting report describes in detail the unique geologic and topographic characteristics in the central eastern portion of the Project site and how these characteristics relate to the exceptional quality of the NPG and WWF in this area. For F.8-120

reasons that are unclear, NRC opted not to include geology or soils as part of their study. This omission strongly compromises the study results and also prevents the ability to differentially characterize the quality of the NPG and WWF in different areas of the Project site. The analysis should be redone with the data stratified by geologic formation (as well as the other parameters already included). This approach would strongly improve the accuracy of the habitat model to predict the cover of native perennial bunch grasses ("NPBG") in different landscape positions. The current study achieved only a 37% predictive accuracy in NPBG cover with four cover classes. A re-analysis including geology would show that the central eastern portion of the Project site in fact supports much higher quality NPG and WFF in terms of native grass and forbs species richness and diversity than other portions of the site.

F.8-120 cont.

3) Paragraph 2 on Page 5.7-25 (Delineation of Grasslands section) in the DEIR's Biological Resources section states that there is no accepted definition of NPG but that a commonly accepted standard is to identify native grasslands as areas with 10-20 percent cover of native grasses. The paragraph then goes on to state that, given historical uncertainty, the standard definition was not used but that a specific definition was developed for the NRC analysis that incorporates regional and site-specific information. However, the DEIR never provides a formal definition of what constitutes NPG for the purposes of the study and mitigation analysis. The DEIR needs to be revised to include a formal definition of both NPG and WFF and those definitions need to be used in the analysis of impacts and mitigation.

F.8-121

4) The Vollmar Consulting and NRC studies differ in their approach to cover with the former using relative cover and the latter using absolute cover. While either approach can be justified, the Vollmar Consulting report records and analyzes the high cover of bare soil in high quality NPG areas which makes relative cover an important metric. Also, the 'bare soil' areas can have a high cover of native forbs (WFF) during favorable rain years (such as 2003). The NRC study should have also considered relative cover values as a metric of the relative contribution and prominence of native grasses (as well as native forbs) within the grassland habitats.

F.8-122

5) As a general comment, characterization and mapping of WFF within the Project site is largely missing and appears to be well below the level of analysis required to accurately assess impacts and mitigation within an EIR. WFF is a recognized sensitive plant community as the DEIR notes (at pg. 5.7-158) – requiring the same level of consideration as the sensitive NPG – but there is almost no analysis or discussion of the distribution, species richness, stand size, habitat acreage calculation, etc. of this plant community within the proposed project site. The Vollmar Consulting study found exceptional species richness of native forbs within the Project site, especially within NPG habitat on the Continental Deposits and Terrace Deposits in the central eastern portion of the site. During the 2003 plot sampling, all forb species within each plot were recorded. A total of over 70 native species were recorded, an exceptionally high number within a local California grassland community. The study also found that the level of native forb richness and cover was positively correlated with increasing NPG cover. The NRC study and Project EIR treats the WFF habitat very differently. On Page 5.7-41 in the EIR, a

F.8-123

statement reads as follows: "Wildflowers are typical for this type of vegetation (both native perennial and non-native annual grasslands), and their density varies from year to year." This statement, which is consistent with the overall poor treatment of WFF habitat in the DEIR, implies the wildflowers generally occur in the native and non-native grasslands throughout the site with no real distinction. In fact, the Vollmar Consulting study found very distinct distribution patterns in the richness and cover of native wildflowers with the non-native grasslands having a generally low cover and richness and the NPG having a generally high cover and richness. The NRC study needs to be revised to include a much more rigorous analysis of the WFF habitat, including a consideration of geology as well as the other parameters used in the analysis of NPG. Such an analysis would show that the central eastern portion of the Project site within the Continental Deposits and Terrace Deposits supports exceptional WFF habitat with much larger contiguous stands and a much higher species richness than WFF habitat in the western portion of the site.

F.8-123 cont.

6) Table 5.7-3 and 5.7-11 summarize the different vegetation types and acreages within the Project Site. In both tables, all vegetation types are presented at the Alliance level (based on Keeler-Wolf) - except for "Grass and Herb-dominated Vegetation Types." Instead, this type is identified as "Native Perennial Grassland/California Annual Grassland." This lumping is done in spite of the fact that grasslands occur over more than 9,000 acres (70%) of the Project site and include at least two distinguishable sensitive plant community types subject to EIR review – NPG and WFF. NRC completed a detailed study of NPG (but not WFF) that yielded a map of predicted distribution. Also, the data were collected in a manner that alliance level vegetation types for NPG and WFF can be described and mapped. As currently treated, the lumping has the effect of dismissing NPG and WFF as an inextricable component of the overall grassland habitat on the site. This approach is carried through on Exhibit 5.7-1 that shows undifferentiated 'grasslands' within the Project site. Nowhere in the DEIR is there a map showing the distribution of NPG (or WFF) within the Project site. Also, there is no definition in the DEIR of what constitutes NPG for the purposes of this Project though the standard definition is explicitly rejected as described above. The DEIR needs to be revised to provide specific definitions of NPG and WFF and a map needs to be prepared showing the specific distributions of these vegetation types based on these definitions. Based on the Vollmar Consulting study, it is appears that the distribution of WFF is closely correlated with the distribution of NPG and it may be appropriate to map both vegetation types together where NPG occurs. The current treatment of inexplicably lumping the NPG, WWF and non-native grasslands together effectively devalues the uniqueness of the NPG and WWF as separate and sensitive plant alliances. Accurate alliance mapping is absolutely necessary in order to apply the appropriate avoidance and minimization measures. It impacts are still proposed, adequate mitigation can only be proposed if the impacts are accurately analyzed.

F.8-124

7) The treatment of NPG and WFF are further downgraded in the mitigation sections of the EIR. The mitigation for impacts to NPG and WFF is lumped under generic 'grassland' mitigation within the proposed preserves (see Table 5.7-12). However, based on the discussion above of the uniqueness of the NPG and WFF within the central eastern

F.8-125

portion of the Project site due to the regionally unique geomorphic setting, and the apparent flaw in the NRC study in omitting geologic/soils as a parameter in the analysis, it is not at all clear that the proposed mitigation preserves replace the NPG and WFF habitat values that will be lost on the proposed project site. The mitigation analysis needs to be revised based on a revised NRC analysis that includes geology in the analysis and a subsequent revised analysis of NPG and WFF habitat within the Project site. The results of the revised NRC analysis can then be compared to habitat conditions within the proposed preserves to determine if, in fact, they support similar resource values as the Project site. Based on the data in Appendix 5.7b, the results may show that the central eastern portion of the proposed project site actually supports very unique NPG and WFF habitat that is of higher quality in terms of species richness than the NPG and WFF habitats on most or all of the proposed preserves.

F.8-125 cont.

8) The Vollmar Consulting study notes that one of the exceptional characteristics of the NPG habitat in the central eastern portion of the Project site is the size of the contiguous stands. As part of the study, the team research and visited other known stands of NPG in California and found that the stand within the Project site far exceeded the size (and in many cases the quality) of all other known occurrences at the time. Since the Vollmar Consulting study was completed, extensive NPG habitat has been documented along the lower flanks for the Tehachapi Mountains to the north and northeast of the Project site. However, as noted above, these stands seem to be very different from the NPG within the proposed project site. The slopes are mostly south-facing and there is a general a lack of the ridge tops and broad slope/landscape position diversity that drives the exceptional native species richness within the Project site. The concept of NPG stand size is briefly touched in in the DEIR on Page 5.7-159. This section notes that NPG has been reduced to perhaps 0.1 percent of its historical (pre-European) extent, making it one of the rarest and most endangered vegetation types in California. It also notes:

> "***from either a statewide or regional perspective, the quality and extent of native perennial grasslands on the site is excellent.*** Most of the remaining stands in the southern California area are generally small (less than 100 acres) and isolated in widely scattered areas". (Emphasis added.)

F.8-126

Given this reality, the loss of several thousand acres of what constitutes some of the highest quality remaining NPG habitat in the state should be considered a non-mitigable significant impact, regardless of the acreage of preserved habitat set aside as mitigation. This section of the DEIR does discuss the roughly 22,000 acres of NPG habitat mapped along the lower flanks of the Tehachapi Mountains north and northeast of the Project site. However, the NPG (and WFF) habitat on the Continental Deposits and Terrace Deposits within the proposed project site appears to be very different from the other NPG habitats in the region due to the unique geomorphic setting within the Project site as discussed above.

F.8-127

D. The DIER does not adequately mitigate the Project's impacts on rare plants.

The DEIR reports numerous rare plant species and substantial impacts to some of those species from the proposed project. Many of these plants are associated with the unique

F.8-128

grasslands on the site. Numerous populations of the California androsace, crownscale, round-leaved filaree, Mojave spineflower, sylvan scorzonella, and adobe yampah, will be impacted by the proposed project and it is appropriate that the County is recognizing that despite not being under Endangered Species Act protections but because they are rare in the County and in a botanically underexplored area, mitigation is necessary. However, the DEIR relies on Mitigation Measure 7-1 for all these species to mitigate the impacts from the development of the proposed project to less than significant levels. Unfortunately MM 7.1 defers surveys of mitigation lands to confirm the presence and populations numbers or absence of the species to the future (DEIR at 5.7-173). It also requires a Special Status Plant Species Restoration Plan, which actually needs to be included as part of the DEIR, so that the public can be informed about the methodology that is being proposed and comment on it (see section on missing plans below). While the criteria laid out in the second paragraph on pg. 5.7-174 is helpful, it still does not inform the public and decision-makers on how those criteria will be addressed successfully and if the plan is actually feasible. We have seen poor plans implemented multiple times and fail. We have seen agencies allow the developer to then walk away from the mitigation, after spending significant funds on an ill-conceived plan that was never available for public review.

F.8-128 cont.

Furthermore the DEIR states that "Adoption of this plan shall be used as the performance standard" (at pg. 5.7-174) which is unfathomable. Adopting a plan is not mitigation. There needs to be a *requirement for implementation* and safeguards that require successful mitigation to actually be achieved. We are particularly concerned about this issue because the track record for enhancing/re-establishing or establishing new populations of rare plants is abysmal, particularly the long term, with a success rate of mitigation-related transplantation, relocation, and reintroduction attempts being only being 8%.[14]

F.8-129

MM 7-1 also states "An overview of the plan objectives is provided in the Biological Resource Mitigation Program to be submitted and approved by the County prior to issuance of grading permits." However, we were unable to locate a Biological Resource Mitigation Program in the DEIR. Such a Program's availability during the environmental review process is key for decision-makers and the public to be able to understand the strategy proposed for mitigation. Instead the DEIR appears to be relegating this foundational program to a behind-closed-door review and adoption after the project is permitted.

F.8-130

The DEIR is mute on the management of the mitigation lands for plants, which of course is key to effective mitigation. The Mitigation Preserve Review (Appendix 5.7-c) does not include the current management of the on- and off-site mitigation areas. We are concerned that the Ranch Wide Management Plan[15], which focuses on cattle grazing as the primary management tool, will be the management document for the mitigation lands which is not appropriate.

F.8-131

E. The DIER does not adequately mitigate the Project's impacts on Oaks.

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[14] *Fiedler, P.L. 1991. Mitigation Related Transplantation, Relocation, and Reintroduction Projects Involving Endangered and Threatened and Rare Plant Species in California. Final Submitted to the California Department of Fish and Game – Endangered Plant Program. June 14, 1991. Pgs.144.*
https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=3173

F.8-129A

[15] http://www.tejonconservancy.org/rwmp.htm

F.8-131A

Results from the oak surveys on the proposed project site indicate that not only does the site have great diversity of oaks – ten different species– but that it is a living laboratory of oak hybridization (Appendix 5-7-b, Plant-10). F.8-132

However, neither the Oak Woodland Mitigation Plan nor the Oak Maintenance Plan are available for public review as part of the DEIR. MM 7-11 gives some guidance on requirements for the plan. Yet, it does not include performance criteria for the to-be-developed Monitoring Plan (at 5.7-186). If oaks are impacted from the proposed project construction, we support mitigating with local propagules. However, we failed to see any criteria that required that the mitigation reflect the species-specific or hybrid-specific impact (i.e. if 50% of the impact occurred to blue oaks, then 50% of the required mitigation be of the successful establishment of blue oaks), or that the ultimate creation of mitigation woodlands replicate the species/hybrid make-up of the oak woodlands that will be destroyed. F.8-133

Absent the actual plans, decision-makers and the public can not actually evaluate the effectiveness of the plans in achieving adequate mitigation. F.8-134

Appendix 5-7-b, Plant-11 recommended including Alternative G – Reduction of Oak Woodland Impact Alternative. However, this Alternative was not included in the Alternatives analysis. It should be included and analyzed in the revised and recirculated EIR for all the benefits that it would provide, not only to oaks but to the species that depend on them. F.8-135

F. The DIER does not adequately mitigate the Project's impact on wildlife

As stated above, while the site does support numerous rare and common wildlife species over the 12,323 acres site, the paucity of on-site wildlife species is striking. This may be attributed to current management of the site, and that and other factors must be taken into consideration when evaluating the potential impacts from the proposed development. Based on the wildlife reported on site in the DEIR, we have the following concerns: F.8-136

State fully Protected Species

Four rare species that were documented on the project site or directly adjacent are fully-protected species under California law (Fish and Game Code §5050)[16], meaning that individuals of the species may not be "taken" (as defined in the Fish and Game Code) at any time, unless and Natural Communities Conservation Plan is prepared and implemented. These species include California condor (Appendix 5-7-b, Birds-6 and Birds-10), golden eagle (Appendix 5-7-b, Gen-6 and other places), bald eagle (Appendix 5.7-b, Gen-6, and Birds-1)- although it was not identified in the DEIR, and the white-tailed kite (Appendix 5.7-b, Gen-6 and Birds-1) , Therefore all mortal impact must be avoided. F.8-137

[16]CDFW 2017 California's Fully Protected Species List. http://www.dfg.ca.gov/wildlife/nongame/t_e_spp/fully_pro.html F.8-137A

a. California Condor

The California condor recovery efforts, despite setbacks, are a success[17] and California condors continue to expand their populations in the wild and re-inhabit historic habitat, including Tejon Ranch and the proposed project area. F.8-138

The DEIR documents the presence of California condors on the proposed project site in surveys from 1999 to 2004 (Appendix 5-7-b, Birds-1) and through telemetry data from the 1990s to the present (Birds-6 and Birds-10). The telemetry data confirms flyovers of the proposed project site by telemetered birds and the DEIR reports an observed landing of a condor (at pg.5.7-119). Despite the DEIR's statement that "All California condors are wing-tagged and fitted with radio transmitters" (at pg. 5.7-148), the DEIR is wrong - not all California condors are radio-telemetered, and although a subset do have GPS units, some condors only have wing tags. The most recent publicly available data set that we have accessed - cellular GPS from March 31, 2017 - continues to show consistent use of the proposed project site by California condors. F.8-139

The Cogan report (2009)[18] includes not only location data on condor sitings and GPS locations, but also flight lines of condors over the Tejon Ranch, including the proposed project area. These data provide additional information on how condors have used the proposed project area. F.8-140

The DEIR downplays the potential serious impact that the proposed project may have on the California condor. The DEIR erroneously concludes that "Project implementation is not expected to result in any impacts on these two species and no mitigation is required" (at pg. 5.7-119) - the two species referenced are condors and bald eagles. This conclusion is in direct conflict with the data and analysis in Appendix 5-7-b, Birds-6 which states "indirect effects associated with the development and operation of the site, as defined by CEQA, could potentially occur." (at PDF pg. 1611). The report continues, stating "these effects can be substantially reduced and/or eliminated through project design features and implementation of various mitigation and conservation measures, including the provision for additional radio telemetry transmitters to be affixed to free-flying condors that may reduce the potential for mortality of individual condors, provide more insight into overall condor health and mortality issues, and ultimately aid in the recovery of the species." (at PDF pg. 1611) Yet the DEIR ignores this recommendation and fails to include it as part of the mitigation package to help reduce impacts to California condor. F.8-141

The DEIR does include MM 7-6 which addresses construction-related safeguards for condors (microtrash, litter, vehicle fluids, and food waste removal), and the implementation of APLIC standards for antennae and phone/utility lines. It also requires the removal of "dead cattle that are found or reported within 1,000 feet of the boundary of a residential or commercial development" (at pg. 5.7-178) but fails to provide a timeline for how quickly the removal must F.8-142

[17] USFWS 2015. California Condor Recovery Program 2015 Annual Condor Population Status Update. Pgs. 6. https://www.fws.gov/cno/es/pdf%20files/Ca-Condor-Recovery-Prog2015PopulationStatus.pdf F.8-138A

[18] Cogan, Christopher B. 2009. California Condor Activity in the Tejon Ranch Region. Center for Biological Diversity Report, 12 June 2009. San Francisco, CA, USA. 22pp. http://www.biologicaldiversity.org/species/birds/California_condor/pdfs/CondorActivityInTheTejonRanchRegion.pdf F.8-140A

happen after reporting occurs. It also fails to address the long-term impacts of microtrash, litter, vehicle fluids, and food waste as 55,000+ people move into the area if the project moves forward.

F.8-142 cont.

While the whole of Tejon Ranch is critical to the survival and recovery of the California condor, this species is in such dire circumstances and requires such large swaths of habitat that each acre of occupied habitat contributes to its ongoing recovery. The development of natural foraging habitat reduces the amount of contiguous habitat and could cause a range contraction – just what the California condor can't afford. The erroneous determination in the DEIR that project implementation will not result in any impacts to condors is not supported in the DEIR or its appendices. Because of the inadequacy of impact analysis and resulting mitigation measures for the critically imperiled California condor, the County needs to vastly improve the avoidance, minimization and mitigation measures in a supplemental and recirculated DEIR.

F.8-143

b. Golden eagles

Golden eagles were documented foraging on the project site (DEIR at pg. 5.7-150) and the DEIR states that "nesting has not yet been documented on the Project site". However, apparently no aerial nest surveys were done in the area. Currently in other areas in California, USFWS is requiring surveys within 10 miles of a proposed project site in order to document nest sites. The DEIR goes on to state "Project implementation would result is the loss of approximately 6,416 acres of foraging habitat for these raptors that would be considered adverse, but less than significant" (at pg. 5.7-150), where "these raptors" include golden eagles, northern harrier and white-tailed kites. The fact remains that significant amounts of foraging habitat will decrease carrying capacity of the landscape and could result in a potential loss of habitat needed to support a nesting pair of golden eagles, which would impact reproductive capacity of golden eagles and result in "take". In addition, numerous other known causes of golden eagle mortality will be introduced into the area from the development, including potential poisoning, collisions, electrocutions and others[19]. The erroneous determination in the DEIR that project implementation will not result in any impacts to golden eagles is not supported in the DEIR or its appendices. Instead the DEIR relies on MM 7-6 which suffers the same inadequacies discussed above regarding condors. Indeed MM 7-6 addresses construction impacts primarily associated with condors (microtrash, litter and vehicle fluids), which thankfully golden eagles are not as vulnerable to, but fails to address the impacts that eagles are vulnerable to, including poisoning, collisions and electrocutions.

F.8-144

Scientific literature on this subject is clear - the presence of humans detected by a raptor in its nesting or hunting habitat can be a significant habitat-altering disturbance even if the human is far from an active nest.[20] Regardless of distance, a straight-line view of disturbance affects raptors, and an effective approach to mitigate impacts of disturbance for golden eagles involves calculation of viewsheds using a three-dimensional GIS tool and development of

F.8-145

[19] USFWS 2016. U.S. Fish and Wildlife Service. 2016. Bald and Golden Eagles: Population demographics and estimation of sustainable take in the United States, 2016 update. Division of Migratory Bird Management, Washington D.C., USA. Pgs 115. https://www.fws.gov/migratorybirds/pdf/management/EagleRuleRevisions-StatusReport.pdf

F.8-144A

[20] Richardson, C.T. and C.K.Miller 1997. Recommendations for protecting raptors from human disturbance: a review. Wildlife Society Bulletin 25(3):634-638 http://docketpublic.energy.ca.gov/PublicDocuments/09-AFC-07C/TN200071_20130729T152048_CBD's_Comments_on_PSA_Final__Attachment_15.pdf

F.8-145A

buffers based on the modeling.[21] Golden eagles have also been documented to avoid industrialized areas that are developed in their territory.[22] Additionally, the DEIR does not actually clearly analyze the impacts to and mitigations for the golden eagle under the Bald Eagle and Golden Eagle Protection Act, which prohibits, except under certain specified conditions, the take, possession, and commerce of such birds. Due to the potential impact to golden eagles from the proposed project development, the project proponent needs to apply for a "take" permit for golden eagles under the Bald Eagle and Golden Eagle Protection Act.

F.8-145 cont.

c. Bald Eagle

Bald eagles have been documented to use Quail Lake which is directly adjacent to the proposed project area. (DEIR at 5.7-121.) No estimation of the amount of suitable foraging, roosting or nesting habitat is present on the site or how much will be impacted is provided in the DEIR. As with the California condor, the DEIR determines that the proposed project is not expected to result in any impacts to golden eagles (at pg. 5.7-148), yet the DEIR provides no support for this conclusion. Instead it relies on MM 7-6 which suffers the same inadequacies discussed above regarding condors. Indeed MM 7-6 addresses construction impacts primarily associated with condors (microtrash, litter and vehicle fluids), which thankfully bald eagles are not as vulnerable to, but fails to address the impacts that bald eagles are vulnerable to, including poisoning, collisions and electrocutions.

F.8-146

No mention is made in the DEIR about limiting access in and around roosting/nesting sites. The scientific literature supports restrictions from 250 meters to 400 meters[23] and maybe more depending on numerous factors that affect behavior. A larger management zone from 1,360-1400 m has been prescribed in the scientific literature for non-breeding bald eagles roosting sites.[24] CEQA requires that this issue be addressed.

F.8-147

As with the golden eagle, the DEIR does not actually clearly identify the impacts to and mitigations for the bald eagle under the Bald Eagle and Golden Eagle Protection Act.

F.8-148

d. White-tailed kite

The white-tailed kite is documented on the proposed project site. (DEIR at 5.7-150) The DEIR states "Project implementation would result is the loss of approximately 6,416 acres of

F.8-149

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[21] Camp R.J., D.T. Sinton and R.L.Knight. Viewsheds: a complementary management approach to buffer zones. Wildlife Society Bulletin 25(3): 612-615 http://docketpublic.energy.ca.gov/PublicDocuments/09-AFC-07C/TN200060_20130729T145348_CBD's_Comments_on_PSA_Final__Attachment_4.pdf ; Richardson, C.T. and C.K.Miller 1997. Recommendations for protecting raptors from human disturbance: a review. Wildlife Society Bulletin 25(3):634-638

F.8-145B

[22] Walker, D., M. McGrady, A. McCluskie, M. Madders and D.R.A. McLeod 2005. Resident Golden Eagle Ranging Behaviour Before and After Construction of a Windfarm in Argyll. Scottish Birds 25: 24-40. http://www.natural-research.org/projects/documents/SB25-EAGLESDOC.pdf

F.8-145C

[23] Stalmaster, M.V. and J.R. Newman 1978. Behavioral responses of wintering bald eagles to human activity. Journal of Wildlife Management 42(3): 506-513; Craig, G.R. 2002. Recommended buffer zones and seasonal restrictions for Colorado raptors. Prepared By Colorado Division of Wildlife, Updated December 19, 2002. Pgs 7. https://cpw.state.co.us/Documents/WildlifeSpecies/LivingWithWildlife/RaptorBufferGuidelines2008.pdf

F.8-147A

[24] Buehler, D.A., T.J. Mersmann, J.D. Fraser, and J.K.D. Seegar. 1991. Nonbreeding bald eagle communal and solitary roosting behavior and roost habitat on the northern Chesapeake Bay. Journal of Wildlife Management 55(2): 273-281.

F.8-147B

foraging habitat for these raptors that would be considered adverse, but less than significant…" (DEIR at 5.7-150.) "These raptors" include golden eagles, northern harrier and white-tailed kites. The fact remains that significant amounts of foraging habitat will decrease carrying capacity of the landscape and could result in a potential loss of habitat needed to support a nesting pair of white-tailed kites, which would impact their reproductive capacity and result in "take". Therefore the DEIR is inadequate in disclosing all the environmental impacts. This deficiency needs to be included in a supplemental EIR.

F.8-149 cont.

e. Swainson's hawk

Antelope Valley is the southernmost portion of the current California Swainson's hawk breeding range. Recent data indicate that conversion of agricultural land and open space to other uses including solar power projects and other types of development is threatening the Antelope Valley Swainson's hawk population and its possible future expansion and identifies the remaining breeding territories in the Antelope Valley as tenuous and likely to be extirpated[25]. However, during numerous surveys on the proposed project site, Swainson's hawks were documented from 2000 through 2016. (DEIR at 5.7-148). While all of the Swainson's hawks documented on the proposed project site were identified as migrating birds, some were also noted to be foraging. (DEIR at 5.7-148.)

F.8-150

While the DEIR states "Project implementation would result in the loss of habitats used by migrating Swainson's hawks, occasional non-breeding birds in summer, and potentially suitable nesting habitats in the eastern portions (i.e., alfalfa fields and surrounding trees) of the Project site" (at pg. 5.7-149), it then concludes, without any support in the DEIR that "these impacts are considered adverse but less than significant and no mitigation is required." (at pg. 5.7-149). MM 7-2 does require pre-construction protocol surveys on the project site for Swainson's hawks nests, but the DEIR fails to provide any analysis of impacts to this highly imperiled Antelope Valley breeding population of Swainson's hawks, much less any avoidance, minimization or mitigation if impacts are identified.

F.8-151

f. Ringtail

One of the fully protected species whose range overlaps with the proposed project site[26] is the ringtail (*Bassariscus astutus*) however, no surveys were implemented, no estimate of on-site habitat is provided, and no analyses of impacts discussed and for this secretive species. While ringtail are not common within the general area of the proposed project (CDFG 1980), the DEIR still needs to evaluate potential habitat for this unique and fully protected species in a revised and recirculated DEIR

F.8-152

Threatened, Endangered and Candidate Species

a. Willow Flycatcher, Least Bell's Vireo and Western Yellow-billed Cuckoo

While all three of these bird species were identified on the proposed project site, all were determined to be migrants. (DEIR at 5.7-148). The DEIR determines that the flycatcher species

F.8-153

[25] http://www.wildlifeprofessional.org/western/tws_abstract_detail.php?abstractID=764

F.8-150A

[26] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2582

F.8-152A

that was present on site was not a federally endangered southwestern willow flycatcher because of the time of year that the birds were detected and their subsequent disappearance from the proposed project site. However, all subspecies of willow flycatchers (*Empidonax traillii*) are listed as state endangered species[27], which the DEIR fails to mention. The DEIR also appears to downplay the presence of the birds on the proposed project site by dismissing the importance of the habitat resources for these threatened or endangered migratory birds. Based on that erroneous perspective, the DEIR concludes that "the Project site is not considered to be occupied by the western yellow-billed cuckoo, southwestern willow flycatcher, or least Bell's vireo." (at 5.7-148) Clearly this statement directly conflicts with the survey results, where these species were documented to occupy the site, granted without documented nests on site. However, in order for these migratory birds to reach breeding sites, migration habitat must be present in order to provide adequate resources (food, roost sites etc.) to sustain them. The DEIR then erroneously states that "Project implementation is not expected to impact these three listed species and no mitigation would be required." (DEIR at 5.7-148) but fails to provide any analysis of the impacts in order to reach that conclusion.

F.8-153 cont.

Ultimately the DEIR does recognize the fact that these highly imperiled birds do occur on site and states "Since all three of these listed species are migratory, however, and may occur as breeders in the future, MM 7-5 is included to conduct pre-construction protocol surveys for the western yellow-billed cuckoo, southwestern willow flycatcher, and least Bell's vireo to confirm absence prior to disturbance." (DEIR at 5.7-148.) However MM 7-5 actually fails to requires surveys for the western yellow-billed cuckoo. (DEIR 5.7-177.) Furthermore, the DEIR fails to evaluate the impacts to these migratory species that may occur on-site as breeders in the future from development itself and the influx of 55,000+ human residents and their pets. While dogs are proposed to be required to be on leash in conserved areas (DEIR at 5.7-169), and DEIR recognizes the impact that free-roaming cats can have on the native fauna (DEIR at 5.7-169), the only requirement for domestic pets is that they be spayed (DEIR at 5.7-169). While we support spaying pets for all the benefits it provides, the DEIR must incorporate a requirement to keep domestic cats indoors at all times to reduce the impacts not only to threatened and endangered birds, but to other species as well.

F.8-154

a. Tricolored Blackbird

The tri-colored blackbird is currently a candidate species under the California Endangered Species Act, due to historical and continuing loss of nesting substrate and upland foraging area, continuing declines in the populations and Significant, large-scale reproductive failures in tricolored blackbird colonies nesting in agricultural areas of the San Joaquin and Sacramento valleys. The DEIR states "The tricolored blackbird was observed nesting in large numbers along the north-central edge of the Project site and was also observed in Oso Creek (BonTerra Consulting 2008; Impact Sciences 2004a)" and "Five distinct breeding colony locations were detected in the bulrush vegetation on the shores of Quail Lake" (DEIR at 5.7-113).

F.8-155

In analyzing the impact that the proposed project could have on the nesting colonies, the DEIR states "A review of the Quail Lake and the on-site colony subset identified a potential

F.8-156

[27] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109405&inline

F.8-153A

post-Project reduction of approximately 20 percent of potentially suitable foraging habitat at each location. In a given year, if these two areas were used for nesting, the reduced availability of suitable foraging land could result in substantial reduction in nesting success." (DEIR at 5.7-149)

F.8-156 cont.

While the DEIR suggests numerous enhancement factors of tri-colored blackbird nesting habitat at several sites (at 5.7-149 to 150), there is no requirement or obligation committed to for such enhancements in the DEIR. MM 7-7 is proposed for construction of open space buffer features, including restricting permanent impacts to a minimum distance of 400 feet from the nesting area and project design features that incorporates a buffer of greater than 1,000 feet along the northern shore of Quail Lake to minimize impacts to adjacent foraging grounds and "at the east end of the Lake, east of the mouth of the aqueduct, where a small section of shoreline is close to the project impact footprint, land uses include a regional park within a low density development zone so that lands immediately beyond the required 400 foot buffer (if nesting is identified) remain permeable and retain some potential for foraging for this species." (at 5.7-150). MM 7-7 also includes the following:

> The Project shall include enhancement, restoration, and/or preservation of potentially suitable tricolored blackbird breeding and foraging habitat. Potentially suitable areas for enhancement and preservation include lower Oso Canyon in close proximity to Cement Plant Road, as well as any other created water bodies as part of the Project Drainage Plan, where feasible. Enhancement factors shall include the creation of bulrush marsh habitat or other substrate known to support breeding tricolored blackbirds; a persistent nearby standing water during the breeding season; and available adjacent foraging habitat with an appropriate food source. (DEIR at 5.7-179)

F.8-157

The MM fails to provide critical metrics – how much enhancement/restoration/creation/ preservation will be done? What is the timeline for doing so? What are the success criteria?

F.8-158

California Species of Concern

Numerous species of concern are located on the proposed project site and have potential to be significantly impacted. Species specific issues are discussed below:

a. Badger

Badgers were identified to occur throughout the project area (DEIR at 5.7-153). Literature on the highly territorial badger indicates that badger home territories range from 340 to 1,230 hectares (840 to 3,040 acres)[28]. Therefore, the proposed project could displace *several* badger territories. While surveys prior to construction are clearly essential as required by MM 7-2, even passive relocation of badgers into suitable habitat may result "take". Studies need to be provided on both on- and off-site badger territories if animals are to be passively relocated in

F.8-159

[28] Long, C.A. 1973. Taxidea taxus. Mammalian Species 26:1-4; Goodrich, J.M. and S.W. Buskirk 1998. Spacing and ecology of north American badgers (*Taxidea taxus*) in a prairie-dog (*Cynomys leucurus*) complex. Journal of Mammology 79(1): 171-179. http://cosb.us/Solargen/feir/v2/b026refs/Goodrich%20and%20Buskirk%201998%20%20Spacing%20and%20Ecology%20of%20North%20Amer.pdf

F.8-159A

order to increase chances of persistence. At a minimum, the revised or supplemental DEIR should identify suitable habitat nearby if the project is relying on passive relocation as a mitigation strategy.

F.8-159 cont.

b. Silvery legless lizard

The DEIR admits that no surveys were performed for the silvery legless lizard although one was incidentally encountered (at 5.7-110). The impact analysis of the proposed project on this species states "Of the roughly 7,000 acres impacted by the Project, it is estimated that no more than 700 acres of potentially suitable habitat occurs for both species, though is likely much less for the legless lizard. These two species are expected to be relatively abundant in the region; therefore, the loss of roughly 700 acres associated with Project implementation would be considered adverse, but less than significant for the silvery legless lizard and coast horned lizard and no mitigation is required." (at 5.7-147) Failing to identify the extent of the occupied habitat and then determining that the impacts are less than significant is baseless.

F.8-160

MM 7-2, which is proposed to minimize impacts to this species is proposed to be a single pass of a biologist doing 50-meter belt transects. Common sense suggests that the proposed protocol would assure that no silvery legless lizards would be found on the proposed project site, but it certainly would not prevent impacts to the species. MM 7-3 addresses moving silvery legless lizards out of harms way – a "feel good" strategy that has no basis in scientific literature for success. In fact, relocation of reptiles in general has a poor record of success[29] and we are unaware of any data on the success of silvery legless lizard translocations.

F.8-161

c. Migratory Birds and Sensitive Birds

Numerous migratory birds have been documented on the site. The DEIR does not quantify the number of birds (rare, migratory or otherwise) that use/traverse the project site from the avian point count surveys, nor does it evaluate the impact to birds by the elimination of almost over 10,000 acres of habitat. The revised DEIR needs to analyze likely impacts to birds from the proposed project based on the point counts. The failure to provide the baseline data from which to make any impact assessment violates CEQA. This failure to analyze impacts is not only a CEQA violation, but for migratory birds, may also lead to a violation of the Migratory Bird Treaty Act, 16 U.S.C. §§ 703 -711, because migratory birds may be "taken" if the proposed project is constructed. This project should actually include an Avian (and Bat) Protection Plan which would provide the information needed to determine key avoidance measures for birds, and provides adaptive management measures to mitigate any remaining impacts to less than significant levels. We request that at a minimum, the supplemental DEIR include such a plan.

F.8-162

Numerous sensitive birds occur on the proposed project site some of which are discussed below in more detail:

F.8-163

1. Burrowing owl

[29] Dodd, C.K. and R.A.Seigel 1991. Relocation, repatriation and translocation of amphibians and reptiles: are they conservation strategies that work? Herpetologica, 47(3): 336-350 http://www.seaturtle.org/PDF/DoddCK_1991_Herpetologica.pdf

F.8-161A

The DEIR states that "One pair of burrowing owls was observed on the site in 2001 (Impact Sciences 2004a); one individual was observed just off the site to the north during surveys in 2006 (BonTerra Consulting 2008)." (DEIR at 5.7-115.) The lack of burrowing owls on the site is surprising based on the results from the 2006-7 burrowing owl census which identified the western Mojave desert including the Antelope Valley as important and abundant burrowing owl habitat – particularly the grasslands.[30] Interestingly, the DEIR identifies MM 7-2 to benefit burrowing owl because MM 7-2 requires preconstruction surveys that follow the California Department of Fish and Wildlife's (CDFW's) 2012 burrowing owl survey protocol (DEIR at 5.7-176), however MM 7-2 (or any other MM) does not identify requirements if burrowing owls are located where development will occur. While "passive relocation" is often implemented to minimize immediate direct take of burrowing owls, ultimately the burrowing owls' available habitat is reduced, and "relocated" birds are forced to compete for resources with other resident burrowing owls and may move into less suitable habitat, ultimately resulting in "take". Additional mitigation measures needs to provided that explicitly include long-term monitoring of any burrowing owls that are moved whether through passively relocated birds or actively relocated birds, in order to evaluate their survivorship.

F.8-163 cont.

2. Northern Harrier and Loggerhead Shrike

While the DEIR acknowledges that impacts to these sensitive species that occur on site, it does not actually fully analyze what those impacts are. Instead the DEIR brushes off impacts and proposes to mitigate through acquisition of open space, which of course the birds are already using.

F.8-164

Pronghorn

Pronghorn are the namesake of the Antelope Valley. The southern-most herd in California is located on the proposed project site and is already critically imperiled.[31] A recent evaluation of the status of the pronghorn population on the proposed project site concludes the following:

> "1. Small population size: Although almost 100 individuals were originally translocated to Tejon Ranch, the population declined to a perilous size of less than 50 animals. This population appears to be critically endangered due to its current population size and its historic trend of remaining small and isolated.
> 2. Low growth rates: The herd currently has a low potential for sustained growth, with observed maximum per-capita growth rates falling far below the biologically possible value in other ranges. Recently, livestock foraging has been accelerated and standing vegetative biomass has declined to the detriment of pronghorn neonate protective cover, and abundant nutritious forage. This loss is exacerbated by the Centennial Project, for the forage on these rangelands will eventually be lost when the project is completed.

F.8-165

[30] Wilkerson, R. L. and R.B. Siegel 2011. Distribution and abundance of western burrowing owls (Athene cunicularia hypugaea) in southeastern California. The Southwestern Naturalist 56(3):378–384 http://www.elkhornsloughctp.org/uploads/files/1408734389Wilkerson%20and%20Siegel.%202011.%20Distribution%20and%20abundance%20of%20Western%20Burrowing%20Owls%20(Athene%20cunicularia%20hypugaea)%20in%20Southeastern%20California..pdf

F.8-163A

[31] Kohlmann, S. G., and J.D. Yoakum. 2009. A literature review and analysis of pronghorn populations at Tejon Ranch, California. Tierra Resource Management, San Ramon, California, USA.pgs. 89

F.8-165A

3. Climatic variability: Pronghorn at the Tejon Ranch exist under a highly variable precipitation regime. There is a robust relationship between autumn fawn ratios and the autumn precipitation 2 years prior. Predicted autumn precipitation of 3.4 inches must be achieved for positive population growth (>20 fawns / 100 does in late summer), but was not reached in 35 years out of 61 years of weather data (57%).
4. Habitat quality: The expansive perennial grasslands of a high quality are probably the reason why this population is still marginally persistent. Losing a portion of these grasslands or a persistent degradation by overgrazing could severely impact this highly vulnerable population.
5. Landscape connectivity. Pronghorn at Tejon Ranch are currently isolated from other herds. Given the small population size and stochastic vulnerability of this herd, the establishment of a metapopulation through migration corridors is of critical importance. If Tejon Ranch pronghorn can cross over the crest of the Tehachapi Mountains and Interstate 5, a viable possibility for population linkage may exist.
6. Genetics: Genetic variability is influenced by small founding population, persistently small population size, and isolation by geographic features (e.g., mountain ridges, unsuitable habitat) or human induced barriers (e.g., fences, fragmented landscapes). All these factors are prevalent at the Tejon Ranch pronghorn population. Genetic variation within the Tejon Ranch pronghorn population has not been studied, but can be considered critically in danger of having lost genetic variability."

F.8-165 cont.

The DEIR totally downplays the importance and status of the pronghorn on the proposed project site despite the fact that the proposed project will likely extirpate this population. However, the DEIR completely fails to analyze the proposed project's impacts to this iconic and charismatic animal.

F.8-166

Interestingly, in 2017, pronghorn have been documented to be re-inhabiting portions of the Antelope Valley in the region of the State's Poppy Preserve and near the Petersen mitigation bank (CDFW, personal communication). The pronghorn could have only originated from the Tejon herd, and successfully navigated across State Highway 138 and easterly across the valley. Documentation of persistence occurred in late July 2017. This persisting occurrence confirms that the Antelope Valley, through contemporary conservation improvements, can host a resident population of pronghorn. However, if the Tejon herd is impacted by the proposed project development, pronghorn will once again likely be extirpated from their namesake valley.

F.8-167

Wildlife Connectivity

The evaluation of the wildlife connectivity in the DEIR (at pg. 5.7-57) is not useful because it shows no wildlife movement on the proposed project site, and instead identifies the locations of bridges across the aqueduct. The studies in Appendix 5-7 are too general to be useful in informing the connectivity situation on the proposed project site. The discussion of connectivity follows suit and is inadequate because if fails to identify connectivity for different guilds of species. For example, connectivity for mountain lions and bears is going to be very different than for rodents or plants.

F.8-168

Based on the inadequacy of the description of the current connectivity, the DEIR fails completely to be able to evaluate the impact of the proposed project on the wildlife connectivity in the area. The revised and recirculated DEIR must thoroughly address this key issue. F.8-169

Significant Ecological Areas

Los Angeles County started identifying Significant Ecological Areas (SEAs) as a component of its General Plan in 1976. SEAs are "identified as having irreplaceable biological resources."[32] Developments within SEAs require a higher level of environmental review by the SEA Technical Advisory Committee. The County initiated a revision of the SEAs over a decade ago. The SEAs in the vicinity of the proposed project area were updated through the AVAP. In 2014, the County released the Draft Plan and EIR for the AVAP for public comment. In that Plan, the proposed project area was rezoned to include rural lands (RL1 – 1 du/net acre), residential (H-5 – 0-5 du/net acre), light industrial (IL) and open space conservation (OS-C). It also included an SEA overlay over a majority of the proposed project area (Exhibit C). The Los Angeles County Board of Supervisors adopted the Final EIR, but, among other things, they removed the SEA designation from the proposed project site, without any environmental review or analysis. The legality of this action is currently being challenged.

But the point here is that for years the proposed project site was known to meet the five of the six criteria that the County required in order to qualify as and SEA[33]: F.8-170

- On a regional basis, biotic communities, vegetative associations, and habitat of plant or animal species that are either unique or are restricted in distribution.
- Within the County, biotic communities, vegetative associations, and habitat of plant or animal species that are either unique or are restricted in distribution
- Habitat that at some point in the life cycle of a species or group of species, serves as concentrated breeding, feeding, resting, migrating grounds and is limited in availability either regionally or in the County.
- Biotic resources that are scientific interest because they are either an extreme in physical/geographical limitations, or represent unusual variation in a population or community.
- Areas that would provide for the preservation of relatively undisturbed examples of the original natural biotic communities in the County

The DEIR confirms that the proposed project area still qualifies as an SEA and should be placed into that designation. F.8-171

Regional Conservation Investment Strategy

Currently, as the County is aware, a new type of non-regulatory conservation program has been put in place in California called the Regional Conservation Investment Strategy Program.[34] The program allows for California Department of Fish and Wildlife ("CDFW") or any public agency to develop a regional conservation investment strategy ("RCIS") for the protection of focal plant and wildlife species and other important conservation elements. A F.8-172

[32] http://planning.lacounty.gov/sea F.8-170A
[33] http://planning.lacounty.gov/sea F.8-170B
[34] https://www.wildlife.ca.gov/Conservation/Planning/Regional-Conservation F.8-172A

regional approach to advance mitigation planning can ensure that compensatory mitigation actions ultimately provide conservation benefit for affected species. One of the pilot RCIS is in the Antelope Valley at the bequest of the Desert Mountains Conservation Authority.[35] Currently, the Antelope Valley RCIS process has completed an administrative draft and will be submitting it to the CDFW for review and approval. The administrative draft identifies that most of the proposed project site are a core areas (Western Antelope Valley Core and Pine Canyon Core), with large areas of the highest biological value and intactness. It also identifies the proposed project site as having the best "least cost corridor" for wildlife movement, where least cost means the animals have the easiest time moving through the area. While the administrative draft of the Antelope Valley is not a publicly available document, as a stakeholder in the process, we were given access to the administrative draft document, as was Los Angeles County. The County needs to incorporate the results of results of the RCIS process, which is wholly based on recent, best available science, into a revised and recirculated DEIR.

F.8-172 cont.

DEIR Fails to Provide Key Plans

Many of the plans that are identified in the DEIR that are necessary to adequately minimize or mitigate impacts are simply not provided in the DEIR for public review. For example:

- Special Status Plant Species Restoration Plan (at 5.7-174)
- Biological Resource Mitigation Program (at 5.7-174)
- Wildlife Relocation Plan (at 5.7-176)
- Native Perennial Grassland and Wildflower Field Mitigation Plan (at 5.7-182)
- Oak Woodland Mitigation Plan (at 5.7-185)
- Streambed and Wetland Habitat Creation and Enhancement Plan (at 5.7-188)
- Landscaping Plan (at 5.7-190), and
- Implementation Plan, including fire risk abatement measures (at 5.7-194)

F.8-173

While the CEQA lead agency has the responsibility of assuring that mitigation meets all the LORS and conditions, the Center has not always found that to be the case. Studies of mitigation compliance have borne this out as well. Making all of the required plans available as part of the public process is important to assure the public that their public trust resources are being protected – without public disclosure of these plans during the environmental review process there is no way to evaluate whether the CEQA lead, in this case the County, has put in place adequate plans to prevent degradation of our natural heritage, clean air and water. The County must supply these essential plants as part of the public process that enables public input on the various "mitigation" plans that are being proposed as conditions of this proposed project.

F.8-174

G. The DEIR Fails to Adequately Identify and Analyze Biological Resources under Climate Change.

The DEIR fails to identify or analyze the impacts of the proposed project on the biological landscape that is already responding to climate change. In fact, climate change is not mentioned in the biological section of the DEIR, and the climate change section does not discuss impacts to biological resources. The DEIR addresses risks associated with global climate change

F.8-175

[35] http://dmca.ca.gov/Attachment%204.pdf

F.8-172B

in context of including the need for climate change mitigation strategies (e.g., reducing greenhouse gas emissions) but not for the need of climate change adaptation strategies (e.g., conserving intact wild lands and the corridors that connect them). All climate change adaptation strategies underline the importance of protecting intact wild lands and associated wildlife corridors as a priority adaptation strategy measure. F.8-175 cont.

The habitat destruction and fragmentation, loss of connectivity for terrestrial wildlife, and introduction of predators and invasive species associated with the proposed project in the proposed location may run contrary to an effective climate change adaptation strategy. Siting the proposed project in the proposed location impacting the best native grasslands remaining in California and world class wildflower fields, occupied habitat and important habitat linkage areas for numerous sensitive species, and other fragile biological resources could undermine a meaningful climate change adaptation strategy with a poorly executed climate change mitigation strategy. The way to maintain healthy, vibrant ecosystems is not to fragment them and reduce their biodiversity. F.8-176

Lacking any requirement for a management plan for the conserved lands management, the DEIR makes it impossible to evaluate if the conserved lands would be managed to benefit species conservation particularly under on-going climate change. The Ranchwide Management Plan[36] focuses primarily on grazing management, not sensitive species conservation as it is, and when coupled with on-going climate change is inadequate to achieve the proposed mitigation goals for the proposed project. F.8-177

The revised and recirculated EIR needs to add a section in the Biological Resources section on climate change and address the impacts of the proposed project on biological resources under climate change scenarios. F.8-178

H. The DEIR fails to adequately mitigate the Project's impacts on wetlands.

While the Center supports habitat restoration in general, in the absence of the plan, it is impossible to evaluate or determine the efficacy of proposed minimization and mitigation to actually adequately mitigate impacts F.8-179

Disturbed lands that could be restored should first be considered for the proposed project site, because impacts to the suite of imperiled species and plant communities would be considerably less. It makes no sense to impact fully functioning habitat for unique and imperiled species when an alternative disturbed site is available. It makes even less sense and is much more expensive to impact fully functioning habitat and mitigate it by "restoring" disturbed areas. Restored habitat has never been documented to support the full functioning ecosystem processes of undisturbed habitat.[37] F.8-180

I. The DEIR cannot rely upon the Ranchwide Agreement to mitigate the Project's impacts.

[36] http://www.tejonconservancy.org/rwmp.htm F.8-177A

[37] Longcore, T., R. Mattoni, G. Pratt and C.Rich 1997 On the perils of ecological restoration:Lessons from the El Segundo blue butterfly. *2nd Interface Between Ecology and Land Development in California* J.E. Keeley, Coordinator. Occidental College, April 18-19, 1997. http://www.urbanwildlands.org/Resources/perils.pdf F.8-180A

As mentioned above, none of the terms or provisions in the Ranchwide Agreement are binding and enforceable mitigation measure under CEQA. The Ranchwide Agreement is a private agreement between the project proponent and other conservation groups that is not enforceable by the County. As such, the County cannot rely upon any of the conservation proposed in the Agreement in order to mitigate the impacts of this Project. Again, per section 3.9 of the Ranchwide Agreement, the only party that can enforce the Agreement is the Tejon Ranch Conservancy, which is partially controlled by the project proponent. F.8-181

XII. The DEIR Fails To Mitigate The Project's Land Resource Impacts.

A. The DEIR fails to analyze or address the potential for off-site land use changes associated with the project.

The DEIR claims that, "there would be no other changes in the environment… that would indirectly result in conversion of Farmland to nonagricultural use…" (DEIR at 5.5-18.) However, the DEIR offers no evidence to support this conclusion. In fact, as shown in Exhibit 5.5-1 of the DEIR, the eastern side of the project is in the vicinity of farmland of local importance (incorrectly labeled "L" in exhibit 5.5-1), as well as Prime Farmland. While the DEIR admits that the Project would result in a significant impact if it provides incentive for other agricultural landowners to convert farmland to non-agricultural use (DEIR at 5.5-18), the DEIR makes no mention of how nearby farmland might be impacted by the Project. These impacts could be considerable, given for example, that a large area of land identified as Prime Farmland would be bordered on three sides by the Project, with the potential to make farming activities and access to this location unviable. The DEIR also fails to consider the strong economic incentives for surrounding landowners to convert farmland to commercial and residential uses as a result of the Project. By claiming that the Project would not result in the indirect conversion of Farmland to nonagriculatural use without offering analysis to support this assertion, the DEIR fails to allow decision-makers and the public to make an informed decision on the extent that Project development will impact land resources. (*Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935 ("To facilitate CEQA's informational role, the EIR must contain facts and analysis, not just the agency's bare conclusions or opinions.")) F.8-182

B. The DEIR's proposed mitigation measures for impacts to land use changes are vague and inadequate.

While the DEIR acknowledges that the conversion of 642 acres of Prime Farmland to non-agricultural uses is a significant impact under CEQA, mitigation measures proposed in the DEIR are vague and are not demonstrated to mitigate these impacts. Although Project Design Feature 5-1 of the DEIR allows continued grazing on portions of the Project site and accommodates some small-scale agricultural and agricultural-related uses, it fails to directly address or mitigate the conversion of hundreds of acres of Prime Farmland to non-agricultural uses. Agricultural preservation easements would help to directly address this issue by preserving Prime Farmland. However, the use of an agricultural preservation easement is not included in any Project Design Features and is only cursorily mentioned in section 5.5-13 of the DEIR. The DEIR purports to put an agricultural preservation easement on 489 acres of Prime and Unique farmland outside of the Project site on the Tejon Ranch property, but provides no details as to the location or feasibility of this easement. The implementation of an adequate agricultural F.8-183

preservation easement, would in theory, help to mitigate the significant land-use impacts associated with the Project. As such, a thorough analysis of this proposed mitigation measure is necessary to properly evaluate the impacts of the proposed Project. (*Napa Citizens for Honest Gov't v. Napa County Bd. Of Supervisors* (2001) 91 Cal.App.4th 342, 360 ("the EIR must propose and describe mitigation measures that will minimize the significant environmental effects that the EIR has identified.")) F.8-183 cont.

C. The DEIR fails to demonstrate that impacts to farmland are unavoidable.

The DEIR claims that impacts to 642 acres of Prime Farmland cannot be mitigated "[f]or the same reasons as described in the AVAP EIR." (DEIR at 5.5-1.) The DEIR needs to provide evidence and analysis describing why these impacts to these specific 642 acres of Prime Farmland cannot be mitigated. The DEIR cannot generally cite to an EIR for a different project in order to claim impacts cannot be mitigated. F.8-184

Similarly, the DEIR generally cites to the AVAP EIR's impacts to 6,169 acres of Important Farmland in justifying the Project's conversion of 642 acres of Prime Farmland. (DEIR at 5.5-13-14.) The DEIR does not explain how impacts to a large amount of "Important" Farmland have any bearing upon the Project's impacts to 642 acres of "Prime" Farmland. Important Farmland and Prime Farmland are separate classifications. Again, the DEIR cannot claim these impacts cannot be mitigated by generally referencing "the same reasons described in the AVAP EIR…" (DIER at 5.5-14.) The DEIR offers no evidence that the AVAP EIR specifically concluded that impacts to these 642 acres of Prime Farmland are unavoidable. Accordingly, the DEIR lacks any evidence to support its conclusion that there are no feasible mitigation measures to reduce impacts to 642 acres of Prime Farmland. (*See* DEIR at 5.5-18.) F.8-185

XIII. The DEIR's Hydrological Analysis Is Flawed.

The DEIR's assertions that the Project will not result in significant hydromodification impacts rely heavily on an analysis that utilizes the Erosion Potential (Ep) methodology, which the DEIR describes as "alternate" methodology identified in the County LID Manual. (DEIR at 5.2-23.) As part of this methodology, flow conditions and volumes for peak events were analyzed for existing locations or "nodes" and compared to estimated post-development flow conditions and volumes at these same locations (as summarized in Tables 5.2-7 and 5.2-8 of the DEIR). However, the DEIR fails to offer a rationale for how and why these node locations were picked for analysis over other locations at the Project site. In fact, many of the chosen nodes appear to be strategically located downstream of proposed infiltration basin locations, which would serve to reduce flow discharge and runoff volumes during storm events. As such, the DEIR fails to accurately disclose post-development changes in flow conditions, particularly those that are upstream of chosen nodes. Post-development flow discharge and runoff volumes could significantly increase at upstream locations due to the development of impervious surfaces at the site. F.8-186

As described in the DEIR, increases in stream discharge and runoff volumes, particularly during major storm events, are likely to result in hydromodification impacts including channel erosion, modification, or sedimentation. (DEIR at 5.2-23.) Since the Project would result in a significant impact if it would "alter the course of a stream or river" (LA County Environmental F.8-187

Threshold 2-1, 2-2), an analysis of hydromodification impacts under CEQA should evaluate these potential impacts across all locations at the Project site. Moreover, the DEIR fails to evaluate potential hydrologic or hydromodification impacts for streams located in the northernmost portions of the Project. The DEIR justifies the decision to exclude these streams from analysis by stating that, "East Tributaries 7, 8, and 9… do not have defined channels in either the existing or proposed condition" (DEIR at 5.2-24). However, it remains to be seen how these tributaries might be consistently mapped and delineated in DEIR figures without the existence of defined channels.

F.8-187 cont.

XIV. The DEIR Fails To Adequately Analyze And Mitigate The Air Quality Impacts Of The Project.

Air quality is a significant environmental and public health concern as unhealthy, polluted air contributes to, and exacerbates, many diseases and mortality rates. In the U.S., government estimates indicate that between 10-12 percent of total health costs can be attributed to air pollution. (VCAQR 2003) Many plants and trees, including agricultural crops, are injured by air pollutants. This damage ranges from decreases in productivity, a weakened ability to survive drought and pests to direct mortality. (VCAQR) Wildlife is also impacted by air pollution as the plants and trees that comprise their habitats are weakened or killed. Aquatic species and habitats are impacted by air pollution through the formation of acid rain that raises the pH level in oceans, rivers and lakes. (EPA 2016) Greenhouse gases, such as the air pollutant carbon dioxide which is released by fossil fuel combustion, contribute directly to human-induced climate change. (EPA 2016) In this feedback loop, poor air quality that contributed to climate change will in turn worsen the impacts of climate change and attendant air pollution problems. (BAAQMD 2016)

F.8-188

Some of the nation's most polluted counties are in Southern California with LA County continually topping the list. (ALA 2016) Air pollution and its impacts are felt most heavily by young children, the elderly, pregnant women and people with existing heart and lung disease. People living in poverty are also more susceptible to air pollution as they are less able to relocate to less polluted areas, and their homes and places of work are more likely to be located near sources of pollution, such as freeways or ports, as there areas are more affordable. (BAAQMD 2016; ALA 2016) Pollution sources include transportation, industry and manufacturing, construction, the importation and movement of goods, and energy development. Transportation presents one of the most significant sources of pollution in urban areas, where large segments of the population are constantly exposed to roads and traffic. (BAAQMD 2016; Newman)

F.8-189

Although there are many different types of air pollution, Ozone, Fine Particulate Matter and Toxic Air Contaminants are of greatest concern in urban areas, particularly Southern California. These three air pollutants have been linked to an increased incidence and risk of cancer, birth defects, low birth weights and premature death, in addition to a variety of cardiac and lung diseases such as asthma, COPD, stroke and heart attack. (Laurent 2016; ALA 2016) Ozone, also commonly referred to as smog, is created by the atmospheric mixing of gases resulting fossil fuel combustion and other volatile organic compounds and sunlight. Although it is invisible, ozone poses one of the greatest health risks, prompting the EPA to strengthen its National Ambient Air Quality Standard for Ozone in 2015. (ALA 2016) Fine Particulate Matter is generally found in urban areas as a result of vehicle exhaust emissions, and these microscopic

F.8-190

particles are what contribute to visible air pollution. These tiny participles are dangerous because they are small enough to escape out body's natural defenses and enter the blood stream. Fugitive dust is a term used for fine particulate matter that results from disturbance by human activity such as construction and road-building operations. (VCAQR 2003) Fine Particulate Matter can also result from ash caused by forest fires, which will continue to impact that living in the urban-wildland interface and increasingly beyond as climate change exacerbates the risk of forest fires. (BAAQMD 2016) Toxic Air Contaminants are released from vehicle fuels, especially diesel, which accounts for over 50% of the cancer risk from TACs. (BAAQMB 2016) This is especially relevant for Southern California with its abundance of diesel shipping traffic. (Bailey; Betancourt 2012)

F.8-190 cont.

Urban infill is an effective plan for reducing the air pollution and greenhouse gas emission resulting from heavy reliance on vehicles. Centrally locating housing, shopping and places of employment reduces vehicle miles travelled and new road construction. With fewer roads and less traffic, it will be less likely that housing will be located near busy, polluting roads, which is a large source of exposure. (BAAQMD 2016) Infill planning also allows for realistic promotion of alternative transportation such as walking or biking. Public transportation options should be converted or retrofitted to clean fleets. A life-cycle assessment of the entire project should be conducted to inspect the totality of the resultant air pollution, from manufacturing of the materials to their transport to the site, and beyond. (BAAQMD 2016; Ghattas 2013)

F.8-191

The Project would affect several areas that are in violation of the Clean Air Act's National Ambient Air Quality Standards ("NAAQS"). The South Coast air basin is in extreme nonattainment for the 2008 8-hour ozone standard, moderate nonattainment for the 2012 PM 2.5 standard, serious nonattainment for the 2006 PM 2.5 standard, and moderate nonattainment for the 1997 PM 2.5 standard.[38] The San Joaquin Valley air basin is in extreme nonattainment for 2008 8-hour ozone standard, moderate nonattainment for 2012 PM 2.5 standard, and serious nonattainment for the 2006 PM 2.5 standard, and 1997 PM 2.5 standard.[39] The Mojave Desert Air Basin is in severe 15 nonattainment for the 2008 8-hour ozone standard, and moderate nonattainment for the 1997 PM 10 standard.[40] State and local air agencies determined that attainment required massive emission reductions from all pollution sources, even in the absence of any growth in emissions associated with new projects, if these areas are to attain the standards. The EIR fails to adequately address the project's significant increase in emissions in the San Joaquin, South Coast, and Mojave Desert air basins and adequately analyze to what extent the ambitious reductions required under the State Implementation Plans will be hindered by the project.

F.8-192

The EIR fails to adequately analyze the project's impacts because of the difficulty of determining, in the absence of adequate modeling, whether the project, and other potential projects interfere with attainment of NAAQS. From an air quality perspective, a new project of the magnitude of the Centennial project, coupled with other potential projects (e.g. Grapevine,

F.8-193

[38] U.S. EPA, Nonattainment Areas for Criteria Pollutants (Green Book), available at https://www.epa.gov/green-book

F.8-192A

[39] U.S. EPA, Nonattainment Areas for Criteria Pollutants (Green Book), available at https://www.epa.gov/green-book

F.8-192B

[40] U.S. EPA, Nonattainment Areas for Criteria Pollutants (Green Book), available at https://www.epa.gov/green-book

F.8-192C

Newhall Ranch, Tejon Mountain Village), has the potential to interfere with the air plans' tasks of reducing ambient pollutant concentrations to levels no greater than federal air standards for PM and ozone.

F.8-193 cont.

The EIR must assure that the Project would not conflict with AVAQMD, SCAQMD, MDAQMD, and SJVAPCD air quality management plans ("AQMP"), the Southern California Association of Governments ("SCAG") 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS"), and the SCAG 2016–2040 RTP/SCS. The EIR must assure that the combined population growth projections and development that are cumulatively expected as part of the range of approved projects conform to the assumptions in the AQMPs and RTP/SCS. A leapfrog project of this scale, combined with other massive new development projects such as Grapevine, Newhall Ranch, Tejon Mountain Village, threatens to exceed the projections, assumptions, and mitigations incorporated into those plans. The EIR must provide substantial evidence that the cumulative development in the South Coast, Antelope Valley, Mojave Desert, and San Joaquin Valley Air Basins, combined with this project, will not exceed the projections underlying those plans. Conclusory statements that the projects do not conflict with those standards does not provide the public or decisionmakers with the information necessary to make an informed decision on the environmental impacts, mitigation measures, or alternatives related to the Project.

F.8-194

The EIR must also assure that the analysis is not segmented to avoid analyzing the Project's whole impacts on affected air quality thresholds or air quality management plans. The EIR must not minimize the whole of the Project's impacts or emissions by only applying a portion of the emissions from the Project in different areas because those emissions cannot be controlled within the air district. The total emissions from the Project must be analyzed against the thresholds and air quality management plans for the South Coast air basin and Antelope Valley air basin. The EIR must also prepare proper modeling to analyze the potential for drift and project emissions from mobile sources as they would be affecting the Mojave Desert and San Joaquin Valley Air Basin.

F.8-195

The EIR must adequately analyze the potential health risks from the Project's air pollution. The Guidelines require EIRs to discuss health problems caused by proposed projects. (Guidelines § 15126.2.) The EIR must assure that this is a robust health assessment for all criteria pollutants, Mobile Source Air Toxics, such as acrolein, benzene, 1,3-butadiene, diesel particulate matter, formaldehyde, naphthalene, and polycyclic organic matter, and Toxic Air Contaminants. Simply providing emissions levels or general descriptions of health impacts provides no context to decisionmakers or the public of the Project's actual effects on public health. An EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 653.) Numbers or general descriptions without translation for the public or application to the project do not meaningfully inform the public. Because the project will be built over many years and decades the EIR must analyze the potential for project construction at later phases to affect the residents of the development that will already be living and working there. A sensitive receptor baseline that does not account for the future residents of the Project area overlooks the whole of the project and employs a flawed baseline to minimize impacts to public health and the affected environment.

F.8-196

A. The DEIR underestimates the air quality impacts of the Project.

The DEIR estimates that approximately 23,675 employment opportunities will be created in relation to the Project, and that the resident population will be approximately 57,150 persons. According to the latest US census figures, the average percent of the U.S. population in the civilian workforce is 63.3 percent, meaning that a reasonable estimate for the employed population of the proposed Project is 36,176 persons. Given the specific skills and experience needed for many of the jobs that are proposed to be generated by the Project, such as those in research and development, it is highly unlikely that the entirety of generated employment opportunities would be filled by persons residing in the community. However, even assuming this unlikely scenario, the Project would still result in an estimated 12,501 persons commuting externally for employment. As such, the Project traffic study (Appendix 5.10-A) predicts that the majority of daily trip generation will be external to the Project site. Given that the Project is located more than 40 miles from major centers of population and employment, the impacts of these external trips on air quality (in addition to noise and carbon emissions) would be significant. However, the DEIR fails to adequately to analyze these impacts or to propose meaningful mitigation measures. F.8-197

Regarding air quality, the DEIR admits that "the primary source of long-term emissions would be from vehicle operations" (DEIR at 5.11-1), and that as a result long-term operational emissions of VOC, NOx, CO, PM10, and PM2.5 would exceed AVAQMD and SCAQMD CEQA significance thresholds. While the DEIR cites MM 11-4, 11-5, and 11-6 in response to air quality impacts, these mitigation measures are inadequate and fail to address air quality problems related to external automobile trips. F.8-198

The Project impacts areas where attainment planning for air quality standards is most challenging and understates the magnitude of the problem and impacts. Both ozone and Particulate Matter ("PM") 2.5 and their gaseous precursors are by their nature capable of being transported by prevailing winds within air basins and between adjoining air basins. Because of its location, emissions from the Project affect not only the South Coast air basin and Antelope Valley air basin but also the adjacent San Joaquin Valley air basin and the Mojave Desert air basin. The DEIR must fully analyze the Project's potential impacts and vehicle trips on adjacent areas and air basins, not only through the transport of those emissions via wind, but also through the emissions resulting from the vehicles themselves as they enter those air basins. It is not simply enough to assert that the Project will only affect air basins where it is physically located when vehicle trips and weather patterns with take emissions into adjacent air basins such as the San Joaquin Air Basin or Mojave Air Basin. The DEIR must also analyze the Project's potential to exceed significance thresholds for other air basins such as the thresholds set up by the San Joaquin Valley Air Pollution Control District and Mojave Desert Air Quality Management District. F.8-199

The Project impacts three of the most heavily polluted areas in the country. Los Angeles County in the South Coast air basin and Antelope Valley air basin, Kern County in the San Joaquin Valley air basin and San Bernardino County in the Mojave Desert Air Basin rank among the nation's worst in overall ozone and PM 2.5 pollution. (American Lung Association 2016.) The Project cannot avoid the Project's air quality impacts by avoiding the potential emissions from vehicle trips associated with the Project by improperly narrowing the geographic breadth of F.8-200

the analysis or avoiding the trips that would occur beyond the immediate area. The DEIR underestimates trip length by overestimating the capture rate for traffic and cannot be supported by substantial evidence because it ignores the jobs/housing imbalance in the Project area and how the inability of the immediate vicinity to provide jobs for the over 57,150 new residents. (DEIR 1-23.) A comprehensive analysis of air quality impacts is acutely important where, as here, the Project is in an area already experiencing adverse air quality. (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692, 723-724.) The DEIR fails to project an accurate trip length in generating air quality emissions, including greenhouse gases and criteria pollutants, considering the leapfrog nature of this project that is located far from existing job and commercial centers. This inconsistent and incomplete data fails to provide the public and decision-makers with the necessary information required under CEQA. This grave threat to both wildlife and natural resources must be fully analyzed and accounted for in the EIR. Successfully addressing the area's unique pollution problems is made more difficult by projected growth in population and activity levels, increasing the amount of pollution generated within the area, the geographic extent of the polluted area, and the size of the population exposed to these extraordinarily high pollution levels.

F.8-200 cont.

B. The DEIR's proposed mitigation measures are inadequate.

MM 11-4 states that "facilities shall be installed to support future electric vehicle charging at each non-residential building with 30 or more parking spaces." (DEIR at 5.11-80.) MM 11-4 then specifies different guidelines for "when a single charging space is required" opposed to "when multiple charging spaces are required." However, the DEIR fails to specify under what situation multiple charging spaces might be required, leaving the possibility that in large parking lots, only one charging station might be available for hundreds of cars. MM 11-6 suffers from the same vague language regarding charging space requirements, but exacerbates the problem by applying only to parking structures and lots with 20 or more parking spaces. CEQA requires that mitigation measures "must be fully enforceable through permit conditions, agreements, or other legally-binding instruments." (CEQA Guidelines § 15126.4(a)(2).) The vague mitigation measures fail to meet CEQA's requirements. The DEIR makes no mention of making electric charging stations accessible to residential buildings, which given the substantial investment associated with installing electric vehicle service equipment at a personal residence, would present a significant obstacle to the adoption and use of electric vehicles at the project site. Thus, the DEIR does almost nothing to facilitate the use of electric vehicles, which would otherwise help to mitigate the substantial air quality impacts and GHG emissions associated with the Project.

F.8-201

MM 11-5 describes proposed requirements to make bicycle parking accessible within the community, which is consistent with proposed measures that promote bicycle use in other sections of the DEIR. While the use of transportation by bicycle should be encouraged, high temperatures in the area – including maximums that meet or exceed 100 °F – would provide an obstacle to the widespread adoption of bicycle transportation within the community. Furthermore, given the considerable distance between the Project and major population centers, bicycle transport would not address concerns related to trips external to the Project site.

F.8-202

The EIR fails to disclose and analyze many feasible mitigation measures that would reduce the significant impacts of the project. CEQA requires that an EIR propose "feasible"

F.8-203

mitigation measures "to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy." (Pub. Res. Code §§ 21000(b)(3), 21002.1(b); CEQA Guidelines § 15126.4(a)(1); *Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors*, 91 Cal. App. 4th 342, 360 (2001).) "Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified." (CEQA Guidelines § 15126.4(a)(1)(B).) Therefore, it is the "policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures which will avoid or substantially lessen the significant environmental effects of such projects." (Pub. Res. CODE § 21002.)

F.8-203 cont.

Fortunately, many mitigation measures to be considered and adopted are described in detail in the documents attached: (1) San Joaquin Valley Air Pollution Control District: Mitigation Measures, (2) Bay Area Air Quality Management District, *California Environmental Quality Act: Air Quality Guidelines* (2011), (3) Sacramento Metropolitan Air Quality Management District, Recommended Guidance for Land Use Emission Reductions Version 3.3 (for Operational Emissions) (2016), (4) San Luis Obispo County Air Pollution Control District, CEQA Air Quality Handbook: A Guide for Assessing the Air Quality Impacts For Projects Subject to CEQA Review (2012), (5) California Air Pollution Control Officers Association (CAPCOA), *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act* (2008), and (6) California Attorney General's Office, *Addressing Climate Change at the Project Level* (2010). The documents identify existing and potential mitigation measures that could be applied to projects during the CEQA process to reduce a project's air pollution and GHG emissions. These mitigation measures also provide the co-benefit of reducing many criteria emissions that contribute to the significant impacts to air quality from this project and should be evaluated for their feasibility in reducing both greenhouse gases and criteria pollutants.

F.8-204

Because CEQA requires the adoption of all feasible mitigation measures to reduce significant impacts, the Project must adopt all feasible mitigation measures to reduce air quality and GHG impacts or provide "substantial evidence" as to why the mitigation measures are infeasible. (Guidelines § 15091(b).) Even if the Project's impacts are *unavoidable* that does not absolve the County of its obligation to *mitigate* significant impacts to the extent feasible. The Center therefore suggests the EIR adopt all feasible mitigation measures set forth in the attached. Their feasibility is proven, in many cases, by their actual implementation by cities and counties across California.

F.8-205

XV. The DEIR Fails To Adequately Disclose And Analyze The Seismic Risk Of The Project.

The DEIR erroneously claims that "the overall seismic risk at the Project site is the same as Southern California in its entirety" (DEIR at 5.1-15). In fact, due to its location at the junction of the San Andreas and Garlock fault systems, the Project is located in an area that is categorized as having the highest level of earthquake hazard in the state, according to probabilistic seismic hazard maps prepared by the United States Geological Survey and California Geological Survey. (USGS 2003.) While the DEIR claims that "the Project would not expose people or structures to potential adverse effects (including the risk of injury or death) from surface rupture of a known

F.8-206

earthquake fault …" (DEIR at 5.1-1.), this assertion hinges largely upon the implementation of Project Design Feature (PDF) 1-1, which institutes a 100-foot setback from fault lines located in the area of development. However, the DEIR provides no evidence to support the claim that a 100-foot setback, which could be reduced to 50-feet with County approval, would be sufficient to mitigate the seismic risk associated with a project located adjacent to one of the most hazardous fault zones in the country. Since the Project would result in a significant impact if it would expose people or structures to potential substantial adverse effects from strong seismic groundshaking, according to County threshold criteria, such an analysis is necessary to properly evaluate the seismic risk associated with the Project.

F.8-206 cont.

In addition to the failure to evaluate whether proposed mitigation measures would be effective in reducing seismic risk to non-significant levels, the existing analysis of seismic risk at the Project site is flawed. The DEIR evaluates seismic hazard for the center of the Project site, rather than for the areas of the Project that would be most affected by a seismic event. While portions of the Project are located immediately adjacent to the San Andreas fault zone, Table 5.1-1 of the DEIR estimates peak ground acceleration (PGA), a measure of ground motion that is indicative of potential damage to buildings and infrastructure, for a distance of 0.7 miles from the San Andreas fault. Since peak ground acceleration and other measures of ground motion are generally observed to attenuate exponentially with distance from fault rupture, this approach may significantly underestimate ground motion at the most-affected areas of the Project site. Since the DEIR proposes locating structures as close as 100-feet from major faults, a proper evaluation of seismic risk should analyze the seismic hazard for these near-fault areas of the Project site, particularly considering the considerable maximum earthquake magnitude (8.2) and ground acceleration potential for the Project site. In fact, the DEIR acknowledges that "in the event of a major seismic event, no structure is completely safe from damage." (DEIR at 5.1-15.)

F.8-207

Other than proposed Project Design Feature 1-1, which has not been demonstrated to effectively mitigate concerns regarding seismic risk, the DEIR attempts to allay seismic hazard concerns by agreeing to conform with applicable building codes and to incorporate geotechnical recommendations presented in existing and future geotechnical reports. However, a promise to comply with existing laws is not sufficient to demonstrate that impacts are less than significant. (*See Californians for Alternative to Toxics v. Dept. of Food & Agric.* (2005) 136 Cal.App.4th 1, 17.) Additionally, a dependence on recommendations from future geotechnical reports inappropriately defers necessary analysis at the Project level to the various phases. (*Stanislaus Natural Heritage Project, Sierra Club v. County of Stanislaus* (1996) 48 Cal.App.4th 182, 204-206 (analysis of significant effects may not be deferred to later developments under the specific plan, nor to later tiered EIRs.))

F.8-208

The DEIR also defers proper consideration of sensitive land uses including schools, hospitals, and public assembly sites, in relation to the seismic hazard associated with the Project site. For example, the DEIR states that "the California Department of Education's (CDE's) Title 5 requirements would be implemented by local school districts and would ensure that school site location decisions and building designs meet all applicable seismic and public safety concerns…" (DEIR at 5.1-16.) Applicable CDE requirements state that school siting should place a "emphasis upon an engineering investigation made of the site to preclude locating the school on terrain that may be potentially hazardous….including whether the site is situated on or near a pressure ridge, geological fault or fault trace that may rupture" (CDE, Title 5, § 14011.

F.8-209

Procedures for Site Acquisition State-Funded School Districts). Given that the Project site is located in an area of high seismic hazard and that the inclusion of schools, hospitals, and public assembly sites is essential to the viability of the Project as a whole, the DEIR should properly evaluate whether the Project can accommodate sensitive land uses in accordance with existing regulations regarding seismic risk.

F.8-209 cont.

A. The DEIR fails to evaluate risk associated with earthquake-triggered landslides, despite evidence indicating significant risk from coseismic landsliding at the Project Site.

While the Project is located in an area of high seismic hazard, and while the topography and geology of the area make the Project site highly susceptible to landsliding, the DEIR fails to evaluate or mitigate risks associated with earthquake-triggered landsliding. Dipping sedimentary units such as those found throughout the Project site, are at considerable risk of failure along existing planes of weakness, particularly during seismic events, as attested to by the observation of bedding plane shears in exploratory borings conducted at the Project site. (DEIR at 5.1-9.) The DEIR also notes that shallow landslides and slumps were observed during on-site geotechnical investigations. (DEIR at 5.1-5.19.) Of particular concern is the large landslide identified in the northwest corner of the Project site, which has an area of approximately one square mile and contains debris that are as much as 200 feet thick. (Appendix 5.1-A.) While the DEIR describes that land uses are configured to avoid placing structures in this vicinity, the existence of this landslide indicates that the Project area is susceptible to similar large landsliding events.

F.8-210

Landslide risk would be anticipated to be particularly high in the steeper topography located in the western portion of the Project site, although steeply sloping arroyos found throughout the Project site would also pose a risk of landsliding. Seismic events are highly likely to trigger landsliding via ground shaking. The 1994 (Mw) 6.7 Northridge earthquake triggered more than 11,000 landslides, 57 deaths, and billions of dollars of economic damage in the Los Angeles area (Harp and Jibson, 1995). According to Table 5.1-1 of the DEIR, the Project site is located within 25 miles of 8 dominant faults that could produce an earthquake magnitude greater than that of the Northridge event. Since the Project would result in a significant impact if it would "expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides" (County of Los Angeles Environmental Checklist, Threshold 1-4), an evaluation of the risk posed by earthquake-triggered landsliding is necessary.

F.8-211

XVI. The DEIR Fails To Adequately Analyze And Mitigate The Project's Impacts On Water Supplies.

The DEIR's analysis of the Project's water supply fails to adequately consider all potential significant impacts. The DEIR fails to include adequate mandatory or enforceable water mitigation strategies.

F.8-212

A. The DEIR Fails to Provide Assurance that the Project Has a Long-Term Water Supply

The DEIR relies on the water shortage analysis from the driest three-year historic sequence of 1931-1933, which should be updated to reflect the new droughts from 2011 onward,

F.8-213

as this submission is dated 2009 (DEIR Appendix 5.18A p. 22). The modeling for future water delivery reliability was done from 1922-2003. (Centennial Water Supply Assessment 3-11). However,§ 10632(a)(2) requires this estimate to be based off the driest three-year historic sequence for the agency's water supply. The DEIR should include the new drought information for two key reasons: the first being that climate change is going to continue to exacerbate weather abnormalities, making the 1931 drought too conservative an estimate, and the second being that the purpose of the legislation is having suppliers "carr[y] out their long–term resource planning responsibilities," which should mean including up-to-date drought data (Cal Wat Code § 10610.2(b)).

F.8-213 cont.

In addition, the water shortage response plan has been "designed based on the assumption that during a long-term drought the California Department of Water Resources will have a reduction in water deliveries, which is unlikely considering only government-mandated water conservation measures reduce demand, and then only for a temporary period of time." (DEIR at 28; *see also* Emily Guerin, 'Water use in California is increasing. Should we care' *KPCC.org,* Sept. 07 2016)... Further, "[r]educed water supplies coupled with increases in demand are likely to exacerbate competition for over-allocated water resources" (IPCC 2007 Working Group II: Impacts, Adaptation and Vulnerability 14.2.1)

F.8-214

Finally, the DEIR misguidedly relies on a water bank balance greater than zero. Water sustainability should be done based on a starting point of 0 AF; using the number of 6700 AF (minus 10%) as the beginning availability inflates the water availability analysis in the long-term and does not account for unforeseen water bank losses: for instance, earthquakes altering the water bank loss factor; reduced groundwater percolation recharge; water loss due to pollution. By not projecting sustainability analyses from 0 AF, the DEIR has an inflated margin of water availability that is entirely speculative.

F.8-215

For instance, the DEIR states that the water bank balance equal to the previous year's balance plus net transfers to or from the water bank minus 10% general loss. (DEIR 5.18 at 5-1). Phase 1 projections presumably demonstrate that groundwater is not needed to meet this demand, and therefore it is not included in the net amount of surplus water transferred. (*Id.*) This all assumes water is a static entity which can be reasonably relied on. Further, these projections are based on the 1931-33 drought, not the most recent drought, which has presumably altered the net amount of banked water, as well as the surface water upon which Phase 1 relies.

F.8-216

The DEIR supposes that it will bank water in wetter years when the actual deliveries are greater, and extracting stored water for use in drier years, to average a total of 2,607 AF available *if it is properly managed.* (Id). The dry years, which would pull upon the reserves, "are assumed to follow years of long-term average water availability." (*Id.*)This assumption is untenable in the face of climate change, where prolonged droughts of escalating irregularity are projected to occur. (IPCC, *supra*). Finally, the DEIR assumes that responsible ('proper') management will ensure availability of the water bank. Management of water banks is infamously poor, and because of limited regulatory oversight, easily 'improperly' managed.

F.8-217

Thus the margin of error in these calculations is only 2,600 AF, or the equivalent of the use for 5200 residences (using the standard 0.5AF/household/year). Centennial is planning on allowing 19,333 dwelling units. This margin, then, accounts for water use of roughly 25% of the

F.8-218

entire project development. (Centennial DEIR, 1-4). By not starting at zero banked water, the DEIR is gambling with a significant amount of water.

F.8-218 cont.

Finally, Centennial states that the Antelope Valley groundwater basin is subject to an ongoing adjudication. (DEIR Appendix 5.18 at 4.-2). Because of the uncertainty surrounding the water rights, assumptions built upon access to the water must be revised in light of the decision.

F.8-219

B. The DEIR fails to include mandatory or enforceable water mitigation strategies.

The DEIR relies on a backstop of increased conservation to mitigate uncertainty rather than planning for it:

> In the event that future water demands are determined to exceed available supplies, the Project Water Purveyor must implement measures to ensure that supplies will be adequate to meet future demand, including such measures as enhanced water budget based rates consistent with applicable legal requirements, increased enforcement, faculty repairs or upgrades, or obtaining supplemental water supplies. No additional development will occur until water use report response measures have been implemented [...].(DEIR at 5.18-2).

If these provisions are to curb excessive water demands, they must be 'mandatory' measures. Currently DEIR Appendix 5.18 only requires that "customers are in the best position to implement no-waste policies" and urban water suppliers "may use any time of consumption reduction methods…that would reduce water use." (DEIR Appendix 5.18A, at 26). These statements do not demonstrate actual mitigation strategies that can be implemented, nor their enforceability, in times of overconsumption of water. Section 10632(a)(4) of the Water Code states: "Additional, mandatory prohibitions against specific water use practices during water shortages, including, but not limited to, prohibiting the use of potable water for street cleaning." As the DEIR is written, no mandatory prohibitions besides potable water for street cleaning is specifically mentioned. This provision would be meaningless if applicants could do what Centennial has done, which is deferring listing specific practices to the water suppliers.

F.8-220

C. The DEIR Fails to Analyze the Environmental Impacts of the Project's Use of the Nickel Water & Its Reliability

The DEIR fails to discuss any potential environmental impacts of the Project's use of the Nickel water. The Nickel water reliance is a significant source of its base water supply projection, with 51% of the water for years 1-10 coming from it. (Centennial Water Supply Assessment at 5-3). All aspects of the arrangement, from the withdrawal of the water from the Kern River (or from the Delta, the ground, or wherever else) to the transfer of the water to the Project to the use of the water at the Project site, must be disclosed and analyzed. Any prior environmental reviews regarding Nickel water, including all supporting documentation, must be disclosed and analyzed in the DEIR (and included in full). Other information that should be included and analyzed in the EIR is all information regarding prior use of Nickel water, including before and after any prior environmental review. The DEIR's analysis, by placing the transfer in a vacuum, fails to consider all potential significant environmental impacts of this Project. It may be that the Project's water supply, being a return on loaned water at an interest

F.8-221

rate is truly reliable, though located in one of the most drought-prone parts of drought-prone California. But this needs to be explained and supported by facts fully disclosed in the DEIR. The DEIR cannot rely solely on the Water Transfer Contract to conclude that the Project's water supply is completely reliable.

F.8-221 cont.

D. The EIR must analyze climate change's effect on water supply in determining water supply impacts.

Significantly for the state, as well as the Project area, is climate change's impact on water supply. The Intergovernmental Panel on Climate Change (IPCC) specifically identified the American West as vulnerable, warning, "Projected warming in the western mountains by the mid-21st century is very likely to cause large decreases in snowpack, earlier snow melt, more winter rain events, increased peak winter flows and flooding, and reduced summer flows . . . ." (IPCC 2007b.) Recently, researchers found that an increase in atmospheric greenhouse gases has contributed to a "coming crisis in water supply for the western United States. . . ." (Barnett 2008.) Using several climate models and comparing the results, the researchers found that "warmer temperatures accompany" decreases in snow pack and precipitation and the timing of runoff, impacting river flow and water levels. (Barnett 2008.) These researchers concluded with high confidence that up to 60 percent of the "climate related trends of river flow, winter air temperature and snow pack between 1950-1999" are human induced. (Barnett 2008.) This, the researchers wrote, is "not good news for those living in the western United States." (Barnett 2008.)

F.8-222

The California Center on Climate Change has also recognized the problem climate change presents to the state's water supply and predicts that if GHG emissions continue under the business-as-usual scenario, snowpack could decline up to 70-90 percent, affecting winter recreation, water supply and natural ecosystems. (Cayan 2007.) Climate change will affect snowpack and precipitation levels, and California will face significant impacts, as its ecosystems depend upon relatively constant precipitation levels and water resources are already under strain. (Cayan 2007.) The decrease in snowpack in the Sierra Nevada will lead to a decrease in California's already "over-stretched" water supplies. (Cayan 2007.) It could also potentially reduce hydropower and lead to the loss of winter recreation. (Cayan 2007.) All of this means "major changes" in water management and allocation will have to be made. (Cayan 2007.) Thus, climate change may directly affect the ability to supply clean, affordable water to the residents, or change how the Project will utilize water, and it may also impact other activities outside the Project area, such as agriculture.

F.8-223

Scientists indicate that climate change will also exacerbate the problem of flooding by increasing the frequency and magnitude of large storms, which in turn will cause an increase in the size and frequency of flood events. (NRDC 2007.) The increasing cost of flood damages and potential loss of life will put more pressure on water managers to provide greater flood protection. (NRDC 2007.) At the same time, changing climate conditions (decreased snowpack, earlier runoff, larger peak events, etc.) will make predicting and maximizing water supply more difficult. (NRDC 2007.) These changes in hazard risk and water supply availability must be considered during environmental review.

F.8-224

Water quality, in addition to water quantity and timing, will also be impacted. Changes in precipitation, flow, and temperature associated with climate change will likely exacerbate water quality problems. (NRDC 2007.) Changes in precipitation affect water quantity, flow rates, and flow timing. (Gleick 2000.) Shifting weather patterns are also jeopardizing water quality and quantity in many countries, where groundwater systems are overdrawn. (Epstein 2005.) Decreased flows can exacerbate the effect of temperature increases, raise the concentration of pollutants, increase residence time of pollutants, and heighten salinity levels in arid regions. (Schindler 1997.) F.8-225

Accordingly, the DEIR must contain a realistic assessment regarding climate change's effects on the Project's planned water supplies. F.8-226

XVII. The DEIR Fails Establish Consistency with Applicable Plans and Policies.

Land use decisions must be consistent with all applicable land use policies, including the Los Angeles County General Plan ("General Plan") and all of its elements. (See *Pfeiffer v. City of Sunnyvale City Council* (2011) 200 Cal. App. 4th 1552, 1562-1563.) Unfortunately, the DEIR fails to establish inconsistently with the General Plan, AVAP policies, and other policies as set forth below. F.8-227

The DEIR claims the Project complies with the 2016-2040 RTP/SCS. However, the DEIR admits the "resident population of the Project at buildout is 82.46 percent of the projected resident population of traffic analysis zone (TAZ) 20280000 and TAZ 20281000 by 2035, ***but exceeds the Southern California Association of Governments (SCAG) projections for 2040***." (DEIR at 5.8-2.) While the DEIR dismisses this inconsistency by claiming the projects are "non-binding," the Project is nonetheless inconsistent with SCAG projections. As such, the DEIR is misleading when it repeatedly claims that the Project and the growth caused by the Project is expected, planned, or anticipated. More importantly, the inconsistency with SCAG projections renders the Project inconsistent with the Sustainable Communities Strategy, as required by SB 375. F.8-228

The DEIR further acknowledges that while the AVAP EIR is subject to litigation brought by the Center, the DEIR "does not tier from, nor is it legally reliant upon, the EIRs for either the AVAP…" (DEIR at 5.8-3.) This statement is undermined by the hundreds of references to the AVAP or AVAP EIR throughout the DEIR. Indeed, as discussed above, the DEIR repeatedly generally cites to analyses in the AVAP EIR. (*See* DEIR at 1-11, 5.5-1, 5.5-14.) F.8-229

A. The Project is inconsistent with the General Plan.

The DEIR concludes it is consistent with the LA County General Plan's policy of promoting a balanced distribution of jobs and services. (DEIR at 5.8-20.) Yet, this conclusion is belied by the fact that average trip lengths will be 45.9 miles. In addition, as discussed above, the developer(s) or builder(s) could avoid any of the commercial or school development if they believe such an approach is warranted based upon "market conditions." F.8-230

The LA County General Plan on page 92 explains that "Jobs-housing balance is reached by working toward increasing opportunities for people to work and live in close proximity, and F.8-231

reduce long commutes that are costly both economically and environmentally."[41] This Project will do the opposite of achieving "balance" by siting thousands of people many dozens of miles from employment opportunities. Similarly, the General Plan states on page 74:

> Suburban sprawl is a land use pattern that extends urban infrastructure and residential development into undeveloped areas with limited or no infrastructure, such as roads, public utilities, and public transit.

F.8-231 cont.

The Project typifies this land use pattern because there is currently no development anywhere near the Project site and extremely limited infrastructure. As the General Plan further explains, sprawl results in the fragmentation of open space areas, loss of agricultural lands, and contributes to "traffic congestion, air pollution, and greenhouse gas emissions." The Project will disproportionately add to all of these harms. As such, the Project is inconsistent with LU 3, which provides that development patterns should discourage sprawl.

F.8-232

B. The Project is inconsistent with the AVAP's Land Use Element.

The DEIR claims that the Project is consistent with the AVAP's Goal LU 2, which requires land use patterns that protect environmental resources. The DEIR claims this goal will be met by compliance with SEAs and the Ranchwide Agreement. (DEIR at 5.8-24.) However, the SEAs were reduced with no corresponding environmental review, as explained in the Center's litigation regarding the AVAP EIR. In addition, as discussed in the Biological Resources section, the County previously had considered the Project area as a SEA, but removed the designation. Moreover, as discussed above, the County cannot rely upon the private Ranchwide Agreement to fulfill its obligations under CEQA, the AVAP, or the General Plan. The DEIR is inconsistent with Policy LU 2 for similar reasons.

F.8-233

The Project is inconsistent with Goal LU 3, Policies LU 3.1 and 3.5 for the reasons discussed in section XV -- particularly that the Project site is sited in an area prone to natural hazards.

F.8-234

The Project is inconsistent with Goal LU 5, which requires that land use patterns decrease greenhouse gas emissions. (DEIR at 5.8-28.) As discussed in above, the Project will disproportionately add to the region's GHG emissions by siting residents far from existing employment, schools, and city centers. The Project also is inconsistent with LU 5.1, which requires consistency with the Sustainable Communities Strategy. The Project is the antithesis of sustainable development and the DEIR even admits that the Project would exceed SCAG's population projections in the 2016-2040 RTP/SCS. (*See* DEIR at 5.8-2.) The Project similarly is not consistent with Policy LU 5.2, Policy LU 5.3, and Policy LU 5.4 because the Project will not necessarily provide for local employment opportunities, given that the developer can avoid developing commercial portions of the Project based upon "market conditions."

F.8-235

The Project is inconsistent with Policy LU 5.3, which requires the preservation of open space areas. (DEIR at 5.8-29.) The Project will result in approximately a reduction of approximately 6,000 acres of open space. The DEIR misleadingly states that the Project will

F.8-236

[41] *See* Los Angeles County General Plan (Oct. 6, 2015), available at http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan.pdf.

F.8-231A

help implement the Ranchwide Agreement and thereby preserves over 240,000 acres of contiguous open space areas (in perpetuity)…." (DEIR at 5.8-29.) Again, any commitments in the Ranchwide Agreement are unenforceable by the County and therefore irrelevant to the project proponent's mitigation here. Moreover, as discussed above, the DEIR only promises to preserve 3,681 acres "in perpetuity." (DEIR at 4-44.)

F.8-236 cont.

C. The Project is inconsistent with the AVAP's Mobility Element.

The DEIR is inconsistent with many of the goals and policies in the Mobility Element for the same reasons discussed throughout this letter – the Project will ***not*** require land use patterns that promote alternatives to the automobile (Goal M 1); (2) the Project will not minimize travel times or reduce vehicle trips (Policy M 1.1); (3) the Project will not reduce vehicle trips through effective transportation demand systems (Goal M 2). (*See* DEIR at 5.8-30.) Similarly, the Project will not effectively encourage trip reduction through carpools, vanpools or public transit (Policy M 2.2, Policy M 2.3, Policy M 2.4) because the DEIR contains no firm plans for actually reaching the goal of reducing single occupancy automobile use by 30 percent. (*See* DEIR at 5.8-31 & 5.21-66.)

F.8-237

D. The Project is inconsistent with the AVAP's Conservation and Open Space Element.

The Project is inconsistent with the AVAP's water resources policies for the reasons set forth in section XVI above. In particular, the Project is not guided by water supply constraints (Goal COS 1) and fails to identify sustainable water sources (Policy COS 1.1). (*See* DEIR at 5.8-41.) Likewise, although Policy COS 2.1 requires compliances with efficiency standards in the County Code, the DEIR only generally states that the Project's "Green Development Program" will reduce water use. (DEIR at 5.8-42.) Moreover, the DEIR's Water Resources section does not appear to add any further detail on whether the Project actual complies with the County Code.

F.8-238

The Project also is inconsistent with the previous version of the AVAP, which designated the Project site as an SEA. The DEIR should have required the implementation of Policy COS 4.4, which requires new development in SEAs to consider various factors, including preservation of biologically valuable habitats. (*See* DEIR at 5.8-45.)

F.8-239

As discussed in section XIV above, the Project would further impair air quality in the region by requiring residents to commute many miles to employment. Accordingly, the Project is not consistent with Air Quality COS 9, Policy COS 9.1, Policy COS 9.2, and Policy COS 9.3. (*See* DEIR at 5.8-51.)

F.8-240

E. The Project is inconsistent with the AVAP's Public Safety, Services, and Facilities Element.

The Project is inconsistent with the policies in the Public Safety, Services and Facilities element for the reasons discussed in sections VII and XV. For example, the Project will not adequately protect residents from fire or seismic hazards, violates policies limiting development in active seismic areas, and fails to contain proper measures to prevent landslides. (*See* DEIR at 5.8-60-61.)

F.8-241

Because the DEIR improperly concludes that the Project is consistent with the General Plan and AVAP, the DEIR's conclusion that no mitigation is required is similarly flawed. (*See* DEIR at 5.8-71.)

F.8-242

XVIII. Conclusion

Given the possibility that the Center will be required to pursue appropriate legal remedies in order to ensure enforcement of CEQA, we would like to remind the County of its duty to maintain and preserve all documents and communications that may constitute part of the "administrative record." As you may know, the administrative record encompasses any and all documents and communications which relate to any and all actions taken by the County with respect to the Project, and includes "pretty much everything that ever came near a proposed [project] or [] the agency's compliance with CEQA . . . ." (*County of Orange v. Superior Court* (2003) 113 Cal.App.4th 1, 8.) The administrative record further contains all correspondence, emails, and text messages sent to or received by the County's representatives or employees, which relate to the Project, including any correspondence, emails, and text messages sent between the County's representatives or employees and the project proponent's representatives or employees. Maintenance and preservation of the administrative record requires that, *inter alia*, the County (1) suspend all data destruction policies; and (2) preserve all relevant hardware unless an exact replica of each file is made.

F.8-243

Thank you for the opportunity to submit comments on the Project. We look forward to working to assure that the Project and environmental review conforms to the requirements of state law and to assure that all significant impacts to the environment are fully analyzed, mitigated or avoided. In light of many significant, unavoidable environmental impacts that will result from the Project, we strongly urge the Project not be approved in its current form. Please do not hesitate to contact the Center with any questions at the number listed below. We look forward to reviewing the County's responses to these comments in the Final EIR for this Project once it has been completed.

F.8-244

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Exhibit A

July 13, 2017

Mr. Jonathan Evans
Center for Biological Diversity
1212 Broadway, Suite 800
Oakland, California 94619

Subject: ***Review of Traffic, Access, and Circulation Analysis***
Centennial Project Draft Environmental Impact Report
Los Angeles County, California

Dear Mr. Evans:

As requested, Griffin Cove Transportation Consulting, PLLC (GCTC) has completed a review of the "Traffic, Access, and Circulation" analysis completed with respect to the proposed Centennial project in Los Angeles County, California. The proposed project is the subject of a Draft Environmental Impact Report (DEIR) prepared for the County of Los Angeles, Department of Regional Planning. (Reference: Bonterra Psomas, *Centennial Project Draft Environmental Impact Report*, May 2017) The DEIR incorporates (as Appendix 5.10-A) a traffic study prepared by Stantec. (Reference: Stantec, *Centennial Specific Plan Traffic Study*, May 2017) F.8-350

Our review focused on the technical adequacy of the "Traffic, Access, and Circulation" analysis, including the detailed procedures and conclusions documented in the Stantec report. F.8-351

TRAFFIC, ACCESS, AND CIRCULATION ANALYSIS REVIEW

Our review of the traffic impact analysis for the proposed Centennial project revealed several issues that must be addressed prior to certification of the environmental document and approval of the project by the County of Los Angeles. These issues are presented below. F.8-352

1. ***Traffic Volume Data*** – We identified a number of issues relating to the traffic volume data used in the analysis. F.8-353

   Obsolete Intersection Traffic Volume Data

   DEIR p. 5.10-21 states that the intersection traffic volume data used in the analysis was collected in 2014 and 2015. Thus, some of the traffic volumes are now three years old. F.8-354

   This is a violation of Los Angeles County policy. Specifically, page 3 of the document entitled, *Traffic Impact Analysis Report Guidelines* (Reference: County of Los Angeles, Department of Public Works, January 1, 1997) states: F.8-355

   > *Count data should not be over one year old.*

   Furthermore, the Los Angeles County Metropolitan Transportation Authority (Metro) provides similar guidance (Reference: LACMTA, *2010 Congestion Management Program*, Appendix D – Guidelines for CMP Transportation Impact Analysis, Section D.5.1 – Existing Traffic Conditions, p. D-2): F.8-356

   > *Traffic counts must be less than one year old at the time the study is initiated.*

Although the exact date on which the Stantec study was initiated is unknown, the Notice of Preparation for the DEIR was issued on October 2, 2015. Thus, any count conducted prior to October 2014 would be out of date, according to the guidance from Los Angeles County and Metro. F.8-357

In addition to violating local standards regarding traffic volume data, this is contrary to accepted practice within the traffic engineering profession. Page 19 of the 2006 Institute of Transportation Engineers (ITE) document, *Transportation Impact Analyses for Site Development*, specifically states that: F.8-358

> *. . . traffic volume data should generally be no older than 1 year.*

Stantec Table 2-2 (p. 2.10) lists the dates on which the intersection counts were conducted. Thirteen locations were counted in March or April 2014, including the following: F.8-359

- 28. Interstate 5 (I-5) Northbound Ramps/State Route 126 (SR 126) – March 4, 2014;
- 29. I-5 Southbound Ramps/SR 126 – April 1, 2014;
- 30. The Old Road/I-5 Southbound Ramps – March 11, 2014;
- 31. I-5 Southbound Ramps/Magic Mountain – March 11, 2014;
- 32. I-5 Northbound Ramps/Magic Mountain – March 5, 2014;
- 33. I-5 Southbound Ramps/Valencia – March 11, 2014;
- 34. I-5 Northbound Ramps/Valencia – March 11, 2014;
- 35. I-5 Southbound Ramps/McBean – March 13, 2014;
- 36. I-5 Northbound Ramps/McBean – March 11, 2014;
- 37. I-5 Southbound/Marriott & Pico/Lyons – March 11, 2014;
- 38. I-5 Northbound Ramps/Lyons Ave. – March 11, 2014;
- 39. I-5 Southbound Ramps/Calgrove – March 11, 2014; and
- 40. I-5 Northbound Ramps/Calgrove – March 11, 2014.

All of the counts listed above exceed the one-year standard set forth by Los Angeles County and Metro.

Intersection Counts Not Conducted on School Days

In addition to the age of the intersection traffic volume data, a number of the counts violate the Metro standard with respect to when counts may be performed. Specifically, the Congestion Management Program guidelines state (Reference: LACMTA, *2010 Congestion Management Program*, Appendix A – Guidelines for Biennial Highway Monitoring, Section A.4 – Traffic Count Requirements, p. A-2): F.8-360

> *Traffic counts must be taken on days when local schools or colleges are in session.*

Referring again to Stantec Table 2-2 (p. 2.10), we see that the counts at the following sixteen locations were performed in July 2015, when local schools and colleges were almost certainly not in session:

- 3. 300th St. W./State Route 138 (SR 138) – July 14, 2015;
- 6. Three Points Road/SR 138 – July 14, 2015;
- 7. 245th St. W./SR 138 – July 14, 2015;
- 8. 230th St. W./SR 138 – July 14, 2015;
- 9. 190th St. W./SR 138 – July 14, 2015;
- 10. 170th St. W./SR 138 – July 14, 2015;
- 11. 110th St. W./SR 138 – July 14, 2015;
- 12. 90th St. W./SR 138 – July 14, 2015;
- 13. 60th St. W./SR 138 – July 14, 2015;
- 14. 30th St. W./SR 138 – July 14, 2015;
- 15. State Route 14 (SR 14) Southbound Ramps/SR 138 – July 14, 2015;
- 16. SR 14 Northbound Ramps/SR 138 – July 14, 2015;
- 17. 90th/Willow Springs/Rosamond – July 14, 2015;
- 18. Willow Springs/Oak Creek – July 14, 2015;
- 19. Willow Springs/Highline – July 14, 2015; and
- 20. Bear Mountain Blvd./SR 223/Wheeler Ridge Rd. – July 14, 2015.

F.8-361

Obsolete State Route 138 Traffic Volume Data

The DEIR (p. 5.10-21) states:

> *For State highways, traffic count data was obtained from the Caltrans Traffic Census, the Caltrans Performance Measurement System (PeMS) and the Los Angeles County Department of Public Works Machine Count Traffic Volumes database. These traffic counts represent 2014 and 2010 conditions, which is the most current data available from Caltrans and the County, respectively, at this time.*

F.8-362

Stantec p. 2.20 provides additional detail:

> *Along SR-138, traffic counts were collected in 2015 and supplemented by 2010 peak hour traffic count data obtained from the LA County Department of Public Works (LADPW) Machine Count database. The peak hour data was used to derive representative K and D factors for the SR-138 from the I-5 to SR-14 freeways.*

F.8-363

Obviously, data from the year 2010 is too old to be valid, given the guidance referenced above from Los Angeles County and Metro. Even if the 2010 values were only used to "derive representative K

F.8-364

and D factors," there is no certainty that factors from 2010 would, in fact, be representative of conditions prevailing at the time the study was initiated. F.8-364 cont.

Given that California and the nation were still suffering from the effects of the "Great Recession" in 2010, travel patterns were certainly atypical during that period. This would particularly affect the K factor, which is an indication of the proportion of daily traffic that occurs in the peak hour. Since employment rates were reduced during the recession, peak-hour travel (which largely consists of commuter trips) was also reduced, so the K factor would not represent typical conditions. According to information on the California Employment Development Department website, the seasonally-adjusted unemployment rate (by month) in 2010 in California was 12.1 – 12.2 percent. In contrast, the seasonally-adjusted unemployment rate for October 2015 (when the NOP was issued) was 5.8 percent. (Attachment A contains that data.) This strongly suggests that K factors derived in 2010 would be too low to provide an accurate indication of current peak-hour travel patterns. In particular, the peak-hour volumes are probably underestimated, which would lead to overly-optimistic V/C ratios and levels of service. F.8-365

Freeway Peak-Hour Volumes Estimated

With respect to the freeway traffic volumes used in the traffic analysis, Stantec p. 2.6 says: F.8-366

> *Peak hour traffic count data were derived by using K (peak hour volume factor) and D (directional factor) values in the AM and PM peak periods for each respective segment in order to calculate peak hour volumes by direction. . . . These peak hour volumes represent the mean (average) weekday volume plus one standard deviation for weekdays for the month of October 2013.*

Thus, instead of being based on actual traffic volumes determined through counts on the freeway facilities, the analysis is based on estimated values. There is no certainty that these estimates accurately reflect the volume of traffic on the freeway facilities evaluated in the traffic study. The use of such estimated values in place of actual data must be further explained and justified. F.8-367

Moreover, the estimated volumes represent the level of activity in October 2013, which violates the guidelines discussed above with respect to the appropriate age of traffic volume data. Also, with respect to the validity of the K factor used to estimate these values, as shown in Attachment A, the seasonally-adjusted unemployment rate in California in October 2013 was 8.5 percent, compared to 5.8 percent in October 2015 when the NOP was issued. Thus, the peak-hour volumes are likely to be underestimated. F.8-368

Conclusion

Because the traffic volumes represent the most critical input parameter in the level of service calculation process, any inaccuracies in those values directly affect the validity of the level of service results. In short, to the extent that the existing traffic volumes fail to represent current conditions in the study area, the corresponding level of service results reported in the DEIR are invalid, and a misleading representation of the environmental setting and project-related impacts will be provided. F.8-369

New traffic volume data must be obtained for the study intersections and other roadway facilities, and the analysis must be revised to incorporate that new data. F.8-370

2. ***Study Area*** – Stantec Figure 1-3 (p. 1.5) illustrates the study area for the traffic analysis. (No equivalent figure is presented in the DEIR "Traffic, Access, and Circulation" section.) To the north of the Project site, the study area includes State Route 99 (SR 99), north of the point where it splits off from I-5. The section of I-5 north of that point is ignored, however. F.8-371

   Stantec Figure 2-4 (p. 2.9) indicates that I-5 north of SR 99 carried about 48,000 vehicles per day (VPD) in 2014 or 2015, compared to 27,000 VPD on SR 99. According to Stantec Figure 4-1 (p. 4.4), the proposed Project would add 2,100 trips per day to this section of I-5, for an "Existing Plus Project" total of 50,100 VPD. The "Existing Plus Project" total on SR 99 just north of the I-5 split will be 33,200 VPD. Thus, the daily traffic volume on I-5 will substantially exceed the corresponding volume on SR 99 under "Existing Plus Project" conditions. (Cumulative conditions traffic forecasts for this segment of I-5 are discussed below.) F.8-372

   To ensure a thorough analysis of project-related impacts on the regional freeway system, I-5 north of SR 99 must be added to the study area. F.8-373

3 ***Freeway Mainline Analysis Procedure*** – Stantec p. 9 says:

   > *Caltrans utilizes the methodology described in the Highway Capacity Manual (HCM) to estimate density and LOS* [Level of Service] *for freeway analysis, so for the purpose of this study those same HCM methods have been utilized to derive the capacities employed for the V/C* [Volume/Capacity] *calculations . . .*

   Moreover, Stantec p. 1.12 states:

   > *Capacities for calculating peak hour V/C ratios for freeway mainline segments are derived with the methodology utilized in the* HCM 2010.

   Similarly, DEIR p. 5.10-16 says: F.8-374

   > *Freeway capacities on a per-lane basis within the Project study area were derived for existing conditions using the methodology outlined in the* 2010 Highway Capacity Manual *(TRB 2010).*

   These statements suggest that the analysis of freeway mainline segments was performed using the pertinent methodology documented in Chapter 11 of the *Highway Capacity Manual 2010* (Transportation Research Board, Fifth Edition, December 2010.) This is not the case, however.

   Caltrans, in its December 2002 document, *Guide for the Preparation of Traffic Impact Studies*, identifies the appropriate methodologies for analysis for various types of roadways. With respect to freeway segments, page 5 of that document states that the operational analysis within the *Highway Capacity Manual* should be employed. This point is reinforced in Appendix C to the Caltrans document (which is Attachment B here), which presents the accepted "measures of effectiveness" (MOE) for various types of roadway facilities. As shown there, the appropriate MOE for freeways is density, in terms of passenger cars per mile per lane (PC/MI/LN). Density is determined through application of the *Highway Capacity Manual* procedure. F.8-375

   In contrast, the DEIR analysis of freeway mainline segments was based on development of volume/capacity (V/C) ratios for each analysis scenario and comparison of the derived values to information presented in Exhibit 23-2 (p. 23-4) of the year 2000 edition of the *Highway Capacity* F.8-376

Manual. Those values are presented in Stantec Table 1-3 (p. 1.13), which also contains a footnote that correctly states:

> *Density is the primary determinant of LOS.*

F.8-376 cont.

In short, it is clear that Caltrans calls for freeway mainline analyses to be performed using the current version of the *Highway Capacity Manual*, but that the DEIR did not employ that method. As such, it might be valuable to present information describing the differences between the two methods.

F.8-377

As described above, the freeway segment analysis presented in the DEIR is a relatively simplistic volume/capacity (V/C) ratio evaluation, which is typically used in the most broad brush sorts of planning analyses. In such an analysis, the volumes represent either the existing traffic volumes or the future traffic forecasts.

F.8-378

The current state-of-the-art for analysis of freeways is documented in the *Highway Capacity Manual*. The *Highway Capacity Manual* represents the culmination of thousands of hours of research into the nature of vehicular traffic flow on all types of roadway facilities, including freeways. Chapter 11 of the *Highway Capacity Manual 2010* describes the concepts underlying the analysis of freeway segments, as well as the pertinent analysis procedures. According to the *HCM 2010*, level of service on freeway segments is determined based on traffic density, in terms of passenger cars per mile per lane (PC/MI/LN).

F.8-379

Although traffic operations is a highly complex subject, it may be worthwhile to compare the various factors employed in the simplistic V/C ratio evaluation used in the DEIR versus the methodology identified in the *HCM 2010*.

F.8-380

Comparison of Input Parameters

Completion of a V/C analysis requires the following inputs:

- Volume (either measured or estimated), and
- Capacity (typically estimated or assumed; rarely measured).

F.8-381

In contrast, completion of a level of service analysis for a freeway segment under the *HCM 2010* methodology requires the following input parameters (*HCM 2010*, Exhibit 11-16, p. 11-21), in addition to hourly vehicular volume:

- Number of lanes,
- Lane width,
- Lateral clearance,
- Interchange density,
- Specific grade or general terrain description (i.e., level, rolling, or mountainous),
- Base free-flow speed,
- Length of analysis period,

F.8-382

- Peak-hour factor (i.e., a representation of the distribution of traffic flow over the peak-hour period),
- Percentage of heavy vehicles (i.e., trucks and recreational vehicles), and
- Driver population factor.

F.8-382 cont.

Clearly, the nature and quantity of the input requirements associated with the *HCM 2010* analysis procedure would lead to a more accurate representation of conditions on the study area freeway segments than the DEIR discloses. This leads to an initial conclusion that the level of service results derived using the *HCM 2010* procedure would be more reflective of the physical and operational characteristics of those facilities than would ever be possible using the simplistic V/C approach. However, other considerations also apply, as described below.

F.8-383

Comparison of Analysis Procedures

With the various input parameters established, it might be helpful to summarize the analysis procedures associated with each of the two techniques.

F.8-384

For a standard V/C ratio analysis, the procedure requires the following:

1. Divide measured or estimated volume by estimated or assumed capacity.
2. Compare the resulting V/C ratio to appropriate level of service criteria.

F.8-385

On the other hand, conduct of a freeway segment level of service analysis using the *HCM 2010* method involves the following steps. (*HCM 2010*, Exhibit 11-7, p. 11-10):

1. Establish and input the data listed above.
2. Compute the road's free-flow speed, adjusting as necessary to reflect the number of lanes, lane width, lateral clearance, and interchange density.
3. Select the speed-flow curve.
4. Adjust the traffic volume to reflect traffic flow patterns (i.e., number of lanes, peak-hour factor, heavy vehicle percentage, driver population, and terrain/grades) for use in estimating the flow rate.
5. Determine the speed using the speed-flow curve.
6. Compute the density using the flow rate and speed.
7. Determine the level of service.

F.8-386

While we are not suggesting that complexity alone equates to a higher level of accuracy, we are inclined to believe that the numerous adjustments incorporated into the *HCM 2010* methodology result in an analysis procedure that better reflects the actual physical characteristics of the roadway, as well as the local traffic flow patterns.

F.8-.387

In summary, it is readily apparent that, compared to the simplistic V/C ratio approach used in the DEIR, the *HCM 2010* methodology would provide a superior indication of operating conditions on I-5, SR 99, and SR 14 through the study area. Consequently, in keeping with the guidance provided in the Caltrans *Guide for the Preparation of Traffic Impact Studies*, we believe that the analysis should

F.8-388

be revised to incorporate an analysis using the *HCM 2010* procedures, and the results should be circulated for further public review. F.8-388 cont.

4 ***Freeway Ramp Analysis Procedure*** – Referring again to Attachment B, we see that Caltrans has identified density as the appropriate measure of effectiveness for freeway ramps. Despite this, the DEIR analysis of freeway ramps was based on development of V/C ratios for the ramp roadways and comparison of those ratios to defined level of service ranges. These calculations again employ certain assumptions with regard to the capacity of the ramps (e.g., 1,500 vehicles per hour for a one-lane ramp). F.8-389

However, the *Highway Capacity Manual 2010* specifically states (p. 13-4): F.8-390

> *LOS is not defined for ramp roadways . . .*

Instead, the *HCM 2010* methodology (which measures ramp operations in terms of traffic density) addresses operations in the "ramp influence area," which is defined as the 1,500-foot section of freeway in advance of an off-ramp or downstream of an on-ramp. This particular approach reflects the *HCM 2010* statement (p. 13-2): F.8-391

> *Ramps and ramp junctions do not operate independently of the roadways they connect. Thus, operating conditions on the main roadways can affect operations on the ramp and ramp junctions, and vice versa.*

The DEIR approach totally ignores this interaction between the ramps and the adjacent freeway segments. It is, therefore, virtually meaningless and provides a misleading indication of the ramp operations. The ramp analyses must be revised, using the *HCM 2010* procedures. F.8-392

5. ***State Route 138 Analysis Procedure*** – For Existing and Existing Plus Project conditions, SR 138 was analyzed using the *Highway Capacity Manual 2010* methodology for two-lane highways. (Stantec, pp. 1.18 & 4.1) F.8-393

In the future, SR 138 will be improved to a four-lane expressway. (Stantec, p. 2.28) Under Cumulative and Cumulative Plus Project conditions, the Stantec analysis determined level of service based on V/C ratios, instead of using the *Highway Capacity Manual 2010* procedures for multi-lane highways. (Stantec, p. 1.20) According to the *HCM 2010*, level of service on multi-lane highways is, ". . . defined on the basis of density [in passenger cars/mile/lane], which is a measure of the proximity of vehicles to each other in the traffic stream." (*HCM* 2010, p. 14-4) V/C ratios, as employed in the Stantec analysis, are not considered meaningful indicators of the quality of traffic flow on such facilities. F.8-394

This inconsistency in approach, in which the *HCM 2010* procedures were used for certain scenarios but not for others, must be justified. If the *HCM 2010* methodology is appropriate for short-term conditions, why not also for cumulative conditions? F.8-395

6. ***Cumulative Conditions Daily Traffic Forecasts*** – Detailed review of the "without project" and "with project" traffic volume figures for cumulative conditions (Stantec Figures 4-3 and 4-4, pp. 4.26 and 4.27) reveals certain apparent anomalies in the future year traffic forecasts and the assignment of project trips to I-5, both north and south of the project site. F.8-396

Interstate 5 North of the Proposed Project

Stantec Figure 2-4 (p. 2.9) indicates that I-5 north of the I-5/SR 99 split currently carries 48,000 VPD. That value is not shown on the figure, but can be easily derived by subtracting the volume on SR 99 north of the split (27,000 VPD) from the combined I-5/SR 99 volume south of the split (75,000 VPD). F.8-397

In comparison, Stantec Figure 4-3 (p. 4.26) indicates that under Cumulative No Project conditions (in the year 2035 or 2040), I-5 north of the I-5/SR 99 split will carry only 44,000 VPD, a reduction of 4,000 VPD from the current volume. Again, that value must be derived by subtracting the 66,000 VPD projected to be on SR 99 north of the I-5/SR 99 split from the 110,000 VPD shown south of the split. Clearly, this significant reduction in traffic on I-5 in the future seems counter-intuitive and must be explained. F.8-398

Even under "Cumulative Plus Project" conditions, Stantec Figure 4-4 (p. 4.27) indicates that only 49,000 VPD will be on I-5 north of the split, an increase of only 1,000 VPD over the existing volume. F.8-399

To gain additional perspective on this issue, we sought out other sources of traffic volume projections on I-5. The primary source of such information is the *Interstate 5 Transportation Concept Report* (Caltrans, Office of System Planning, District 6, February 2013). Attachment C presents excerpts from that document. The Transportation Concept Report provides daily and peak-hour traffic volume information for the years 2011, 2020, and 2035. The portion of I-5 immediately south of the I-5/SR 99 split is designated Segment 3, and I-5 just north of the split is Segment 4. Table 1 summarizes the daily traffic volume information for these two segments, as presented in Summary Chart 2A in the *Transportation Concept Report*. For comparison, the corresponding Cumulative Plus Project traffic projections presented in the DEIR are also shown. F.8-400

Table 1
Traffic Volume Summary
Interstate 5 – Segments 3 and 4

	Annual Average Daily Traffic (AADT)			
	Caltrans – I-5 Transportation Concept Report[1]		DEIR/Stantec – Cumulative (2035/2040) Plus Project[2]	
Year	Segment 3 (South of I-5/SR 99 Split	Segment 4 (North of I-5/SR 99 Split)	Segment 3 (South of I-5/SR 99 Split	Segment 4 (North of I-5/SR 99 Split)
2011	81,000	41,000		
2020	115,500	58,500		
2035	179,900	91,100	118,000	49,000

Notes:
[1] Reference: Caltrans, Office of System Planning, District 6, *Interstate 5 Transportation Concept Report*, February 2013.
[2] Reference: Stantec, *Centennial Specific Plan Traffic Study*, May 2017

On Segment 3 (south of the split), Caltrans forecasts a year 2035 daily traffic volume of 179,900 VPD. In comparison, the DEIR indicates that the 2035/2040 daily volume on that segment of I-5 will be 118,000, which is approximately two-thirds of the Caltrans forecast. On Segment 4 (north of the split), Caltrans projects 91,100 VPD in 2035, while the DEIR indicates a daily volume of 49,000 in 2035 or 2040, which is only 54 percent of the Caltrans estimate. F.8-401

Clearly, the DEIR analysis substantially underestimated the future year traffic volumes on I-5 north of the project site. This leads, in turn, to understatement of the V/C values on I-5 and, potentially, the failure to identify significant project-related impacts. In short, the DEIR provides no meaningful indication of the future level of service for that facility. F.8-402

The analysis must be revised to reflect the level of traffic growth projected by Caltrans and to provide an accurate indication of the future operating conditions on I-5. F.8-403

Interstate 5 South of the Proposed Project

Table 2 summarizes the cumulative conditions project traffic volumes on I-5 between SR 138 and SR 126. F.8-404

Table 2
Project Traffic – Interstate 5

Interstate 5 Segment	Daily Traffic Volume (Vehicles/Day)		
	Cumulative With Project	Cumulative Without Project	Project Traffic
SR 138 – Smokey Bear Rd.	127,000	105,000	22,000
Smokey Bear Rd. – Vista Del Lago Rd.	129,000	110,000	19,000
Vista Del Lago Rd. – Templin Hwy.	129,000	117,000	12,000
Templin Hwy. – Lake Hughes Rd.	130,000	114,000	16,000
Lake Hughes Rd. – Parker Rd.	158,000	140,000	18,000
Parker Rd. – Hasley Canyon Rd.	175,000	160,000	15,000
Hasley Canyon Rd. – SR 126	174,000	163,000	11,000

Source: Stantec, *Centennial Specific Plan Traffic Study*, May 2017, Figures 4-3 & 4-4 (pp. 4.26 & 4.27) and Table 4-6 (p. 4.33).

As shown, the project traffic volumes steadily drop from 22,000 vehicles per day (VPD) at SR 138 to 12,000 VPD at Templin Highway, but then they jump up to 16,000 VPD at Lake Hughes Road. Then, they jump even higher (18,000 VPD) at Parker Road before beginning to fall again. F.8-405

The apparent loss of a substantial amount of project traffic between Vista Del Lago Road and Templin Highway is particularly interesting. Attachment D contains a Google Earth aerial image of I-5 at Vista Del Lago Road. As shown, that road connects only to the Vista Del Lago Visitors Center on the east side of Pyramid Lake, immediately west of I-5. No connections exist that would allow F.8-406

project traffic to enter or exit I-5 at this location. Further, nothing in the DEIR or the Stantec traffic study indicates that any future road connections will be provided that might accommodate project traffic at this location. F.8-406 cont.

At Templin Highway, such road connections might exist (e.g., Old Ridge Route/Ridge Route Road), but they are twisty, two-lane roads that are not well-suited to carrying commute traffic or other trips where travel time is a consideration. Aside from recreational trips, I-5 would certainly be a preferable route. F.8-407

These inconsistent project traffic numbers raise questions regarding the validity of the project traffic assignment. Why would the project traffic between Vista Del Lago Road and Templin Highway be so much lower than on either of the adjacent I-5 segments? And why would the project traffic volume on I-5 between Lake Hughes Road and Parker Road be greater than on either adjacent segment? F.8-408

If the answer to either of these questions is that project traffic has been assigned to minor roads that eventually feed into I-5 (but that apparently have not been fully described in the DEIR), then this must be documented and the ability of those minor roads to accommodate that traffic must be evaluated. If, on the other hand, no logical explanation can be provided for these inconsistencies, then the project traffic assignment must be modified to eliminate the anomalies. F.8-409

7. ***Deficient Construction Traffic Analysis*** – The Stantec study completely fails to address the potential construction-related traffic impacts of the proposed project. Oddly, the only mention of construction-related traffic impacts in either document occurs at DEIR pp. 5.10-140 – 5.10-141 under "Threshold 10-5 Will the project result in inadequate emergency access?" At the end of that section is the following "analysis" of construction-related impacts: F.8-410

> *Construction of the proposed off-site project features would lead to temporary obstruction of roadways where utility lines connections* [sic] *and roadway improvements are planned but this impact would be temporary and would occur at scattered locations. Compliance with the Greenbook and Graybook and implementation of traffic management plans during construction (MM 10-5) would prevent traffic and emergency access obstruction. Impacts would be less than significant.*

This significance determination is unsubstantiated, as no analysis was documented that would allow such a conclusion to be reached. For example, how much traffic will be generated during each phase and sub-phase of construction? What analysis was performed with respect to construction-related capacity impacts? F.8-411

Full consideration of construction-related impacts at the study locations would identify both the number of construction-worker vehicles and the volume of heavy trucks in each phase. Further, appropriate factors would be applied to convert the truck volumes to "passenger car equivalents," in recognition of the reduced operating characteristics of heavy vehicles (e.g., greater size, slower acceleration, increased braking distance, etc.). F.8-412

In this case, no evidence is presented to document the number of peak-hour employee and truck trips that would occur during the construction period associated with each phase of the proposed project. Without that basic information, it is simply impossible to make a determination regarding the significance of project-related construction impacts. F.8-413

The DEIR must be revised to incorporate a credible analysis of the project's construction-related impacts. F.8-414

8. ***Average Trip Length*** – Stantec Table 3-5 (p. 3.9) shows that the overall average trip length for project-generated traffic will be 25.5 miles, with "external" trips (i.e., those that have an origin or a destination outside the project) having an average trip length of 45.9 miles. Although trip lengths have no effect on the level of service at any of the intersections and roads within the study area, these extraordinary values demonstrate clearly that the project exemplifies the worst elements of "sprawl," with its related issues of fuel consumption and pollutant emissions. F.8-415

9. ***Transit Trips*** – Stantec Table 5-2 (p. 5.4) says the project will generate 10,604 daily transit trips, including 810 AM peak hour transit trips and 850 PM peak hour transit trips. There is no indication, though, as to how these trips will be accommodated. F.8-416

   DEIR Mitigation Measure 29 (which is equivalent to Stantec Mitigation Measure 24) calls for implementation of a "Mobility Plan," including provision of a Transportation Management Association (TMA) that would coordinate and manage a variety of "ongoing transportation improvements and programs," including a ride share program, a transit program, and a commuter bus program. (DEIR, p. 5.10-104) F.8-417

   It is not clear, however, how much actual transit service would be provided through the TMA. Stantec p. 4.59 describes provision of "10 to 15 commuter vans or 2 buses to (AM) and from (PM) the Santa Clarita Valley and 5 to 7 commuter vans or 1 bus [to/from] the Antelope Valley." Based on the stated capacity of 50 passengers per bus, this will serve 150 commuters (300 daily transit trips). What about the other 10,304 daily transit trips? F.8-418

   Similarly, this leaves 660 AM peak hour and 700 PM peak hour transit trips unaccounted for. Using the 50 passengers/bus factor presented in the Stantec study, another 14 busloads worth of transit passengers need to be accommodated in each of the peak hours. On a daily basis, the stated transit demand equates to 212 busloads, yet the DEIR provides no certainty that the necessary transit service will actually materialize. F.8-419

   The DEIR must be revised to provide specific information regarding the level of transit service to be provided, both internal and external to the proposed project. F.8-420

CONCLUSION

Our review of the Traffic, Access, and Circulation analysis completed in connection with the proposed Centennial project revealed several issues affecting the validity of the conclusions presented in the Draft Environmental Impact Report. These issues must be addressed prior to approval of the proposed project and its environmental documentation by the County of Los Angeles. F.8-421

We hope this information is useful. If you have questions concerning any of the items presented here or would like to discuss them further, please feel free to contact us at (906) 847-8276.

F.8-422

Sincerely,

GRIFFIN COVE TRANSPORTATION CONSULTING, PLLC

Neal K. Liddicoat, P.E.
Principal

Attachments

ATTACHMENT A

"LABOR FORCE AND UNEMPLOYMENT RATE FOR CALIFORNIA STATEWIDE"

(Source: California Employment Development Department)

Unsaved View Save As... Revert

Based on Labor Force and Unemployment Rate for California Statewide

This dataset contains statewide aggregate

	Area Name	Area Type	Date	Year	Month	Seasonally	Unemployment Rate	Status (Prelim
1	California	State	12/01/2010	2010	December	N	12.1%	Final
2	California	State	12/01/2010	2010	December	Y	12.1%	Final
3	California	State	11/01/2010	2010	November	Y	12.1%	Final
4	California	State	11/01/2010	2010	November	N	12.3%	Final
5	California	State	10/01/2010	2010	October	N	11.9%	Final
6	California	State	10/01/2010	2010	October	Y	12.2%	Final
7	California	State	09/01/2010	2010	September	Y	12.2%	Final
8	California	State	09/01/2010	2010	September	N	11.9%	Final
9	California	State	08/01/2010	2010	August	Y	12.1%	Final
10	California	State	08/01/2010	2010	August	N	12.3%	Final
11	California	State	07/01/2010	2010	July	Y	12.1%	Final
12	California	State	07/01/2010	2010	July	N	12.6%	Final
13	California	State	06/01/2010	2010	June	N	12%	Final
14	California	State	06/01/2010	2010	June	Y	12.1%	Final
15	California	State	05/01/2010	2010	May	N	11.7%	Final
16	California	State	05/01/2010	2010	May	Y	12.1%	Final
17	California	State	04/01/2010	2010	April	N	12%	Final
18	California	State	04/01/2010	2010	April	Y	12.2%	Final
19	California	State	03/01/2010	2010	March	Y	12.2%	Final
20	California	State	03/01/2010	2010	March	N	12.6%	Final
21	California	State	02/01/2010	2010	February	Y	12.2%	Final
22	California	State	02/01/2010	2010	February	N	12.6%	Final
23	California	State	01/01/2010	2010	January	Y	12.1%	Final
24	California	State	01/01/2010	2010	January	N	12.7%	Final

Unsaved View Save As... Revert

Based on Labor Force and Unemployment Rate for California Statewide

This dataset contains statewide aggregate

	Area Name	Area Type	Date	Year	Month	Seasonally	Unemployment Rate	Status (Prelim
1	California	State	12/01/2013	2013	December	N	8%	Final
2	California	State	12/01/2013	2013	December	Y	8.2%	Final
3	California	State	11/01/2013	2013	November	Y	8.3%	Final
4	California	State	11/01/2013	2013	November	N	8.3%	Final
5	California	State	10/01/2013	2013	October	N	8.5%	Final
6	California	State	10/01/2013	2013	October	Y	8.5%	Final
7	California	State	09/01/2013	2013	September	Y	8.6%	Final
8	California	State	09/01/2013	2013	September	N	8.5%	Final
9	California	State	08/01/2013	2013	August	Y	8.7%	Final
10	California	State	08/01/2013	2013	August	N	8.9%	Final
11	California	State	07/01/2013	2013	July	Y	8.8%	Final
12	California	State	07/01/2013	2013	July	N	9.3%	Final
13	California	State	06/01/2013	2013	June	N	9.2%	Final
14	California	State	06/01/2013	2013	June	Y	8.9%	Final
15	California	State	05/01/2013	2013	May	N	8.6%	Final
16	California	State	05/01/2013	2013	May	Y	9%	Final
17	California	State	04/01/2013	2013	April	N	8.7%	Final
18	California	State	04/01/2013	2013	April	Y	9.1%	Final
19	California	State	03/01/2013	2013	March	Y	9.2%	Final
20	California	State	03/01/2013	2013	March	N	9.3%	Final
21	California	State	02/01/2013	2013	February	Y	9.3%	Final
22	California	State	02/01/2013	2013	February	N	9.7%	Final
23	California	State	01/01/2013	2013	January	Y	9.5%	Final
24	California	State	01/01/2013	2013	January	N	10.2%	Final

F.8-423 cont.

Unsaved View Save As... Revert

Based on Labor Force and Unemployment Rate for California Statewide

This dataset contains statewide aggregate

	Area Name	Area Type	Date	Year	Month	Seasonally	Unemployment Rate	Status (Prelim
1	California	State	12/01/2015	2015	December	N	5.6%	Final
2	California	State	12/01/2015	2015	December	Y	5.7%	Final
3	California	State	11/01/2015	2015	November	Y	5.8%	Final
4	California	State	11/01/2015	2015	November	N	5.7%	Final
5	California	State	10/01/2015	2015	October	N	5.7%	Final
6	California	State	10/01/2015	2015	October	Y	5.8%	Final
7	California	State	09/01/2015	2015	September	Y	5.9%	Final
8	California	State	09/01/2015	2015	September	N	5.6%	Final
9	California	State	08/01/2015	2015	August	Y	6%	Final
10	California	State	08/01/2015	2015	August	N	6.1%	Final
11	California	State	07/01/2015	2015	July	Y	6.1%	Final
12	California	State	07/01/2015	2015	July	N	6.5%	Final
13	California	State	06/01/2015	2015	June	N	6.3%	Final
14	California	State	06/01/2015	2015	June	Y	6.2%	Final
15	California	State	05/01/2015	2015	May	N	6.1%	Final
16	California	State	05/01/2015	2015	May	Y	6.3%	Final
17	California	State	04/01/2015	2015	April	N	6.2%	Final
18	California	State	04/01/2015	2015	April	Y	6.4%	Final
19	California	State	03/01/2015	2015	March	Y	6.5%	Final
20	California	State	03/01/2015	2015	March	N	6.7%	Final
21	California	State	02/01/2015	2015	February	Y	6.6%	Final
22	California	State	02/01/2015	2015	February	N	6.9%	Final
23	California	State	01/01/2015	2015	January	Y	6.8%	Final
24	California	State	01/01/2015	2015	January	N	7.2%	Final

F.8-423 cont.

ATTACHMENT B

APPENDIX C
CALTRANS MEASURES OF EFFECTIVENESS

(Source: Caltrans, *Guide for the Preparation of Traffic Impact Studies, December 2002*)

F.8-424
cont.

GUIDE FOR THE PREPARATION

OF

TRAFFIC IMPACT STUDIES

STATE OF CALIFORNIA
DEPARTMENT OF TRANSPORTATION

December 2002

APPENDIX "C"

MEASURES OF EFFECTIVENESS

BY

FACILITY TYPE

MEASURES OF EFFECTIVENESS BY FACILITY TYPE

TYPE OF FACILITY	MEASURE OF EFFECTIVENESS (MOE)
Basic Freeway Segments	Density (pc/mi/ln)
Ramps	Density (pc/mi/ln)
Ramp Terminals	Delay (sec/veh)
Multi-Lane Highways	Density (pc/mi/ln)
Two-Lane Highways	Percent-Time-Following Average Travel Speed (mi/hr)
Signalized Intersections	Control Delay per Vehicle (sec/veh)
Unsignalized Intersections	Average Control Delay per Vehicle (sec/veh)
Urban Streets	Average Travel Speed (mi/hr)

Measures of effectiveness for level of service definitions located in the most recent version of the Highway Capacity Manual, Transportation Research Board, National Research Council.

F.8-424 cont.

ATTACHMENT C

SUMMARY CHART 2A
INTERSTATE 5 TRANSPORTATION CONCEPT REPORT

(Reference: Caltrans, Office of System Planning, District 6,
***Interstate 5 Transportation Concept Report*, February 2013)**

F.8-425
cont.

STATE ROUTE

INTERSTATE 5

TRANSPORTATION CONCEPT REPORT

OFFICE OF SYSTEM PLANNING · DISTRICT 6 · FEBRUARY 2013

Caltrans

Interstate 5 Transportation Concept Report

Interstate 5: From the Los Angeles County line to the Merced County line

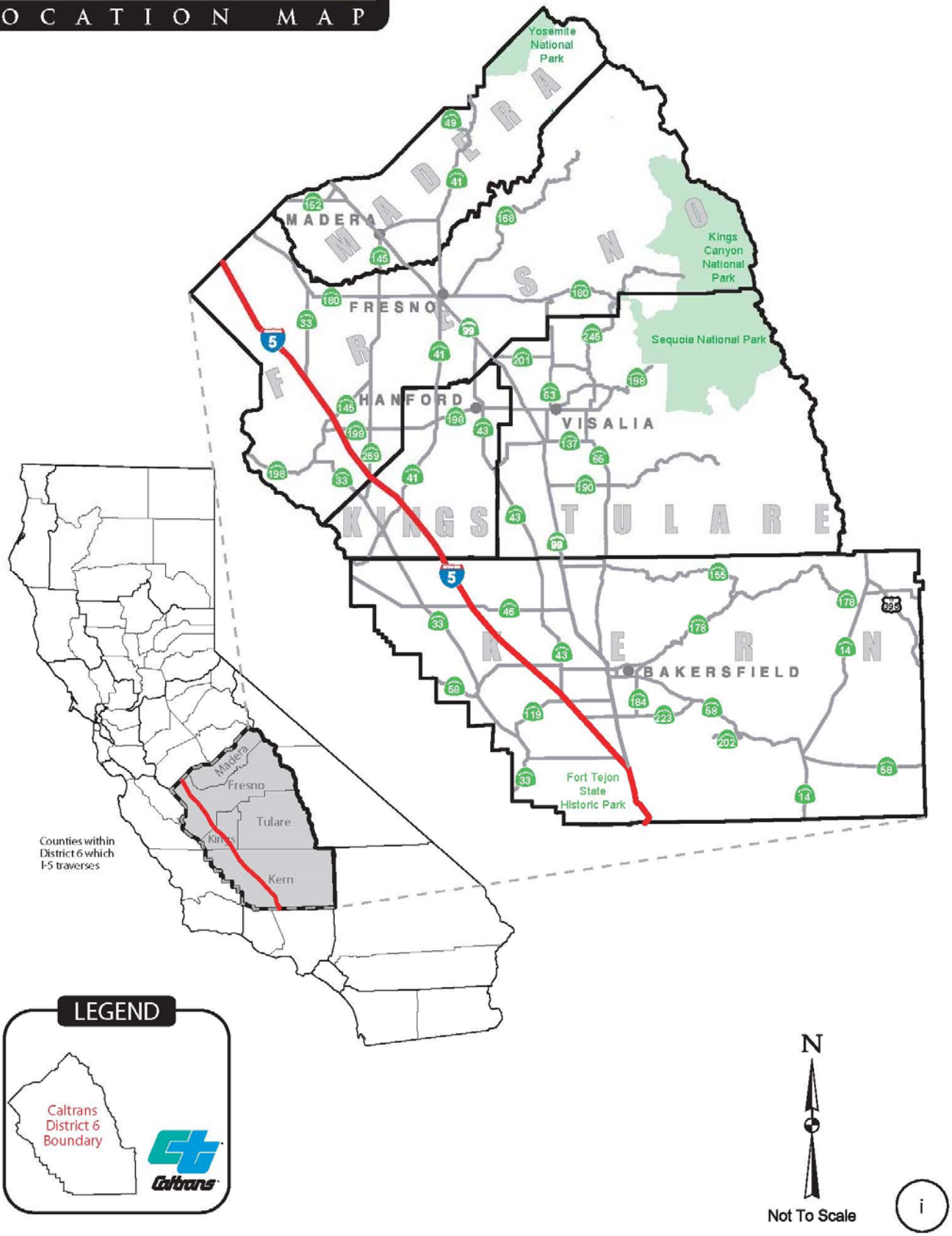
Caltrans District 6 – Pos tmile: (KER R0.00 to FRE 66.16)

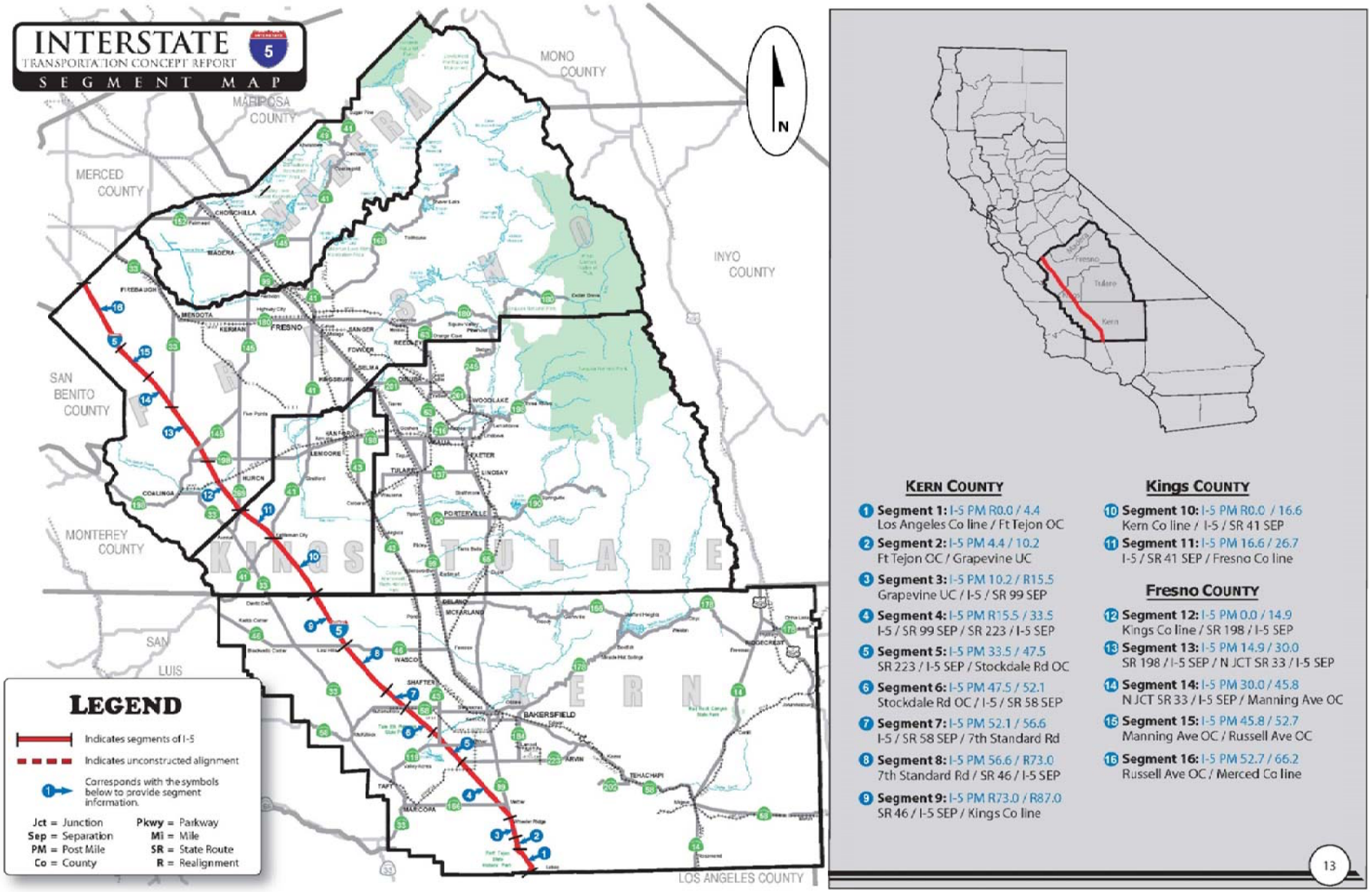
I approve this Transportation Corridor Report as the overall Policy Statement and Strategic Plan that will guide transportation decisions and investments for the Interstate 5 Corridor.

Gail Miller
Deputy District Director
Planning and Local Assistance
Caltrans - District 6

Sharri Bender-Ehlert
District Director
Caltrans – District 6

INTERSTATE 5
TRANSPORTATION CONCEPT REPORT
LOCATION MAP




INTERSTATE
TRANSPORTATION CONCEPT REPORT
5
SEGMENT MAP
MONO COUNTY
MARIPOSA COUNTY
MERCED COUNTY
INYO COUNTY
SAN BENITO COUNTY
MONTEREY COUNTY
SAN LUIS
LOS ANGELES COUNTY
FRESNO
KINGS
TULARE
KERN
BAKERSFIELD
N
LEGEND
Indicates segments of I-5
Indicates unconstructed alignment
Corresponds with the symbols below to provide segment information.
Jct = Junction
Sep = Separation
PM = Post Mile
Co = County
Pkwy = Parkway
Mi = Mile
SR = State Route
R = Realignment
KERN COUNTY
1 Segment 1: I-5 PM R0.0 / 4.4
Los Angeles Co line / Ft Tejon OC
2 Segment 2: I-5 PM 4.4 / 10.2
Ft Tejon OC / Grapevine UC
3 Segment 3: I-5 PM 10.2 / R15.5
Grapevine UC / I-5 / SR 99 SEP
4 Segment 4: I-5 PM R15.5 / 33.5
I-5 / SR 99 SEP / SR 223 / I-5 SEP
5 Segment 5: I-5 PM 33.5 / 47.5
SR 223 / I-5 SEP / Stockdale Rd OC
6 Segment 6: I-5 PM 47.5 / 52.1
Stockdale Rd OC / I-5 / SR 58 SEP
7 Segment 7: I-5 PM 52.1 / 56.6
I-5 / SR 58 SEP / 7th Standard Rd
8 Segment 8: I-5 PM 56.6 / R73.0
7th Standard Rd / SR 46 / I-5 SEP
9 Segment 9: I-5 PM R73.0 / R87.0
SR 46 / I-5 SEP / Kings Co line
Kings COUNTY
10 Segment 10: I-5 PM R0.0 / 16.6
Kern Co line / I-5 / SR 41 SEP
11 Segment 11: I-5 PM 16.6 / 26.7
I-5 / SR 41 SEP / Fresno Co line
Fresno COUNTY
12 Segment 12: I-5 PM 0.0 / 14.9
Kings Co line / SR 198 / I-5 SEP
13 Segment 13: I-5 PM 14.9 / 30.0
SR 198 / I-5 SEP / N JCT SR 33 / I-5 SEP
14 Segment 14: I-5 PM 30.0 / 45.8
N JCT SR 33 / I-5 SEP / Manning Ave OC
15 Segment 15: I-5 PM 45.8 / 52.7
Manning Ave OC / Russell Ave OC
16 Segment 16: I-5 PM 52.7 / 66.2
Russell Ave OC / Merced Co line
13

F.8-425
cont.

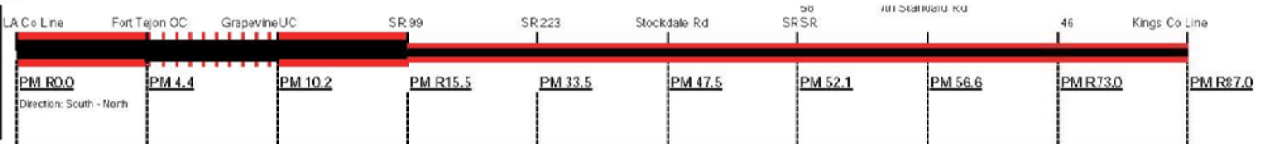
Transportation Concept Report

Interstate 5

SUMMARY CHART 1A

LEGEND

Existing Lanes
Planned or Programmed by 2035
Add Through Lanes Add Auxiliary Lanes
Freeway
Number of Lanes
4
8
* Length of segments not to scale



Segment: Is self-explanatory except for several data sets:

Rural/Urban: Indicates whether the segment is in a rural area or city limits.

Terrain: Shows the general highway grade: minimal grade = level; moderate grade = rolling; and severe grade = mountainous.

ROW: Portrays Right-of-Way (ROW) and geometric data in feet.

Shoulder Range: Is a range of treated surface (8' standard), both inside and outside shoulders.

Ultimate Transportation Corridor (UTC): Is the typical ROW needed for the ultimate facility,i.e., 8 lane freeway (8F) 216 feet is the standard typical UTC ROW - will be updated upon corridor plan lining by specific sections of highway.

Facility: Shows the Existing Facility, the desired facility type (2035 Concept) by 2035- RTPA's and Caltrans, and the Ultimate Facility to preserve ROW and plan line beyond 2035. 2C(I) indicates that the highway has been improved in select locations with operational or safety improvements.

LOS: The current (2011) LOS (level of service), along with the expected calculated LOS in 2020 and 2035. The 2035 Concept is the target LOS desired, i.e., LOS C, for attainment by 2035 Caltrans.

Deficiency: Occurs when the target LOS is degraded, i.e., LOS D worse than LOS C, with the year of occurrence shown. It also shows whether a capacity improving project is in the STIP, and what the LOS would be with the 2035 Concept improvement.

Directional Split: Denotes the split in the peak hour traffic flow on a directional basis (NB/SB or WB/EB) either in the morning (AM) or evening (PM).

AUX++ Auxiliary lanes are Truck Climbing lanes.

AADT: signifies Annual Average Daily Traffic.

Peak Hour: Indicates a representation of the maximum hour of traffic flow during the day.
99P Median is variable width greaters than 100 feet

N/A* - Deficient, no project recommended.

+ The Ultimate ROW is generally the same as the existing ROW

(-) Deficient with Improvement

* Concept Facility meets Concept LOS.

SEGMENT	1	2	3	4	5	6	7	8	9
County / Interstate	KERN / 5	KERN / 5	KERN / 5	KERN / 5	KERN / 5	KERN / 5	KERN / 5	KERN / 5	KERN / 5
Description Begin	LOS ANGELES CO LINE	FORT TEJON OC	GRAPEVINE UC	SR 99 SEP	SR 223 SEP	STOCKDALE RD OC	SR 58 SEP	7TH STANDARD RD	SR 46 SEP
Description End	FORT TEJON OC	GRAPEVINE UC	SR 99 SEP	SR 223 SEP	STOCKDALE RD OC	SR 58 SEP	7TH STANDARD RD	SR 46 SEP	KINGS CO LINE
Postmile Limits Begin/End (PM)	R0.0 / 4.4	4.4 / 10.2	10.2 / R15.5	R15.5 / 33.5	33.5 / 47.5	47.5 / 52.1	52.1 / 56.6	56.6 / R73.0	R73.0 / R87.0
Length (MI)	4.4	5.8	5.3	18.0	14.0	4.6	4.5	16.4	14.0
Rural / Urban	Rural	Rural	Rural	Rural	Rural	Rural	Rural	Rural	Rural
Terrain	Mountainous	Mountainous	Flat	Flat	Flat	Flat	Flat	Flat	Flat
ROW: Range Existing (FT)	214 / 340	218 / 400	208 / 230	208 / 208	208 / 230	208 / 208	208 / 208	208 / 208	208 / 208
Median Range (FT)	36 / 46	46 / 99P	36 / 99P	84 / 99P	79 / 84	79 / 84	74 / 84	79 / 84	84 / 84
Shoulder Range (FT) - Treated	8 / 10	8 / 10	8 / 10	5 / 10	5 / 10	5 / 10	5 / 10	5 / 10	5 / 10
Lane Width (FT)	12	12	12	12	12	12	12	12	12
Ultimate ROW (FT)	+	+	+	+	+	+	+	+	+
Facility: Existing	8F	6F+2AUX++	8F	4F	4F	4F	4F	4F	4F
2035 Concept	10F	6F+4AUX++	10F	6F	6F	6F	6F	6F	6F
UTC	10F	6F+4AUX++	10F	8F	8F	8F	8F	8F	8F
LOS: 2011	D	D	C	C	C	C	C	C	C
LOS: 2020	F	F	D	D	D	E	E	E	D
LOS: 2035	F	F	F	F	F	F	F	F	F
LOS: Concept 2035	C	C	C	C	C	C	C	C	C
Deficiency/Year Deficient	2010	2010	2020	2020	2020	2020	2020	2020	2020
Project in STIP/RTP (Y/N)	No	No	No	No	No	No	No	No	No
LOS W/ Concept Improvement	F(-)	F(-)	F(-)	N/A*	N/A*	N/A*	N/A*	N/A*	N/A*
Directional Split (Peak Hour)	70/30	70/30	52/48	56/46	52/48	60/40	65/35	54/46	53/47
AADT: 2011	75,000	75,000	81,000	41,000	33,000	33,000	33,500	34,000	31,500
AADT: 2020	107,000	107,000	115,500	58,500	47,100	49,900	50,600	49,600	46,500
AADT: 2035	166,600	166,600	179,900	91,100	73,300	83,600	84,800	79,600	75,700
Peak Hour: 2011	7,700	7,700	8,700	4,550	4,900	5,100	5,300	5,500	4,900
Peak Hour: 2020	10,980	10,980	12,410	6,490	6,990	7,710	8,010	8,020	7,230
Peak Hour: 2035	17,100	17,100	19,320	10,110	10,880	12,910	13,420	12,880	11,770
% Trucks: AADT	28%	28%	28%	29%	29%	31%	31%	31%	31%
% Trucks: Peak Hour	9%	9%	9%	14%	12%	11%	11%	11%	12%

F.8-425 cont.

ATTACHMENT D

GOOGLE EARTH IMAGE –
INTERSTATE 5 / VISTA DEL LAGO ROAD

F.8-426
cont.

Google Earth

feet 3000
meters 900

ATTACHMENT D
INTERSTATE 5 / VISTA DEL LAGO ROAD
(Note lack of road connections)

Responses to Comment Letter F.8
Center for Biological Diversity, Center for Food Safety, California Native Plant Society (Center for Biological Diversity, et al)
August 16, 2017

Response to Comment F.8-1:

The Commenter's opinion regarding the adequacy of the Draft EIR is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The Lead Agency disagrees with this comment's assertion that the EIR fails to comply with the requirements of the California Environmental Quality Act (CEQA). Please see responses to Comments F.8-5 through F.8-349.

Response to Comment F.8-2:

The comment is an introduction to the commenting organization. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-3:

The comment is an introduction to the commenting organization. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-4:

The comment is an introduction to the commenting organization. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-5:

The Commenter accurately quotes various legal opinions regarding the CEQA definition of the term "project" and the standards for an adequate EIR project description. These legal citations are noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. As this comment does not concern a significant environmental effect of the Project or the adequacy of the Draft EIR, no further response is required.

Response to Comment F.8-6:

The Commenter's legal citations regarding the standard for an adequate project description under CEQA are noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. As this comment does not concern a significant environmental effect of the Project or the adequacy of the Draft EIR, no further response is required.

Response to Comment F.8-7:

The Lead Agency disagrees with this comment's inaccurate assertion that the Draft EIR contains misleading statements regarding the project description. The administrative record is clear that the proposed Centennial Specific Plan has long been anticipated as a potential use of those portions of the West EOA controlled by the Project Applicant/Developer. As explained on page 4-9 of the Draft EIR, "[t]he Project Applicant/Developer's Project application was deemed complete on May 31, 2008; therefore, the potential implementation of the Project was known by the Los Angeles County Department of Regional Planning (LACDRP) and was accounted for in the development of the AVAP. As such, the potential benefits and impacts associated with the Project implementation[,] as reflected on the AVAP Land Use Policy Map, is considered within the AVAP and within the AVAP EIR's and are further considered in this EIR." This fact is confirmed by AVAP EIR, which explains that the Centennial Specific Plan was identified as a topic for analysis as early as that EIR's CEQA scoping meetings conducted on June 26, 2014 and July 7, 2014.[822] Although this EIR does not tier off of the AVAP EIR, the AVAP EIR nevertheless explains that it assumed development of the Centennial project, stating that "any future development projects within the Proposed Area Plan, *including Centennial*, may tier off the Program EIR for the Area Plan" (emphasis added).[823]

As discussed in response to Comment F.8-20, the Southern California Association of Governments (SCAG) is required by law to prepare a Regional Housing Needs Assessment (RHNA) based on regional growth projections and the County is in turn required to periodically update its General Plan to accommodate the County's fair share of the regional housing need by identifying sufficient land designated for residential use. SCAG's latest growth forecasts were adopted in 2016 and included forecasts at the regional, county, city, subregional, and TAZ levels.[824]

SCAG projects that, through 2040, the regional population will grow by 20 percent, resulting in a net increase of approximately four million additional residents. SCAG projects that the population of Antelope Valley will grow from 302,188 in 2020 to 784,310 in 2035.[825] The entire North Los Angeles County Subregion, which includes Antelope Valley and the Project site, will have 245,473 households by 2020 and 331,399 households by 2040, an increase of 85,926 households over 20 years.[826] The unincorporated portion of this subregion is projected to have 69,982 households in 2020 and 116,546 households in 2040. As explained in Draft EIR Section 5.9, Population and Housing, the County's housing element indicates that 30,145 new housing units are needed to meet future housing demand through 2021, a portion of which will be provided by the Project.

SCAG's growth projections also included a breakdown at the Traffic Analysis Zone (TAZ) level.[827] The Project site is located in portions of two TAZs and population projections for

822 DRP 2014a, p. 2-2
823 DRP 2014b, p. 2-97
824 DRP 2017, p. 5.9-4
825 *Id.,* p. 5.9-10
826 *Id.,* p. 5.9-16
827 *Id.,* p. 5.9-10

these TAZs are provided in Draft EIR Table 5.9-5, reprinted below. TAZ 20280000 includes the area north of SR-138 and east of I-5, while TAZ 20281000 includes the area south of SR-138.[828] As shown in Draft EIR Table 5.9-5, significant population growth is anticipated in TAZ 20280000, which covers the portion of the Project site north of SR-138. Specifically, SCAG projects that TAZ 20280000 will grow from 372 people in 2008 to 50,505 people by 2040, as shown in EIR Table 5.9-5.

The County adopted the AVAP in 2015 as a component of its General Plan in order to establish a comprehensive land use plan for accommodating projected growth in the planning area, as required by Government Code §65583. Indeed, the AVAP expressly states that it was prepared "[i]n anticipation of future growth" and is thus "focused on ways to manage this growth".[829] In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[830] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[831] This community vision is embodied in the AVAP's "Rural Preservation Strategy." At its core, the AVAP's Rural Preservation Strategy is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment".[832]

The AVAP's Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development".[833] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas (EOAs).[834] Per the AVAP, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[835] Rural Town Areas serve as transition areas between Rural Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[836] Rural Preserve Areas are located outside of Rural Town Centers and are largely undeveloped, unserved by existing or planned infrastructure and public facilities, and contain important environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[837]

The Project site is located entirely within the AVAP's West EOA.[838] Per the Rural Preservation Strategy, EOAs are defined clusters of land located along two new proposed major

828 *Id.,* Exhibit 5.9-1
829 DRP 2015, p. I-6
830 *Id.,* p. I-5
831 *Ibid.*
832 *Id.,* p. I-6
833 DRP 2015, p. I-7; DRP 2014a, p. 7-7
834 *Ibid.*
835 DRP 2015, p. I-7
836 *Ibid.*
837 *Ibid.*
838 DRP 2017, p. 4-4

infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[839] During the AVAP community planning process, EOAs "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to [EOAs] so that the areas around them can be preserved and maintained at low density, or agricultural uses".[840] Indeed, the very first policy described in the AVAP - Land Use Policy LU 1.1 – requires that the County "[d]irect the majority of the unincorporated Antelope Valley's future growth to … identified economic opportunity areas".[841] Accordingly, the AVAP Land Use Policy Map establishes land use designations for the Project site that correspond to the land use densities and intensities proposed by the Centennial Specific Plan, as shown on Exhibit 4-2a and as discussed in Section 5.8, Land Use, Entitlements, and Planning.[842] Moreover, as this comment correctly notes, the AVAP expressly states its expectation that the Project site will be developed as a "master-planned community" pursuant to a "specific plan."

As discussed above, it is AVAP's stated intent to establish a land use plan that will accommodate projected growth while also preserving the rural character of Antelope Valley. The AVAP is also clear that it intends to focus the majority of that new growth in designated EOAs, including the West EOA where the Project site is location. In addition, the AVAP Land Use Policy Map designates the Project site for new growth commensurate with the Centennial Specific Plan, which application was pending at the time of the AVAP was prepared and was evaluated in the AVAP EIR. Finally, the AVAP expressly states its expectation that the Project be developed as a master-planned community pursuant to a specific plan. Taken together, these facts make clear that AVAP "evidences an 'intent' for development of Centennial," despite this comment's claim to the contrary.

The Daft EIR makes no misleading statements regarding the West EOA's relationship to the Northwest 138 Corridor Improvement Project, a joint project recently approved by Caltrans and the Los Angeles County Metropolitan Transportation Authority that would widen and realign SR-138 to a limited access expressway in order to accommodate projected growth.[843] As the Draft EIR explains, that the AVAP designates the location of the West EOA due in part to its proximity to the Northwest 138 Corridor Improvement Project.[844] The Northwest 138 Corridor Improvement Project is an integral part of the AVAP's Rural Preservation Strategy, as discussed on AVAP page I-8:

> Economic opportunity areas are defined clusters of land along the routes of two new proposed major infrastructure projects in the Antelope Valley, namely the High Desert Corridor and the Northwest 138 Corridor Improvement Project. These areas were identified as having tremendous potential for economic growth and development. Thus, any development induced by these two infrastructure projects should be guided to these areas

839 DRP 2015, p. I-8
840 *Ibid.*
841 *Id.,* LU-3
842 DRP 2017, pp. 5.8-21 to -71
843 *Id.,* pp. 4-4, -9, -96; 5.8-21
844 *Id.,* pp. 4-4, -9; 5.5-7; 5.8-21, -34, -35, -68, -70

> so that the areas around them can be preserved an maintained at low density, or agricultural uses. This is intended to balance the growth and development which the two projects will undoubtedly bring, with the general intent of this Area Plan to preserve the ecological value and rural character of the Antelope Valley.

The Northwest 138 Corridor Improvement Project was also included in the SCAG RTP/SCS as part of the regional transportation projects needed to achieve the transportation, air quality, greenhouse gas, and economic development goals required by federal RTP laws and SB 375.[845] In light of these facts, there is no evidence to support this comment's claim that Draft EIR's project description is misleading with regards to the Project's relationship to the West EOA and the Northwest 138 Corridor Improvement Project.

The Final Environmental Impact Report/Environmental Impact Statement and Section 4(f) Evaluation for the Northwest 138 Corridor Improvement Project (SR-138 Project EIR) was certified on June 28, 2017 and is available for public review.[846] The author(s) of this comment letter filed comments on the draft SR-138 Project EIR which were addressed in the Final SR-138 Project EIR.[847] Although not specifically noted in this portion of the comment letter, the Commenter has filed a CEQA lawsuit challenging the AVAP generally, and targeting the Centennial project specifically. The Commenter lost this lawsuit in Superior Court, and recently filed an appeal.[848,849] The Commenter's objections to the AVAP generally, and the Centennial project within the West EOA specifically, are noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

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

California Department of Transportation (Caltrans). 2017a (June). EIR Certification and Findings: California Department of Transportation Findings For Northwest State Route 138 Corridor Improvement Project From Interstate 5 to State Route 14 In Los Angeles County. Los Angeles, CA: Caltrans. http://media.metro.net/projects_studies/nw138/images/feir-feis/nw138_eir_certification_fsoc.pdf.

California Department of Transportation (Caltrans). 2017b (June). Final Environmental Impact Report/Environmental Impact Statement and Section 4(F) Evaluation: Northwest State Route 138 Corridor Improvement Project. Los Angeles, CA: Caltrans.

845 SCAG 2016a Exhibit 5.4, p. 101

846 California Department of Transportation (Caltrans). 2017a (June). EIR Certification and Findings: California Department of Transportation Findings For Northwest State Route 138 Corridor Improvement Project From Interstate 5 to State Route 14 In Los Angeles County. Los Angeles, CA: Caltrans. http://media.metro.net/projects_studies/nw138/images/feir-feis/nw138_eir_certification_fsoc.pdf.

847 Caltrans 2017b, Appendix J, pp. 73-80

848 Ruling on Submitted Matter, *Ctr. For Biological Diversity v. Cnty. of Los Angeles*, No. BS156932 (L.A. Cnty. Sup. Ct. May 22, 2017) ("AVAP Ruling") at p. 21

849 Center for Biological Diversity (CBD). 2017. Appeal Challenges Massive Growth Plans for L.A. County's Antelope Valley. Los Angeles, CA: CBD. https://www.biologicaldiversity.org/news/press_releases/2017/antelope-valley-08-10-2017.php.

http://media.metro.net/projects_studies/nw138/images/feir-feis/nw138_feir-feis.pdf.

Center for Biological Diversity (CBD). 2017. Appeal Challenges Massive Growth Plans for L.A. County's Antelope Valley. Los Angeles, CA: CBD. https://www.biologicaldiversity.org/news/press_releases/2017/antelope-valley-08-10-2017.php.

Response to Comment F.8-7A:

This comment's citation to the AVAP is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. As this comment does not concern a significant environmental effect of the Project or the adequacy of the Draft EIR, no further response is required.

Response to Comment F.8-8:

The Draft EIR includes an appropriate calculation and analysis of the potential residential population of the Project, based on an average household size within the Project, which varies by residential product type. For example, a larger single-family home in either the Very Low Density Residential (VLDR), Low Density Residential (LDR), or Medium Density Residential (MDR) designation, is assumed to be occupied by more people and thus generate more traffic trips and consume more water.[850] The population generation rates assume 3.17 residents per single-family detached unit.[851] Conversely, smaller, multi-family units in the High Density Residential (HDR) or Very High Density Residential (VHDR) designation are assumed to be occupied by fewer people and thus generate fewer traffic trips and consume less water.[852] The population generation rate assumes 2.38 residents per single-family attached and multi-family units.[853] The Draft EIR therefore uses an estimate of approximately 57,150 maximum residents at Project buildout, which is estimated to occur in 2035.[854] This is in fact a conservative estimate, because the number of dwelling units constructed in each planning area are not likely going to be at maximum densities for every area, but would vary within the density range throughout the Project.[855] Similarly, household sizes may differ from the averages used, and the resulting residential population would likely be less than the 57,150 people assumed as a Project maximum.

The Project's consideration of so-called "ADUs" is also appropriate and consistent with CEQA requirements. As explained in the Centennial Specific Plan, a second unit or accessory dwelling unit (ADU) is "an additional dwelling unit accessory to a primary dwelling unit, sometimes called a granny flat, located on the same lot as a residence that does not require subdivision. It may have kitchen facilities and be rented without age restrictions, but not

850 DRP 2017, Appendix E of Appendix 5.10-A, Table E-1; *Id.,* Appendix 5.18-A, Table 2.1.2; *Id.,* Appendix 5.19-A, p. 3-2
851 *Id.,* Appendix 5.10-A, p. 2-14
852 *Ibid.*
853 *Id.,* Appendix 4.0-A, p. 2-14
854 *Id.,* p. 5.9-1
855 *Ibid.*

sold."[856] Under the Specific Plan, ADUs are not an additional unit, but rather are a reconfiguration of a single-family home. Consistent with the above-described average household sizes which inform the Draft EIR analysis, ADUs are permitted in the higher occupancy VLDR, LDR, and MDR designations (which would allow a reconfiguration of approximately 16,978 homes to include an ADU), and not permitted in the lower occupancy HDR or VHDR designations.[857] ADUs were therefore properly accounted for in Project residential population assumptions. As noted in the Draft EIR at page 4-19, whether any given single-family home is occupied by a large family, or is an "empty nest" occupied by only one or two adults, and whether the home has only one primary income earner or three income earners (e.g., a young adult or an adult resident of an ADU), is both speculative and irrelevant to the data-based estimates described above. Further, regardless of the actual makeup of a family in a single-family home, development must be consistent with the development standards for each applicable land use designation. Project population estimates have appropriately been prepared by experts under County supervision, including with regard to estimated household size and the associated environmental impacts of different types of dwelling units and configurations that include ADUs in permissible land use designations. In any case, under no circumstances may the Project exceed the maximum number of building units, which is 19,333, without further CEQA review.[858] If any dwelling units are proposed over the maximum allowable number as described in Draft EIR Section 4.0, Project Description, the County would need to consider an amendment to the adopted Specific Plan, and the amendment would legally be subject to the requisite CEQA review.

The development of ADUs has long been encouraged by state law, and as discussed further in *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437 ("S*ave Round Valley*"), CEQA does not compel a project description that assumes the development of any or a particular number of ADUs. As the Fourth District Court of Appeal explained in *Save Round Valley*, whether applicable lot owners will seek permission to build ADUs in permissible land use designations "depends initially upon the desires of future lot owners, who are unknown," and "there is no factual basis for believing that a future land owner is likely to do so. Any conclusions about their intentions to build second units would therefore be speculation."[859] As such, "even if the building of some second units might be foreseeable, it is impossible to predict how many units will be built, the size of such units, on which lots they might be built, their location within a lot, the visibility of a second unit from outside the subdivision, or how such units might impact the environment."[860] Therefore, rather than rely on speculation, the Project Draft EIR relied on peer-reviewed and County-reviewed methodology to prepare a data-based, conservative residential population assumption. Consistent with CEQA requirements, the Project Draft EIR has appropriately considered the impact of residential components of the Project, including with regard to the reconfiguration of a qualifying single-family unit to provide for an ADU.

856 *Id.,* Appendix 1-A of Appendix 4.0-A, p. 8
857 *Id.,* Appendix 4.0-A, Table 2-16, p. 2-46
858 *Id.,* p. 4-19
859 *Save Round Valley,* at 1450
860 *Ibid.*

Response to Comment F.8-9:

The use of ADU development rates in neighboring communities to create an estimate for the Project would be speculative, is irrelevant to the Project and Draft EIR analysis, and is not required under CEQA. Please see response to Comment F.8-8 for further discussion of ADUs and the Draft EIR's appropriate consideration of the anticipated Project residential population. With regard to on-site employment counts, and the related impact analyses including with regard to traffic, the Draft EIR relies on established, technical methodologies that have been peer reviewed by experts (see, e.g., letter submitted by Caltrans indicating concurrence with the methodology used in the Centennial Traffic Study, at Draft EIR Appendix 5.10-B) and reviewed by the County, including for example the employee assumptions associated with different categories of land use, such as retail and commercial. The methodologies are discussed, for example, in both Draft EIR Section 5.9, *Population, Housing, and Employment*, and the Centennial Specific Plan Traffic Study included as Draft EIR Appendix 5.10-A.

As discussed in more detail in response to Comment F.8-23, Draft EIR page 5.10-91 explains that the traffic analysis assumes that a portion of the Project workforce and resident population will live or work outside the Project area and will commute to jobs outside or within the Centennial Specific Plan area. The analysis also assumes that on-site residents and workers will travel for services and amenities outside of the Project. The porportion of internal and external Project area trips was derived from the North County Sub-area Traffic Model updated by Los Angeles County to reflect the Antelope Valley Area Plan approved by the County in June 2015. The North County Sub-area Traffic Model used for the Project analysis is the same model used by the County and other public agencies for transportation planning studies in the region, including the 2015 Antelope Valley Area Plan (AVAP) and County General Plan update EIRs. The model was also used by Caltrans in the preparation of the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS.

As discussed on pages 5.10-49 to 5.10-51 of the Draft EIR, the Project analysis includes a discussion of internal and external "tripends" and "trips." A "trip end" refers to a trip start or destination point. An internal tripend is a trip that starts or begins in the Project site, such as from a residence. A "trip" includes a starting tripend and ending tripend. An internal trip is a trip that both starts and ends within the Project site. An external trip is a trip with either a starting or ending point outside of the Project site. As discussed on Draft EIR pages 5.10-2 to 5.10-5, the Draft EIR uses the most recent version of the North County Sub-Area Model to evaluate traffic conditions in north Los Angeles County, including the Project site. This version of the model was updated by Los Angeles County to reflect the Antelope Valley Area Plan (AVAP) approved by the County in June 2015. Notably, no party, including the Commenter, challenged the AVAP EIR's traffic analysis within the applicable statute of limitations, and therefore the AVAP EIR's traffic analysis is now "conclusively presumed to comply" with CEQA.[861] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the EIR's traffic analysis (Petition for Writ of Mandate, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. BS156932 (L.A. Cty. Sup. Ct.

[861] CEQA Guidelines § 21167.2

July 16, 2015); Petitioner's Opening Brief, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Statement of Issues, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Reply Brief, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 (L.A. Cty. Sup. Ct. Jan. 18, 2017). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[862]

The updated North County Sub-Area Model used in the AVAP EIR affirmed by the Superior Court provides the estimates of Project internal trips and tripends utilized in the Draft EIR. As shown in Table 5.10-19 of the Draft EIR, the model projects that about 48 percent of the Project's total average daily trips (ADT) at buildout will be internal, and 52 percent will be external to the Project site. The model also projects that about 65 percent of the Project's full buildout total average daily tripends (the start or ending of a trip) will be internal to the site, and 35 percent will be external to the site. The proportion of trips and tripends that are projected to be internal and external to the Project site by the North County Sub-Area Model are based on model parameters such as population, employment and the relative distances between areas for which Project trips will be made. As discussed on Draft EIR page 5.10-50 the Project includes schools, parks, and retail shopping areas within the Project site located and sized to meet the Project's residential and workforce needs. As discussed in more detail in response to Comment F.8-23, the model results for the Project's proportion of internal and external trips and tripends are consistent with available applicable traffic models for the Lancaster/Palmdale and Santa Clarita Valley areas and available information regarding internal, external and travel time to work from the 2011-2015 ACS 5-Year Estimates for 11 communities that with similar geographic characteristics and a comparable average workforce as the Project. The Lead Agency is entitled to rely on expert traffic model estimates as substantial evidence of a project's likely traffic impacts, including the air emissions associated with such traffic trips.[863] The comment does not question the accuracy of the North County Sub-Area Traffic Model, or provide evidence that the model is unreliable. Consequently, the North County Sub-Area Model used in the Draft EIR provides the best available information concerning the projected onsite population that would reside in the Project area and the onsite and offsite transit activity associated with the Project.

Draft EIR Section 5.9, Population, Housing, and Employment also analyzes historical and projected employment growth for the region contained in SCAG's 2012-2035 RTP/SCS, 2016-2040 RTP/SCS, and the AVAP, including for the entire SCAG region, Los Angeles County, the North Los Angeles County Subregion, the Antelope Valley, and the Project site specifically.[864] The section includes an anticipated number of permanent jobs that would be created by the Project, which is 23,675, and analyzes the relationship between this number and the above-described projections for the region and the Project site specifically,

862 Ruling on Submitted Matter, Ctr. For Biol. Diversity v. Cty. of Los Angeles, No. BS156932 (L.A. Cty. Sup. Ct. May 22, 2017), at p. 13

863 *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal* (1988) 47 Cal.3d 376, 410; *National Parks & Conserv. Ass'n v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1362

864 DRP 2017, pp. 5.9-18 to -21

concluding that no conflict would occur with regard to employment.[865] Rather, the Project would help to improve the region's jobs-housing ratio.[866] As is the case with the traffic analysis, the Draft EIR does not conclude that all such jobs *will* be filled by Project residents or provide an estimated number of jobs that would be filled by Project residents, but does appropriately evaluate the potential impact of creating 23,675 permanent jobs in a mixed use, Specific Plan setting.

Response to Comment F.8-10:

The Draft EIR clearly states that the Open Space designation allows for continued grazing, and refers the reader to Draft EIR Appendix 4.0-A.[867] Grazing would include temporary and long-term activities, possibly in perpetuity if determined necessary to maintain grassland values based on the Ranch-wide Management Plan (RWMP) (refer to MM 7-10).[868] The grazing timing and intensity within open space areas will be determined by the Project Biologist as a grassland management tool, if appropriate, for the potential benefit of native grasslands. Through implementation of MM 7-10, if managed cattle grazing is shown to adequately retain grassland resources, managed cattle grazing in portions of the Mitigation Preserve would continue to be utilized.

Response to Comment F.8-11:

This comment concerns potential future development that may substantially deviate from the balanced development described in the Draft EIR. The comment does not include relevant portions of the phasing discussion referenced on Draft EIR page 4-91, which state that although the phasing program may be revised by the Project Applicant/Developer, any such revision is subject to County approval during the tentative tract map (TTM) process required by the Los Angeles County Subdivision Ordinance and the development requirements in the Centennial Specific Plan.[869]

The Draft EIR discusses the Project Description in Section 4.0 and complies with all applicable requirements of the CEQA Guidelines. As discussed on page 4-1 of the Draft EIR, Section 15124 of the California Environmental Quality Act (CEQA) Guidelines (California Code of Regulations [CCR], Title 14) requires that an environmental impact report's (EIR's) project description contain (1) the precise location and boundaries of a proposed project; (2) a statement of objectives sought by the proposed project including the underlying purpose of the project; (3) a general description of the project's technical, economic, and environmental characteristics; and (4) a statement briefly describing the intended uses of the EIR, including a list of the agencies that are expected to use the EIR in their decision making, a list of the permits and other approvals required to implement the project, and a list of related environmental review and consultation requirements required by federal, State, or local laws, regulations, or policies. An adequate project description need not be exhaustive, but should supply the detail necessary for project evaluation. An EIR is the most

865 *Id.,* pp. 5.9-29 and -30
866 *Id.,* pp. 5.9-30 and -31
867 *Id.,* pp. 3-18, 4-24
868 *Id.,* p. 5.7-180
869 Final EIR Appendix 4.0-A.Rev

comprehensive form of environmental documentation identified in CEQA and the CEQA Guidelines. The Project Description in Draft EIR Section 4.0 provides the information needed to assess the environmental effects associated with the planning, construction, and operation of the Project. The mitigation measures for the Centennial Project are listed in the Mitigation Monitoring and Reporting Program (MMRP).[870]

The Draft EIR includes a Conceptual Phasing Plan implemented over a 20-year period.[871] As summarized in Draft EIR Table 4-1, Centennial Project Overview, and on Draft EIR page 4-6, at full buildout the Project would include approximately 12,323 acres and would allow up to 19,333 dwelling units (du) on approximately 4,987 gross acres of land designated for residential uses. Other land uses include approximately 7,363,818 square feet (sf) of Business Park uses (office, research and development, and warehousing or light manufacturing uses) on approximately 597 gross acres; and approximately 1,034,550 sf of Commercial uses on approximately 102 acres. Proposed Institutional/Civic land uses (such as schools for higher education, medical facilities, library, and other civic uses) encompass approximately 1,568,160 sf on approximately 110 acres. The Project includes approximately 130,680 sf of Recreation/Entertainment uses (clubhouse, farmers market, childcare facilities, health clubs) on approximately 75 acres. Proposed sites for major utility facilities that would serve the entire community (e.g., wastewater reclamation facilities, water treatment facility, water bank, materials recovery facility) encompass approximately 191 acres, and Kindergarten through 12th grade (K-12 schools would be located on approximately 145 acres. Approximately 5,624 acres (approximately 45.6 percent) of the 12,323-acre Project site are proposed for Open Space for natural resource protection and greenways, and parks for active and passive recreational use.

Development within the Project site will require the preparation and implementation of TTMs for each phase and component of the Project. As discussed on Draft EIR page 4-92, the TTMs serve as the implementing mechanisms for Project land uses, and all TTM land uses must be consistent with the Centennial Specific Plan.[872] Chapter 4 of the Specific Plan describes the processes and procedures for implementing the Specific Plan, including the processes and procedures for subsequent Project approvals such as future TTMs. Chapter 4 of the Specific Plan also establishes mechanisms that allow for flexibility in the development of the Project to respond to market conditions over the anticipated buildout of the Project while ensuring consistency with the purpose and intent of the Specific Plan. Specific Plan Section 4.5.2, Discretionary Conformance Review, provides that significant modifications of the Specific Plan, including land use adjustments under Specific Plan Section 4.6, (Specific Plan Adjustment, Transfer, and Conversion Regulations) are subject to discretionary review and approval, including additional CEQA analysis as applicable.[873]

Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan.

870 *Id.,* Appendix 2.0-C.Rev
871 DRP 2017, Exhibit 4-20; pp. 4-91 and -92
872 Final EIR Appendix 4.0-A.Rev
873 DRP 2017, Appendix 4.0-A, p. 4-8

Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to the Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code. As discussed in the California Bureau of Real Estate Reference Guide, the California Subdivision Map Act[874] sets forth the conditions for approval of subdivision maps and requires enactment of subdivision ordinances by which local governments have direct control over the types of subdivision projects to be undertaken and the physical improvements to be installed. The primary objectives of the Act include the coordination of subdivision design (lots, street patterns, rights-of-way for drainage and sewers, etc.) with applicable plans and insuring that public improvements are properly completed to avoid undue burdens on the taxpayers of the community.[875] The Los Angeles County Subdivision Ordinance was enacted in accordance with state law, and the approval of each future TTM for the Project must ensure compliance with the Specific Plan and that public facilities, including transportation improvements that meet Project demand under forecasted cumulative conditions, are implemented without resulting in undue burdens to County and other taxpayers.

The MMRP requires that Project traffic conditions and impacts be analyzed in conjunction with each TTM application. MM 10-2, for example, requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County. MMs 10-25 and 10-26[876] require that the Project Applicant confirm that all Specific Plan traffic-related requirements, including the creating and operation of a Transportation Management Agency, the implementation of facilities and measures that encourage non-automotive transportation, and the implementation of Transportation Demand Management measures, prior to County approval of a TTM. Consequently, Project and local traffic conditions and the need for the implementation of applicable mitigation measures in the MMRP that identify improvements to local and state highway facilities will be evaluated as the Project is developed and TTMs are submitted for County review and approval. If the Project traffic evaluated in a TTM application deviates significantly from projected levels, the County has the authority deny the approval of any new TTMs and additional development until Project conditions are verified to be within projected levels, or a new project application, with new CEQA analysis, is reviewed and approved.

As discussed on Draft EIR pages 4-91 to 4-92, while the development of specific future phases and components of the Project will be based on the state of the economy, market demand for uses on the site and the timing of regional and off-site infrastructure, the Project land use approval process required by the Specific Plan, the implementation of the Subdivision Map Act by the County, and the MMRP ensure that future development will occur in a balanced pattern. As discussed above, Project development may only proceed after County approval of future TTMs. The TTM review and approval process requires an

874 Government Code § 66410, et seq.

875 California Bureau of Real Estate Reference Guide, Chapter 17, Subdivisions and Other Controls, available at http://www.dre.ca.gov/Publications/ReferenceBook.html.

876 Final EIR Appendix 2.0-C.Rev

environmental evaluation to confirm that the Project's interim buildout (including the interim buildout of different categories of uses) does not cause any new or more significant adverse environmental impacts that were not evaluated in the Draft EIR. The MMRP specifically requires that traffic studies be prepared and that Specific Plan transportation measures be confirmed in conjunction with each TTM application. In the event that, as the comment suggests, the Project's residential development substantially outpaces the proposed onsite employment or commercial land uses, the environmental and traffic analysis required for each TTM would find that Project-related traffic differs from the traffic volumes and patterns considered in the Draft EIR. If these differences are found to generate new or more severe significant impacts, a subsequent EIR, additional public and agency review, and future feasible mitigation to avoid or reduce Project traffic-related impacts under the conditions documented during the TTM review and approval process would be required before any additional development is approved.

At that time, a subsequent EIR, additional public and agency review, and future feasible mitigation to avoid or reduce Project traffic-related impacts under the conditions documented during the TTM review and approval process would be required before any additional development is approved.

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

In summary, the Project Description provided in the Draft EIR meets all applicable CEQA requirements and provides sufficient information to analyze potential impacts. Future development will be implemented in accordance with the Specific Plan and the review and approval of TTMs for the site. The extent to which the balanced development required by the Specific Plan and discussed in the Draft EIR is being achieved over time, including environmental and traffic impacts, will be evaluated during the TTM review and approval process. If Project development does not occur as projected, a subsequent EIR, additional public and agency review, and future feasible mitigation to avoid or reduce Project traffic-related impacts under the conditions documented during the TTM review and approval process would be required before any additional development is approved. As a result, the Project cannot generate long-term development that substantially deviates from the

balanced development and associated interim and long-term traffic patterns described in the Draft EIR.

Response to Comment F.8-12:

The Commenter's opinion that the absence of specificity in project phasing renders the project description inadequate under CEQA is noted for the record, and this comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration. As discussed above in response to Comment F.8-11, information provided in the Draft EIR meets all applicable CEQA requirements and provides sufficient information to analyze potential impacts. The cases cited in the comment are inapposite to the Project and the Draft EIR. The Draft EIR significantly differs from the relevant factors considered by the courts in the cited cases, does not suffer from the shortcomings discussed in the vases, and is consistent with CEQA requirements. Each case cited in the comment concerns an environmental impact report (EIR) that did not describe or analyze clearly foreseeable project components or provided descriptions and analyses that were found to be so inconsistent that the Draft EIR was inadequate as an informational document.

In *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1450-51 ("*Santee*") the County of San Diego certified a Final EIR in which the project description described a "temporary" or "interim" project to expand a detention facility in Santee, but failed to specify any estimated timeframe for the project in the EIR.[877] The EIR's traffic analysis was "based on measuring the interim or temporary project at three years," but after preparation of the EIR, the lead agency stated a defined time period of *seven* years for the project.[878] At the same time, however, the lead agency also noted that it was the agency's intent to keep the detention facility remaining open into the foreseeable future if permanent replacement facilities could not be built and begin operating in the desired timeframe.[879] Under these circumstances, the *Santee* court held that the project description in the EIR was inadequate.[880] The *Santee* EIR defined as "temporary" a project that was in fact potentially indefinite, and as a result the EIR failed to analyze the reasonably foreseeable future use of the facility.[881]

Unlike the EIR in *Santee*, the Project Description and the Draft EIR accurately state that the Project involves permanent development that will operate into the foreseeable future. The Draft EIR properly examines the Project's full buildout impacts during both an estimated 20-year buildout period and during future operations. Future development will be implemented in accordance with the Specific Plan and the review and approval of tentative tract maps (TTMs) for the site. The extent to which the balanced development required by the Specific Plan and discussed in the Draft EIR is being achieved over time, including environmental and traffic impacts, will be evaluated as required by the Mitigation Monitoring and Reporting Program (MMRP)[882] the during the TTM review and approval process. If Project

877 *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1450-51 ("*Santee*")
878 *Id.,* at 1451
879 *Id.,* at 1451, 1454
880 *Ibid.*
881 *Id.,* at 1454
882 Final EIR Appendix 2.0-C.Rev

development does not occur as projected, a subsequent EIR, additional public and agency review, and future feasible mitigation to avoid or reduce Project traffic-related impacts under the conditions documented during the TTM review and approval process would be required before any additional development is approved. As a result, the Project cannot generate long-term development that substantially deviates from the balanced development and associated interim and long-term traffic patterns described in the Draft EIR as suggested in the comment. The comment provides no support for the claim that unbalanced development (e.g., solely residential development) could reasonably occur under the applicable land use approval process, the MMRP requirements for the Project, and the extreme outcome referenced in the comment is highly unlikely and purely speculative.

In *San Joaquin Raptor Rescue Center v. County of Merced* (2010) 149 Cal.App.4th 645, 655 ("*San Joaquin Raptor*"), the Court of Appeal concluded that the County of Merced's EIR for the expansion of an existing aggregate mining operation fundamentally misinformed readers regarding the mine's future operations: "[the EIR] indicates, on the one hand, that no increases in mine production are being sought, while on the other hand, it provides for substantial increases in mine production if the Project is approved." The expansion project allowed an increase in available mining acreage from 90 to 304 acres, which would result in an additional 30 years of operation, but the EIR concluded that the expansion "is not proposed to substantially increase daily or annual production."[883] The EIR said that the project would provide for an average production of 260,000 tons per year, and a maximum production level of 500,000 tons per year, whereas the average production rate over the four previous years had been 240,000 tons per year, and the highest production rate *ever* recorded was 312,890 tons per year in 1999.[884] The project also revised project hours of operation to allow for batch plant and loadout nighttime operations, which could periodically be "24-hours per day, and up to seven days per week for limited periods…" with unspecified durations that would depend on the needs of projects requiring the mine's materials at night.[885] The court concluded that the EIR was inadequate and fundamentally misleading, because it gave conflicting information about the nature and scope of the activity being proposed by emphasizing that it would not substantially increase production, despite the potential 24-hour per day operation for undefined periods and the new maximum production of 500,000 tons per year, which made the EIR's assumed average 260,000 ton per year baseline for analysis very unlikely.[886] Perhaps most importantly, as in *Santee*, it was "clear that this curtailed or shifting project description affected the EIR process" – the EIR's analysis explicitly assumed production of 260,000 tons per year analysis, which very likely understated the true volume.[887]

By comparison, the Project Draft EIR fully and consistently defines the scope of development, which is a maximum of 19,333 dwelling units, approximately 7,363,818 square feet of Business Park uses, 1,034,550 square feet of Commercial uses, 1,568,160 square feet of Institutional/Civic uses, 130,680 of Recreation/Entertainment uses, and 5,624 acres of Open

883 *San Joaquin Raptor Rescue Center v. County of Merced* (2010) 149 Cal.App.4th 650 ("*San Joaquin Raptor*")
884 *Ibid.*
885 *Id.,* at 651-652
886 *Id.,* at 655-657
887 *Id.,* at 657

Space.[888] The Draft EIR includes proposed infrastructure and service use locations, and sufficiently describes the process for future Tract Map approval for Project refinement. The Draft EIR also fully analyzes Project impacts, both during the approximately 20 years of buildout and during foreseeable future operations. The Draft EIR does not make, and the comment does not provide a citation to any inconsistent statement about the term or intended scope of the development in any way comparable with the findings in *San Joaquin Raptor.*

In *Communities for a Better Environment v. City of Richmond* ("*CBE*") (2010) 184 Cal. App. 4th 70, 76-77, 81-12, an EIR for increased and altered production at a Chevron refinery in Richmond acknowledged that "upgrades would expand the Refinery's options for using a wider range of crude oils." At the same time, the EIR stated that the project would not increase the refinery's ability to process heavier, lower quality crude and did not include any analysis of public health or other impacts related to processing heavier crude. Chevron's, however, filed conflicting information with the federal Securities and Exchange Commission which indicated that the central purpose of the project was to process heavier crude.[889] Further, the EIR contained conflicting statements about project objectives, indicating in different parts that the project "does not include any process and equipment changes that would facilitate the processing of heavier crudes at the Chevron Richmond Refinery," while also explaining that refiners have had to adapt to crude oil supply that is increasingly heavier and the project was being proposed in the context of those changes in crude oil supply.[890] The court concluded that the EIR was inappropriately vague and obscure because it did not appropriately explain its conclusion that the future crude processed would be "similar to that which is currently processed," especially given the conflicting information in the Draft EIR and other parts of the record.[891]

By contrast, the Project Draft EIR consistently and completely describes the proposed Project and fully analyzes foreseeable impacts during approximately 20 years of buildout and during foreseeable future operations. Further, the Specific Plan[892] and Draft EIR provide detailed information about the construction equipment anticipated to be required, proposed conceptual Project features including circulation, land use mix, open space, proposed infrastructure and service needs, and feasible mitigation to reduce Project impacts. The Draft EIR and Specific Plan do not make conflicting representations regarding the scope, impact of or any other aspect of the Project and do not obscure the Project's purpose and planned development components. The comment does not provide a cite to any statement made by the lead agency, Project Applicant or in any other source that is in any way inconsistent with the Draft EIR Project Description as discussed in *CBE.*

The Project Draft EIR provides detailed information about and analyzes the impacts of all proposed phases of development and Project operation, and also discloses that the precise Project buildout would be based on future market conditions, over an approximate 20-year

888 DRP 2017, page 4-6
889 *Communities for a Better Environment v. City of Richmond* ("*CBE*") (2010) 184 Cal. App. 4th 84
890 *Id.,* at 83
891 *Id.,* at 85, 89
892 Final EIR Appendix 4,0-A.Rev

period through a series of future subdivision maps.[893] This approach is fully consistent with CEQA requirements. The First District Court of Appeal, in *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal. App. 4th 1036 ("*CSTI*") held that a project description may provide the flexibility needed to respond to conditions and events that could affect its final design, provided the description contains information sufficient to evaluate and review the project's environmental impacts. In *CSTI*, the appellant contended that the City and County of San Francisco failed to certify a legally adequate EIR for the Treasure Island/Yerba Buena Island Project, a comprehensive plan to redevelop a former naval station on Treasure Island and Yerba Buena Island in the middle of the San Francisco Bay, into a large mixed-use community.[894] The EIR described the mixed-use community as including up to 8,000 residential units, 140,000 square feet of new commercial and retail space, up to 100,000 square feet of new office space, restoration and reuse of historic building on Treasure Island, approximately 500 hotel rooms, public utilities, 300 acres of parks, playground, and public open space, bicycle and transit facilities, and a new ferry terminal and intermodal transit hub.[895] The EIR indicated that construction and buildout of the project would be phased, and was anticipated to be completed over an approximately 15- to 20-year period.[896] The EIR included a conceptual description of each proposed phase, but explained that as the project was implemented over time, "the phasing could be adjusted for economic or constructability reasons," and such adjustments could "affect the number, order, and timing of phases."[897]

CSTI challenged the certification of the EIR, arguing that "at best, the EIR constitutes conceptual, program-level CEQA analysis", and was therefore insufficient as a project-level environmental document.[898] The court upheld the EIR, explaining that "the EIR made an extensive effort to provide meaningful information about the project, while providing for flexibility needed to respond to changing conditions and unforeseen events that could possibly impact the Project's design" and noting that "the basic characteristics of the Project under consideration in this case remained accurate, stable, and finite throughout the EIR process."[899] The *CTSI* court specifically rejected the arguments of the appellants in that case – which is also raised in the comment – that an EIR project description must "anticipate every permutation or analyze every possibility" and found that "[C]ourts [have not] required resolution of all hypothetical details prior to approval of an EIR, as CSTI implies."[900]

Consistent with *CSTI*, the Draft EIR includes a description of and an exhibit depicting the conceptual phasing plan, but fully discloses that market conditions may affect development timing and phasing, and development of the Project site can be expected to extend over a 20-year time frame.[901] The characteristics of the Project are described consistently, accurately,

893 DRP 2017, page 4-6
894 *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal. App. 4th 1044 ("*CSTI*")
895 *Ibid.*
896 *Ibid.*
897 Treasure Island/Yerba Buena Island Redevelopment Project Final EIR, pages II.79 through II.82
898 *CSTI,* at 1047
899 *Id.,* at 1053, 1055
900 *CTSI,* at 1054 [citing *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 909–910 and *City of Antioch v. City Council* (1986) 187 Cal.App.3d 1325, 1336–1337]
901 DRP 2017, pp. 4-91 and -92; *Id.,* Exhibit 4-20

and finitely throughout the Draft EIR and in the Specific Plan. The comment provides no support for the claim that unbalanced development (e.g., solely residential development) could reasonably occur under the applicable land use approval process, the MMRP requirements for the Project, and the extreme outcome referenced in the comment is highly unlikely and purely speculative. The Draft EIR is consistent with CEQA requirements and does not fail to inform decision-makers and the public of the true scope of the Project from which all interested parties could assess the direct and indirect environmental effects of the Project as asserted in the comment.

The opinions raised in the comment regarding the Project Description are also similar to those considered and rejected by the Court of Appeal in *Dry Creek Citizens Coal. v. Cty. of Tulare* (1999) 70 Cal. App. 4th 20, 27 (*"Dry Creek*"). In *Dry Creek,* petitioners challenged an EIR for a proposed expansion of a surface mining operation by arguing that the EIR's project description provided only a conceptual description of the bypass channel, cutoff walls, and in-stream diversion structures that would be used in the operation. As the *Dry Creek* court noted:

> [CEQA Guidelines § 15124(c)] requires a "general description" of the project's technical characteristics. "General" means involving only the main features of something rather than details or particulars. The "general description" requirement for the technical attributes of a project is consistent with other CEQA mandates to make the EIR a user-friendly document. For example, Guidelines section 15140 states the EIR's must be written in plain language so that decisionmakers and the public can rapidly understand them. The general description requirement also fosters the principle that EIRs should be prepared early enough in the planning stages of a project to enable environmental concerns to influence the project's design. A general description of a project element can be provided earlier in the process than a detailed engineering plan and is more amendable to modification to reflect environmental concerns.
>
> (*Dry Creek,* at 28)

The *Dry Creek* court affirmed the adequacy of the EIR project description, despite the use of conceptual descriptions of certain elements, and specifically held that the fact that the project "defers approval of final designs . . . until after project approval" did not violate CEQA.[902] As the *Dry Creek* court noted, "[c]ourts should not interpret CEQA to impose procedural or substantive requirements beyond those explicitly required in the statutes or CEQA Guidelines, and CEQA does not mandate the detail appellants urge this court to require."[903]

In May 2017, the Los Angeles Superior Court affirmed the validity of the Antelope Valley Area Plan EIR against a lawsuit by the Commenter. Similar to the Project Draft EIR, the AVAP EIR provided a project description that identified the attributes of the full buildout of the plan,

[902] *Dry Creek,* at 34
[903] *Id.,* at 36 [citing CEQA § 21083.1]

but also provided for flexibility in the development of specific phases of future development.[904] In upholding the AVAP EIR, and specifically affirming the adequacy of the AVAP EIR's Project Description, the Superior Court noted, citing *County of Inyo v. City of Los Angeles* (1977) 71 Cal. App. 3d 185, 199, that "[t]he CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project."[905]

Consistent with *Dry Creek* and the Court's ruling in favor of the AVAP EIR, the Draft EIR Project's Description is accurate, stable, finite, and complies with CEQA in all respects.

Response to Comment F.8-13:

The Commenter's opinion that the absence of specificity in project phasing renders the Draft EIR analysis of traffic, greenhouse gas (GHG) and air pollution unreliable is noted for the record, and this comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

With respect to phasing, as discussed in responses to Comments F.8-11 and F.8-12, the Draft EIR Project Description in Section 4.0 complies with all applicable requirements of the CEQA Guidelines. Consistent with Section 15124 of the California Environmental Quality Act (CEQA) Guidelines,[906] the Project Description includes (1) the precise location and boundaries of a proposed project; (2) a statement of objectives sought by the proposed project including the underlying purpose of the project; (3) a general description of the project's technical, economic, and environmental characteristics; and (4) a statement briefly describing the intended uses of the EIR, including a list of the agencies that are expected to use the EIR in their decision making, a list of the permits and other approvals required to implement the project, and a list of related environmental review and consultation requirements required by federal, State, or local laws, regulations, or policies. An adequate project description need not be exhaustive, but should supply the detail necessary for project evaluation. An EIR is the most comprehensive form of environmental documentation identified in CEQA and the CEQA Guidelines. The Project Description in Draft EIR Section 4.0 provides the information needed to assess the environmental effects associated with the planning, construction, and operation of the Project. The mitigation measures for the Centennial Project are listed in the Mitigation Monitoring and Reporting Program (MMRP).[907]

The Draft EIR includes a Conceptual Phasing Plan implemented over a 20-year period.[908] As summarized in Draft EIR Table 4-1, Centennial Project Overview, and on Draft EIR page 4-6, at full buildout the Project would include approximately 12,323 acres and would allow up to 19,333 dwelling units (du) on approximately 4,987 gross acres of land designated for residential uses. Other land uses include approximately 7,363,818 square feet (sf) of Business Park uses (office, research and development, and warehousing or light

904 Ruling on Submitted Matter, *Ctr. For Biol. Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. May 22, 2017]
905 *Id.,* at 21
906 CCR, Title 14
907 Final EIR Appendix 2.0-C.Rev
908 DRP 2017, Exhibit 4-20; *Id.,* pp. 4-91 and -92

manufacturing uses) on approximately 597 gross acres; and approximately 1,034,550 sf of Commercial uses on approximately 102 acres. Proposed Institutional/Civic land uses (such as schools for higher education, medical facilities, library, and other civic uses) encompass approximately 1,568,160 sf on approximately 110 acres. The Project includes approximately 130,680 sf of Recreation/Entertainment uses (clubhouse, farmers market, childcare facilities, health clubs) on approximately 75 acres. Proposed sites for major utility facilities that would serve the entire community (e.g., wastewater reclamation facilities, water treatment facility, water bank, materials recovery facility) encompass approximately 191 acres, and Kindergarten through 12th grade (K-12 schools would be located on approximately 145 acres. Approximately 5,624 acres (approximately 45.6 percent) of the 12,323-acre Project site are proposed for Open Space for natural resource protection and greenways, and parks for active and passive recreational use.

Draft EIR page 4-91 states that although the phasing program may be revised by the Project Applicant/Developer, any such revision is subject to County approval during the tentative tract map process required by the Los Angeles County Subdivision Ordinance and the development requirements in the Centennial Specific Plan.[909] Development within the Project site will require the preparation and implementation of tentative tract maps (TTMs). As discussed on Draft EIR page 4-92, the TTMs serve as the implementing mechanisms for Project land uses, and all TTM land uses must be consistent with the Centennial Specific Plan.[910] Chapter 4 of the Specific Plan describes the processes and procedures for implementing the Specific Plan, including the processes and procedures for subsequent Project approvals such as future TTMs. Chapter 4 of the Specific Plan also establishes mechanisms that allow for flexibility in the development of the Project to respond to market conditions over the anticipated buildout of the Project while ensuring consistency with the purpose and intent of the Specific Plan. Specific Plan Section, 4.5.2 Discretionary Conformance Review, provides that significant modifications of the Specific Plan, including land use adjustments under Specific Plan Section 4.6, (Specific Plan Adjustment, Transfer, and Conversion Regulations) are subject to discretionary review and approval, including additional CEQA analysis as applicable.[911]

Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to this Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code. As discussed in the California Bureau of Real Estate Reference Guide, the California Subdivision Map Act[912] sets forth the conditions for approval of a subdivision map and requires enactment of subdivision ordinances by which local governments have direct control over the types of subdivision projects to be undertaken and

909 Final EIR Appendix 4.0-A.Rev
910 *Ibid.*
911 DRP 2017, Appendix 4.0-A, p. 4-8
912 Government Code § 66410, et seq.

the physical improvements to be installed. The primary objectives of the Act include the coordination of a subdivision's design (lots, street patterns, rights-of-way for drainage and sewers, etc.) with applicable plans and insuring that public improvements are properly completed to avoid undue burdens on the taxpayers of the community.[913] The Los Angeles County Subdivision Ordinance was enacted in accordance with state law, and the approval of each future TTM for the Project must ensure compliance with the Specific Plan and that public facilities, including transportation improvements that meet Project demand under forecasted cumulative conditions, are implemented without resulting in undue burdens to County and other taxpayers.

As discussed in response to Comment F.8-11, while the development of specific future phases and components of the Project will be based on the state of the economy, market demand for uses on the site and the timing of regional and off-site infrastructure the Project land use approval process required by the Specific Plan, the implementation of the Subdivision Map Act by the County, and the MMRP ensure that future development will occur in a balanced pattern consistent with the Draft EIR and Specific Plan. Project development may only proceed after subsequent County approval of future TTMs. The TTM review and approval process and the MMRP requires an environmental evaluation to confirm that the Project's interim buildout (including the interim buildout of different categories of uses) does not cause any new or more significant adverse environmental impacts that were not evaluated in the EIR. As discussed in the response to Comment F.8-12, the Project description and analysis of future development is accurate, stable, finite, and complies with CEQA in all respects. As stated in the May 2017 Los Angeles Superior Court decision affirming the validity of the AVAP EIR against a lawsuit brought by the Commenter, "[t]he CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project."[914] The Draft EIR also fully analyzes Project impacts, both during the approximately 20 years of buildout and during foreseeable future operations. The comment provides no support for the claim that unbalanced development (e.g., solely residential development or abandoned commercial and non-residential development) could reasonably occur under the applicable land use approval process, the MMRP requirements for the Project. The extreme outcomes referenced in the comment are highly unlikely and purely speculative.

With respect to traffic, as discussed on pages 5.10-49 to 5.10-51 of the Draft EIR, the Project analysis includes a discussion of internal and external "tripends" and "trips." Each "trip" includes two "tripends", a starting tripend and an ending tripend. A "tripend" refers to a trip start or destination point. An internal trip is a trip that both starts and ends within the Project site, and therefore has two internal tripends. An external trip is a trip with either a starting or ending point outside of the Project site, and therefore has just one internal tripend. An internal tripend can be a trip that either starts or ends in the Project site, such as from a residence or at a place of employment.

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913 California Bureau of Real Estate Reference Guide, Chapter 17, Subdivisions and Other Controls, available at http://www.dre.ca.gov/Publications/ReferenceBook.html.

914 Ruling on Submitted Matter, *Ctr. For Biol. Diversity v. Cty. of Los Angeles*, No. BS156932, page 21 [L.A. Cty. Sup. Ct. May 22, 2017] citing *County of Inyo v. City of Los Angeles* [1977] 71 Cal.App.3d 185, 199

As discussed on Draft EIR pages 5.10-2 to 5.10-5, the Project Draft EIR uses the most recent version of the North County Sub-Area Model to evaluate traffic conditions in north Los Angeles County, including the Project site. This version of the model was updated by Los Angeles County to reflect the Antelope Valley Area Plan (AVAP) approved by the County in June 2015. Notably, no party, including the Commenter, challenged the AVAP EIR's traffic analysis within the applicable statute of limitations, and therefore the AVAP EIR's traffic analysis is now "conclusively presumed to comply" with CEQA.[915] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the EIR's traffic analysis (Petition for Writ of Mandate, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. July 16, 2015]; Petitioner's Opening Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. Oct. 24, 2016]; Petitioner's Statement of Issues, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. Oct. 24, 2016]; Petitioner's Reply Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. Jan. 18, 2017]). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[916]

The updated North County Sub-Area Model used in the AVAP EIR affirmed by the Superior Court provides the estimates of Project internal trips and tripends utilized in the Draft EIR. As shown in Table 5.10-19 of the Draft EIR, the model projects that about 48 percent of the Project's total average daily trips (ADT) at buildout will be internal, and 52 percent will be external to the Project site. Accordingly, the model also projects that about 65 percent of the Project's full buildout total average daily tripends (the start or ending of a trip) will be related to trips internal to the site, and 35 percent will be related to trips that travel external to the site.

The proportion of trips and tripends that are projected to be internal and external to the Project site by the North County Sub-Area Model are based on model parameters such as population, employment and the relative distances between areas for which Project trips will be made. As discussed on Draft EIR page 5.10-50 the Project includes schools, parks, and retail shopping areas within the Project site located and sized to meet the Project's residential and workforce needs. The Project site is relatively isolated from other, similar amenities and most of the trips generated by travel to and from these locations will be internal to the Project area. In addition, at buildout, the Project will include approximately 10.1 million square feet (sf) of commercial office, shopping/retail, and industrial land uses that will provide approximately 23,675 jobs, many of which would be filled by future residents. In comparison, applicable traffic models for the Lancaster/Palmdale area, which is larger than the Project but also relatively isolated from other developed amenity and employment locations, project that 70 percent of all tripends are internal to the region.[917]

915 CEQA § 21167.2

916 Ruling on Submitted Matter, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. May 22, 2017], at p. 13

917 Enhanced Antelope Valley Transportation Analysis Model Version 2.0, City of Palmdale

Similarly, traffic models indicate that 74 percent of the total tripends in the Santa Clarita Valley will be internal when the region is built out.[918]

The North County Sub-Area Model estimates of the Project's average daily internal and external trips and tripends at buildout is also consistent with available census bureau data of the percentage of residents who work within or outside of their places of residence for communities with similar locational characteristics as the Project. The table below summarizes the 2011-2015 American Community Survey (ACS) 5-Year Estimates of the percentage of all workers aged 16 or older working in their places of residence, or internal to 11 communities that are relatively isolated from other employment locations and that have approximately the same average total workforce as the Project at full buildout.

	Total Workforce Over 16 Years of Age	**Percent Working in Own Community**
Santa Maria California	43,861	60%
El Centro California	15,368	57%
Tehachapi California	3,343	54%
Porterville California	18,810	53%
Barstow California	7,927	51%
Paso Robles California	14,771	48%
Madera California	18,525	46%
Lancaster California	53,503	46%
Watsonville California	22,271	45%
Santa Clarita California	84,987	37%
Palmdale California	55,867	32%
AVERAGE	**30,839**	**48%**
Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Table S0810		

The ACS data indicates that the percentage of workers that are employed in their place of residence ranges from 60 percent in Santa Maria, California to 46 percent in Lancaster, California and 32 percent in Palmdale, California. The average percentage of work within the place of residence for the 11 communities is 48 percent. As discussed on Draft EIR page 5.10-50, most of the Project trips will be generated by residential land uses, and an average single-family residential unit generates approximately nine home-based trips per day. About two of these nine trips are home-based-work trips related to travel directly to and from work. The remaining trips are related to travel between residential units for a non- work activity such as school, shopping, or recreation, which may be trips that are entirely local or may represent one leg of a journey between home and the workplace. The percentage of internal trips and tripends for non-work activity in locations such as the Project which provide schools, recreational facilities and shopping opportunities that are relatively far from other options is generally higher than for work-related trips. Residents in relatively isolated

[918] Santa Clarita Valley Consolidated Traffic Model Version 4.1, City of Santa Clarita and the County of Los Angeles

locations are more willing to utilize local school, shopping, and recreational facilities than to modify or change employment even if the desired work requires a significant daily commute.

The internal trip rate for the Project that results from the North County Sub-Area Model is approximately the same as the average internal trip rate for work commutes in the 11 communities in California included in the ACS data (48 percent). Since more daily trips in a community are related to non-work purposes, and the percentage of non-work internal trips is typically higher than for employment purposes, these data indicate that the North County Sub-Area Model internal and external trip estimates for the Project are reasonable. A Lead Agency is entitled to rely on expert traffic model estimates as substantial evidence of a project's likely traffic impacts, including the air emissions associated with such traffic trips.[919] This comment does not question the accuracy of the North County Sub-Area Traffic Model, or provide evidence that the model is unreliable.

The MMRP requires that Project traffic conditions and impacts be analyzed in conjunction with each TTM application. MM 10-2, for example, requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County. MMs 10-25 and 10-26[920] require that the Project Applicant confirm that all Specific Plan traffic-related requirements, including the creating and operation of a Transportation Management Agency, the implementation of facilities and measures that encourage non-automotive transportation, and the implementation of Transportation Demand Management measures, prior to County approval of a TTM. Consequently, Project and local traffic conditions and the need for the implementation of applicable mitigation measures in the MMRP that identify improvements to local and state highway facilities will be evaluated as the Project is developed and TTMs are submitted for County review and approval. If the Project traffic evaluated in a TTM application deviates significantly from projected levels, the County has the authority deny the approval of any new TTMs and additional development until Project conditions are verified to be within projected levels, or a new project application, with new CEQA analysis, is reviewed and approved.

As discussed on Draft EIR pages 4-91 to 4-92, while the development of specific future phases and components of the Project will be based on the state of the economy, market demand for uses on the site and the timing of regional and off-site infrastructure, the Project land use approval process required by the Specific Plan, the implementation of the Subdivision Map Act by the County, and the MMRP ensure that future development will occur in a balanced pattern. As discussed above, Project development may only proceed after County approval of future TTMs. The TTM review and approval process requires an environmental evaluation to confirm that the Project's interim buildout (including the interim buildout of different categories of uses) does not cause any new or more significant adverse environmental impacts that were not evaluated in the EIR. The MMRP specifically requires that traffic studies be prepared and that Specific Plan transportation measures be confirmed in conjunction with each TTM application. In the event that, as the comment

919 *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal* (1988) 47 Cal.3d 376, 410; *National Parks & Conserv. Ass'n v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1362

920 Final EIR Appendix 2.0-C.Rev

suggests, the Project's residential development substantially outpaces the proposed onsite employment or commercial land uses, the environmental and traffic analysis required for each TTM would find that Project-related traffic differs from the traffic volumes and patterns considered in the EIR. If these differences are found to generate new or more severe significant impacts, a subsequent EIR, additional public and agency review, and future feasible mitigation to avoid or reduce Project traffic-related impacts under the conditions documented during the TTM review and approval process would be required before any additional development is approved.

With respect to the Draft EIR GHG and air quality analysis, as discussed above the Draft EIR adequately describes the proposed Project buildout and meets CEQA requirements with regard to project description. CEQA Section 21166 requires the preparation of a subsequent or supplemental EIR if (a) substantial changes are proposed in the Project which would require major revisions of the EIR; (b) substantial changes occur with respect to the circumstances under which the Project is being undertaken which will require major revisions in the EIR; or (c) new information, which was not known and could not have been known at the time the EIR was certified as complete, becomes available. In the event that the review and approval process for subsequent Project TTM and related approvals determines that new or more severe significant GHG or air quality impacts than considered in the Draft EIR could occur, a new public review and comment process and County discretionary consideration of tract map applications with new or revised Project elements would be necessary before additional development could be approved.

As discussed above, the Project cannot result in excess GHG or air quality emissions or cause a "carbon debt" due to significantly unbalanced development as suggested in the comment without triggering additional review. If the extreme hypothetical included the comment were to occur, the Project would require a supplemental or subsequent EIR to address the significant deviation in GHG and air quality emissions considered in the Draft EIR. The Draft EIR acknowledges that any such major Project change would require further CEQA analysis.[921] Similarly, any change to Project design and components that would cause new or more significant adverse climate change or air quality impacts would trigger the requirement for supplemental or subsequent CEQA review. Any such further CEQA review would also require the contemplation of feasible mitigation measures to avoid or reduce impacts.

In summary, and as also discussed in responses to Comments F.8-11 and F.8-12, the EIR Project's Description, including the discussion of Project phasing, is accurate, stable, finite, and complies with CEQA in all respects. The analysis of Project internal and external trips and tripends utilizes the updated North County Sub-Area Model developed by the County for the 2015 AVAP update. The AVAP EIR, including the traffic analysis, were upheld in a lawsuit brought by the Commenter in May 2017 and are presumed valid under CEQA. The model results for Project internal and external trips and tripends are consistent with data from 11 similarly located communities provided in the most recent 5-year ACS estimates published by the U.S. Census Bureau. The analysis of potential traffic, GHG and air quality impacts

[921] DRP 2017, p. 4-91

properly analyzes the full buildout of the Project, incorporates the results of the North County Sub-Area Model and complies with CEQA requirements in all respects.

Response to Comment F.8-14:

With regard to the provision of school sites as part of the Project, the Project Applicant/Developer has consulted with the applicable school districts concerning the number and location of school sites required for the Project. Draft EIR Section 4.0, Project Description, includes multiple school sites based on the most current student generation rates for residential households when the Draft EIR was prepared. The one proposed K-5 and three proposed K-8 schools in the western section of the Project site, within the Gorman District boundaries, would have a total capacity for 4,980 students and would be adequate to accommodate the 4,708 Project-area students who would reside within the Gorman District service area.[922] The two K-8 schools included in the Westside Union Elementary School District (WUSD) portion of the Project site would have a total capacity for 2,760 students, which would accommodate the 2,551 Project-area students who would reside within the WUSD service area.[923] The planned high school site in the central portion of the Project site would have a minimum size of 60 acres and be capable of accommodating up to 3,350 students, which would accommodate the 2,885 Project-generated high school students.[924]

The ultimate sizing of school sites would depend on further consultation with the school districts with regard to necessary inter-district transfers, the grade breakdown for students attending the schools, the implementation of school size reduction efforts, building layout and configuration needs, and the outdoor facility needs for each school.[925] The final designation of school sites for the Project will be completed with each future tract map.[926] As required by MM 15-2 in the Mitigation Monitoring and Reporting Program (MMRP) for the Project,[927] the Applicant/Developer is required to enter into agreements with all school districts for the provision of school facilities to serve the Project prior to approval of a tentative map. The current agreements between the Project and local school districts,[928] provide that school sites would be conveyed to the school district for the exclusive use for a school and related education and recreational purposes.

However, the school district may decide that a site is not needed for a school. This is not a decision that is up to the discretion of the Applicant/Developer, but rather is subject to school district discretion. The current agreements between the Project and local school districts[929] provide that if a school site is subsequently determined to be surplus property by the school district, the Project Developer will have the right of first refusal to acquire the land. Also, if the school district is unwilling to acquire the land that has been reserved by the

922 *Id.,* p. 5.15-15
923 *Id.,* p. 5.15-17
924 *Id.,* p. 5.5-19
925 *Id.,* pp. 5.15-17 and -19
926 *Id.,* p. 5.5-18
927 Final EIR Appendix 2.0-C.Rev
928 DRP 2017, Appendices 5.15-B and 5.15-C
929 *Ibid.*

Project Applicant/Developer as a school site by the applicable acquisition deadline, the Applicant/Developer is no longer required to reserve the site and may develop it with overlying or alternative uses allowed by the Specific Plan.[930] However, the total number of permitted residential units on the Project site would not change from the maximum of 19,333 housing units analyzed in the Draft EIR.

Consequently, and contrary to the comment, the Project cannot reject school sites that are desired by the applicable school districts, the Draft EIR provides a description of how school site identification and rejection by a district could occur, and a school site rejection cannot result in the development of "more homes" as suggested in the comment. The comment provides no evidence of any kind supporting the plausibility of such an unlikely outcome. In fact, access to schools in close proximity with residential units is a highly valued amenity that increases the desirability of and demand for housing units. The relationship between property values and schools is the primary reason why communities with accessible schools have decisively approved significant school tax and bond measures in California notwithstanding the state's requirements that these measures be approved by a supermajority vote.[931] Consequently, residential developments have significant economic incentives to ensure that schools are implemented with housing in a balanced manner.

In addition, as discussed in responses to Comments F.8-11 and F.8-12, the MMRP requires that Project traffic conditions and impacts be analyzed in conjunction with each tentative tract map (TTM) application. Project and local traffic conditions and the need for the implementation of applicable mitigation measures in the MMRP that identify improvements to local and state highway facilities will be evaluated as the Project is developed and TTMs are submitted for County review and approval. If the Project traffic evaluated in a TTM application deviates significantly from projected levels, the County has the authority deny the approval of any new TTMs and additional development until Project conditions are verified to be within projected levels, or a new project application, with new CEQA analysis, is reviewed and approved.

As discussed on Draft EIR pages 4-91 to 4-92, while the development of specific future phases and components of the Project will be based on the state of the economy, market demand for uses on the site and the timing of regional and off-site infrastructure, the Project land use approval process required by the Specific Plan, the implementation of the Subdivision Map Act by the County, and the MMRP ensure that future development will occur in a balanced pattern. As discussed above, Project development may only proceed after County approval of future TTMs. The TTM review and approval process requires an environmental evaluation to confirm that the Project's interim buildout (including the interim buildout of different categories of uses) does not cause any new or more significant adverse environmental impacts that were not evaluated in the EIR. The MMRP specifically requires that traffic studies be prepared and that Specific Plan transportation measures be confirmed in conjunction with each TTM application. In the event that, as the comment suggests, school sites are rejected by a district in accordance with the district's agreements

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931 See https://ballotpedia.org/Culver_City_Unified_School_District_Bond_Issue,_Measure_CC_(June_2014).

with the Project[932] the potential environmental and traffic impacts that could be generated by this result would analyzed prior to TTM approval. If the analysis finds that Project-related traffic, or related air quality and climate change impacts exceed the levels considered in the EIR a subsequent EIR, additional public and agency review, and future feasible mitigation to avoid or reduce Project the impacts under the conditions documented during the TTM review and approval process would be required before any additional development is approved.

In summary, Project development implemented through the TTM review and approval process and subject to the MMRP requirements will not allow for significant deviations from the traffic, GHG, air quality or other related impacts considered in the Draft EIR without additional CEQA review and approval. The Draft EIR analysis of school sites provides future flexibility about specific development details that is consistent with CEQA and does not render the Project Description unstable or incomplete.[933]

Response to Comment F.8-15:

The Project Description includes a summary of the Project's transportation management obligations in Section 4.5.5, Mobility Plan, and on Draft EIR pages 4-30 to 4-39. The Mobility Plan is discussed in additional detail in Specific Plan Section 3.3, Mobility Plan, and in Specific Plan Appendix Section 2-C, Mobility Plan.[934] The Mitigation Monitoring and Reporting Program (MMRP)[935] requires, among other mandatory actions, the implementation of the Mobility Plan in the Specific Plan (see Final EIR MMs 10-25 and 10-26). The Mobility Plan includes, among other measures, (a) the provision of an extensive system of sidewalks, greenway trails, community trails, and two transit hubs to serve as alternative means of transportation on the Project site, (b) the creation and operation of a Transportation Management Association (TMA) to implement transportation improvements and programs, including transit and on-demand services, and implementation of Transportation Demand Management (TDM) measures to reduce dependence on the automobile, provide for a more efficient use of transportation resources among Project occupants, and reduce pollutant emissions, (c) construction of sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas, (d) small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations, (e) pedestrian environments incorporated with public streets, (f) parking behind buildings to encourage walking in retail areas along street frontage, and (f) parks within 0.25 mile of 80 percent of all residential units. MM 10-25 also requires that the TMA implement transit and transportation measures to ensure that (1) a minimum of 30 percent of total daily internal on-site trips, and (2) a minimum of 20 percent of peak hour external commuting trips are completed by using transit modes other than single-occupancy automobiles.

932 DRP 2017, Appendices 5.15-B and 5.15-C
933 *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* [2014] 227 Cal.App.4th 1036
934 DRP 2017, Appendix 5.10-A
935 Final EIR Appendix 2.0-C.Rev

The Draft EIR and Specific Plan discuss several Project design features and TDM measures that would reduce incentives to make trips using single occupancy automobiles and encourage the use of alternative modes of transportation. These measures include compact Project designs organized in villages where residential units, commercial facilities, employment generating land uses and other Project facilities are in close proximity and linked with bicycle and walking trails and the provision of transit centers, parking policies and local transportation systems that encourage non-automotive trips, and transit facilities and linkages with transit service providers to provide Project area residents and employees with multiple modes of accessibility for internal and external trips. The MMRP requires County verification of compliance with the Specific Plan Mobility Plan, including the internal and external non-single occupancy automotive trip objectives in MM 10-25, with each tentative map application (see references to the "Action Required," "When Monitoring to Occur," "Responsible Agency or Party," and "Monitoring Agency or Party in the columns applicable to Final EIR MMs 10-25 and 10-26[936]). MM 10-2 also requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County.

As discussed in Specific Plan Appendix 2-C, the Project Mobility Plan requires the requires the formation and funding of a TMA to promote, manage, and monitor transit and mobility services and infrastructure prior to the issuance of the first occupancy permit for the Project. The TMA will be responsible for monitoring the form of Project residential and employment travel, or transit modes and ensuring that the Project meets its mobility objectives. Table 2-C-1 lists TDM and auto demand reduction measures that have been documented and evaluated by planning and research groups that will be implemented by the TMA. Table 2-A-1 in Specific Plan Appendix 2-A lists the Project's Green Development Program implementation measures, which include verification to the County that, prior 5,000th residential occupancy permit for the Project, the TMA has contracted with one or more public transportation providers to implement systems consisting of low-emissions buses, special charter operations, on- demand car or van services, or other types of transit to increase public transit ridership and reduce vehicle trips and facilitate community connectivity.

Section 4 of Specific Plan Appendix 2-C requires that the TMA adaptively manage compliance with the internal and external mobility performance standards in the MMRP by conducting transit mode surveys and other appropriate monitoring activities. Additional TDM measures will implemented by the TMA as may be required to achieve the Mobility Plan goals, including the potential use of emerging transportation technologies listed in Table 2-C-2. Transit mode surveys using standard methodologies for assessing trip counts and transit and alternative transportation mode use, and other appropriate monitoring activities will be conducted to verify the effectiveness of the TDM measures. The monitoring and adaptive management process will be a continuing obligation of the TMA to verify compliance with the MMRP internal and external mobility performance standards over time. As discussed in more detail in response to Comment F.8-11, the tentative map approval process serves as the implementing mechanism for Project land uses, and all tentative map land uses must be

936 *Ibid.*

consistent with the Centennial Specific Plan.[937] Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to this Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code.

Consequently, compliance with the requirements in accordance with the MMRP, which incorporates the Specific Plan Mobility Plan requirements, provides an enforceable, mandatory mechanism ensuring that the provisions of MMs 10-25 and 10-26, including the internal and peak hour external transit modes requirements, are achieved. The traffic studies required for each tentative tract map application will provide the County with traffic monitoring information sufficient to evaluate compliance with MMs 10-25 and 10-26. Excess single occupancy vehicle commuter trips or underutilized transit services, for example, could be documented by the required monitoring during early phases of the Project. These results would require the identification and implementation of TDM measures during the tentative map review and approval process that would increase the use of alternative transit modes over time. If the Project transportation conditions evaluated in each tentative map application indicate, for example, that total Project trips and the transit modes utilized for internal and peak hour external trips at buildout would not achieve the levels required in the MMRP, the County has the authority deny the approval of any new tentative maps and additional development until a means for comply with these requirements is demonstrated to the satisfaction of the County. Alternatively, a new project application, with new CEQA analysis, would be required for any additional development. Contrary to the comment, the Project mitigation measures, including the required internal and external trip transit mode requirements, are enforceable and feasible.

Response to Comment F.8-16:

This comment concerns the Transportation Management Association (apparently mis-cited as a "transmit management authority" in the comment) and transit facilities for the Project. The Project Description includes a summary of the Project's transportation management obligations in Section 4.5.5, Mobility Plan, and on Draft EIR pages 4-30 to 4-39. The Mobility Plan is discussed in additional detail in Specific Plan Section 3.3, Mobility Plan, and in Specific Plan Appendix Section 2-C, Mobility Plan.[938] The Mitigation Monitoring and Reporting Program (MMRP)[939] requires, among other mandatory actions, the implementation of the Mobility Plan in the Specific Plan (see Final EIR MMs 10-25 and 10-26). The Mobility Plan includes, among other measures, (a) the provision of an extensive system of sidewalks, greenway trails, community trails, and two transit hubs to serve as alternative means of transportation on the Project site, (b) the creation and operation of a Transportation Management Association (TMA) to implement transportation improvements and programs,

937 Final EIR Appendix 4.0-A.Rev
938 DRP 2017, Appendix 5.10-A
939 Final EIR Appendix 2.0-C.Rev

including transit and on-demand services, and implementation of Transportation Demand Management (TDM) measures to reduce dependence on the automobile, provide for a more efficient use of transportation resources among Project occupants, and reduce pollutant emissions, (c) construction of sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas, (d) small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations, (e) pedestrian environments incorporated with public streets, (f) parking behind buildings to encourage walking in retail areas along street frontage, and (f) parks within 0.25 mile of 80 percent of all residential units. MM 10-25 also requires that the TMA implement transit and transportation measures to ensure that (1) a minimum of 30 percent of total daily internal on-site trips, and (2) a minimum of 20 percent of peak hour external commuting trips are completed by using transit modes other than single-occupancy automobiles.

The Draft EIR and Specific Plan discuss several Project design features and TDM measures that would reduce incentives to make trips using single occupancy automobiles and encourage the use of alternative modes of transportation. These measures include compact Project designs organized in villages where residential units, commercial facilities, employment generating land uses and other Project facilities are in close proximity and linked with bicycle and walking trails and the provision of transit centers, parking policies and local transportation systems that encourage non-automotive trips, and transit facilities and linkages with transit service providers to provide Project area residents and employees with multiple modes of accessibility for internal and external trips. The MMRP requires County verification of compliance with the Specific Plan Mobility Plan, including the internal and external non-single occupancy automotive trip objectives in MM 10-25, with each tentative map application (see references to the "Action Required," "When Monitoring to Occur," "Responsible Agency or Party," and "Monitoring Agency or Party in the columns applicable to Final EIR MM 10-25 and 10-26[940]). MM 10-2 also requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County.

As discussed in Specific Plan Appendix 2-C, the Project Mobility Plan requires the requires the formation and funding of a TMA to promote, manage, and monitor transit and mobility services and infrastructure prior to the issuance of the first occupancy permit for the Project. The TMA will be responsible for monitoring the form of Project residential and employment travel, or transit modes and ensuring that the Project meets its mobility objectives. Table 2-C-1 lists TDM and auto demand reduction measures that have been documented and evaluated by planning and research groups that will be implemented by the TMA. Table 2-A-1 in Specific Plan Appendix 2-A lists the Project's Green Development Program implementation measures, which include verification to the County that, prior 5,000th residential occupancy permit for the Project, the TMA has contracted with one or more public transportation providers to implement systems consisting of low-emissions buses, special charter operations, on- demand car or van services, or other types of transit

940 *Ibid.*

to increase public transit ridership and reduce vehicle trips and facilitate community connectivity.

Section 4 of Specific Plan Appendix 2-C requires that the TMA adaptively manage compliance with the internal and external mobility performance standards in the MMRP by conducting transit mode surveys and other appropriate monitoring activities. Additional TDM measures will implemented by the TMA as may be required to achieve the Mobility Plan goals, including the potential use of emerging transportation technologies listed in Table 2-C-2. Transit mode surveys using standard methodologies for assessing trip counts and transit and alternative transportation mode use, and other appropriate monitoring activities will be conducted to verify the effectiveness of the TDM measures. The monitoring and adaptive management process will be a continuing obligation of the TMA to verify compliance with the MMRP internal and external mobility performance standards over time. As discussed in more detail in response to Comment F.8-11, the tentative map approval process serves as the implementing mechanism for Project land uses, and all tentative map land uses must be consistent with the Centennial Specific Plan.[941] Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to this Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code.

MM 10-25 specifically requires that the "Project Applicant/Developer" implement the Mobility Plan, including the provision of "two transit hubs to serve as alternative means of transportation on the Project site." As discussed above, these measures, and the creation and funding of the TMA, are obligations that the Project must fulfill prior to the approval of any tentative tract map. The amount of the funding provided for the TMA and to meet the mandatory transit facility obligations imposed on the Project by the MMRP, and verified by the County prior to the approval of each tract map, will be determined based on applicable costs and TMA implementation requirements, including TDM measures, determined in the traffic analysis required for each tract map. Page 4-37 of the Draft EIR states that, as in other unincorporated areas of Los Angeles County, funding for the local transit system would come from a combination of Proposition A and property taxes. Proposition A is a County measure enacted by the voters in 1980 that provides funding to increase the County's ability to respond to gridlock and mobility challenges. The Project would be eligible to apply for this funding subject to availability and the approval of County transit agencies. Property taxes are also a common means of funding transit improvements that benefit the regional community. As discussed on page 4-38 of the Draft EIR, the costs of existing fare revenues currently cover about 90 percent of the costs of commuter service in the Antelope Valley, and it may be possible to cover any fare-related funding shortfall for Project transit services by seeking approval for Proposition A and property taxes. The MMRP, however, does not reference either funding source for the Project transit facilities, and requires that the Project

941 Final EIR Appendix 4.0-A.Rev

fund and implement all transit and related improvements described in the Draft EIR and MMRP. If Proposition A or property tax revenues are not available the Project is required to provide full funding for all of these improvements.

Response to Comment F.8-17:

This comment concerns the preferred State Route (SR) 138 preferred alternative designated in June 2017. The Draft EIR discusses the Northwest State Route 138 Corridor Improvement Project ("NW SR-138 project"), including SR-138 improvement alternatives, design, purpose and how the alternatives related to the Project's proposed circulation system in Section 4.0, Project Description, pages 4-39 to 4-41, Section 5.10, Traffic, Access, and Circulation, pages 5.10-34 to 5.10-36, and Section 7, Cumulative Impacts, pages 7-8 to 7-9. This information was based on the Draft EIR/EIS for the NW SR-138 project which was circulated for public review and comment in July 2016. A Notice of Completion and Availability for the Project Draft EIR was filed by the County on May 15, 2017 and the 60-day comment period began on May 17, 2017.

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

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

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

(c) utilizing the Alt 2 facilities and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout. The STS identifies certain mitigation measure clarifications required to address the design details of Alt 2 and to connect the Project internal circulation system with the Alt 2 facilities. The STS determined that the implementation of Alt 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 FEIR and the Project Draft EIR.[942] The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

The STS findings include the following:

- Under interim cumulative traffic conditions, the current SR-138 facilities would accommodate approximately 10 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[943]
- Under existing traffic plus Project conditions, the implementation of Alt 2 would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[944]
- Under interim cumulative traffic plus Project conditions, the implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[945]
- Under long-range cumulative traffic plus Project conditions, the implementation of Alt 2 and additional SR-138 improvements would accommodate the full buildout of the Project without adversely affecting applicable LOS standards[946].

The STS compares the Project's potential impacts identified in the Draft EIR for Interstate (I) 5, SR-14, and SR-99 facilities using the volume to capacity methodology specified by the Congestion Management Plan for Los Angeles County and the Project's potential impacts using the Caltrans' recommended HCM methodology. HCM calculations were prepared for 62 locations within the Draft EIR study area consisting of freeway segments in advance of and after major system interchanges as well as representative locations between major system interchanges. The analyzed locations provide a comprehensive coverage of the Draft EIR study area because they include the freeway facilities with the greatest potential to be affected by congestion. Under existing plus Project conditions, the Draft EIR and the STS show that all applicable highway segments, intersections and ramps would operate at acceptable LOS levels.[947] Under cumulative plus Project conditions with mitigation, the Draft EIR and the STS show that almost all applicable highway segments, intersections and ramps

942 Final EIR, Appendix 5.10-C, Sections 2.5 and 3
943 *Id.,* Appendix 5.10-C, Tables 3-3 and 3-4
944 *Id.,* Appendix 5.10-C, Tables 3-1, 3-2, and 3-9
945 *Id.,* Appendix 5.10-C, Tables 3-5 and 3-6
946 *Id.,* Appendix 5.10-C, Tables 3-7, 3-8, and 3-9
947 *Id.,* Appendix 5.10-C, Table 4-1

would operate at acceptable LOS levels.[948] The STS indicates that certain study locations, such as the Grapevine grade segment of I-5, would not meet HCM-based LOS standards because topographic conditions, lane and speed controls and other localized conditions would result in higher traffic densities. As shown in STS Table A-5, however, LOS conditions would be worse under cumulative without Project conditions, and LOS conditions improve under cumulative with Project conditions with the implementation of the Project mitigation measures.[949] Consequently, the Project does not result in a significant impact at any location that does not meet HCM-based LOS standards under cumulative with Project conditions with mitigation.

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

- To connect the Project circulation system to the Alt 2 facilities, an additional intersection and certain intersection upgrades, such as additional lanes, will be constructed at locations where SR-138 borders the Specific Plan boundary.[950]
- The implementation of Alt 2, including minor modifications in certain intersection locations within the Specific Plan area to accommodate the Alt 2 design details, that accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative traffic conditions.[951]
- SR-138 improvements in addition to Alt 2 that would be required to accommodate all of the Project's buildout traffic under the long-range cumulative traffic conditions projected in the Draft EIR and STS.[952]

As discussed in the STS, and as shown below, the Project's mitigation measures have been clarified to reflect the implementation of these improvements with Alt 2.[953] As required by

948 *Id.,* Appendix 5.10-C, Table 4-2
949 *Id.,* Appendix 5.10-C, Section 5
950 *Id.,* Appendix 5.10-C, Sections 2.2 and 2.3
951 *Id.,* Appendix 5.10-C, Section 2.1
952 *Id.,* Appendix 5.10-C, Section 2.4
953 *Id.,* Appendix 5.10-C, Section 5

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

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

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

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

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

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

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

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

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

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

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

Although mitigation measures identified for Caltrans facilities would reduce Project impacts, it is outside the control of the County of Los Angeles to implement these measures. The ~~CTIP~~ Traffic Mitigation Agreement or the Project Applicant's fair share contribution requirements in MM 10-3 and MMs 10-6 through 10-~~28~~24 and MMs 10-~~31~~27 through 10-~~45~~41 will provide funding for the planning, design, and construction of certain improvements. MM 10-4 requires the Project Applicant to work to establish a funding program to collect fair share contributions from other projects for the required improvements. Compliance with these mitigation measures would reduce traffic impacts to a less than significant level. Potential Project impacts would be significant and unavoidable, however, if the improvements are not constructed by Caltrans because the County (as the Lead Agency) lacks

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

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

TABLE 5.10-33
MITIGATION SUMMARY

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

TABLE 5.10-33
MITIGATION SUMMARY

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

TABLE 5.10-33
MITIGATION SUMMARY

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

TABLE 5.10-33
MITIGATION SUMMARY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

~~• Install traffic signal.~~

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- Three Points Road
- 60th Street West

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

5.10.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

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

Response to Comment F.8-17A:

Comment noted and the preferred alternative identified in the referenced document has been integrated into the Draft EIR as discussed in response to Comment F.8-17.

Response to Comment F.8-18:

The open space areas that fall into the Mitigation Preserve will remain preserved in perpetuity and managed long-term by Tejon Ranch Conservancy.[954] No development will be allowed to occur in the Mitigation Preserve. Outside of interstitial areas, conservation easements will be recorded.[955] Inside the development area in interstitial areas, development will not be allowed pursuant to the *Centennial Specific Plan*, but a conservation easement will not be recorded. CEQA does not require recordation of a conservation easement for lands not authorized for development as part of the Project, including interstitial Project open space areas.

In addition, to clarify the scope of permitted uses within the open space areas associated with the Project, four open space subdesignations (three on-site, one off-site) are hereby added to page 4-24 of Section 4.0, Project Description, of the Draft EIR, and conforming edits are made to the Specific Plan:

> CENTENNIAL OPEN SPACE DEFINITIONS
>
> Mitigation Preserve: The Mitigation Preserve encompasses 43,079 acres of land to be preserved and managed in perpetuity for biological resources values. The Preserve consists of an On-site Mitigation Preserve, comprised of approximately 3,866 acres within the Project boundaries, but outside of the development footprint, and an Off-site Mitigation Preserve made up of 39,213 acres within adjacent and nearby off-site lands. These mitigation lands provide sufficient land and biological resource values to implement mitigation strategies to fully mitigate for Project biological resource impacts.
>
> On-site Mitigation Preserve
>
> The On-site Mitigation Preserve is divided into two areas. The southern on-site mitigation area includes 968 acres located immediately south of the development footprint along south side of SR-138. The northern on-site mitigation area consists of 2,898 acres located to the north and west of the development footprint on the west side of the aqueduct. All of the lands within the on-site portion of the Mitigation Preserve are within Los Angeles County SEA No. 17.
>
> Uses within the On-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as

954 DRP 2017, PDF 7-10
955 *Id.,* PDF 7-11

hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, with the exception of the placement of two new water towers discussed below. Only habitat enhancement, restoration and creation activities approved by the County and described in the Mitigation Preserve Management Plan shall be permitted. New impacts shall be limited to the placement of two water towers with disturbance impacts of no more than five acres each. Grazing shall be allowed to continue as directed by the Mitigation Preserve Management Plan strictly for resource management values.

Off-site Mitigation Preserve

The Off-site Mitigation Preserve is divided into six areas. Area 1 consists of 6,417 acres located adjacent to and immediately east of the southeastern corner of the Project site. Area 2 consists of 2,556 acres located adjacent and contiguous to the northwestern portions of the Project site. Nearly all of the land within these two preserve areas also occurs within SEA No. 17. Area 3 consists of 4,183 acres; this mitigation area is located in Kern County, immediately north of the Project site. Area 4 consists of 7,319 acres located on the northern slope of the Antelope Valley, northeast of both Area 3 and the Project site. Area 5 consists of 643 acres and is a square-shaped parcel located in Kern County on the northern slope of the Antelope Valley, immediately east of Area 4 and northeast of the Project site. Area 6 consists of 2,429 acres and is located in Kern County on the northern slope of the Antelope Valley, farthest to the northeast of the Centennial Project site. Area 7 consists of two distinct areas that comprise 15,668 acres total. Area 7 is in Kern County on the northern slope of the Antelope Valley. The westernmost portion of Area 7 sits between Areas 3 and 4, while the easternmost portion occurs east of Area 4 and boarders Area 6 to the north. The combined off-site Mitigation Preserve area amounts to 39,213 acres of mitigation lands. Cumulatively, both on and off-site, the Mitigation Preserve encompasses 43,079 acres of Project mitigation lands. The majority of three of these areas, Areas 3 and, 4, and 5, are the subject of the Wildlife Conservation Board conservation easements that expressly allow for such mitigation use of these lands. These areas, although available for mitigation including enhancement, restoration, and enhancement, are not available for mitigation acreage value as preservation. Uses within the Off-site Mitigation Preserve shall be restricted to use and continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have

a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. No improvements beyond what is necessary to maintain roads, fences, etcetera, in their current state shall be allowed, Recreational hunting shall be restricted to Ranch authorized individuals and within designated hunting areas only. Only habitat enhancement, restoration and creation activities approved by the County and described in the Mitigation Preserve Management Plan shall be permitted. Grazing shall be allowed to continue as directed by the Mitigation Preserve Management Plan strictly for resource management values.

Green Space

Disturbed Green Space consists of areas within the project boundary that are impacted and will need to be mitigated. Disturbed Green Space will be amenities for the Project and could include one or more of the following uses: golf course, equestrian, natural parks, trails, cultural monuments, water retention basins, open space uses, utilities, grading, crop production, grazing, special events, and mitigation activities. No Mitigation credit has been taken into account for the Project impacts from the Green Spaces. While Green Spaces could be impacted initially, the concept of these areas is to restore it for community amenities and visual aesthetics between neighborhoods of development.

Undisturbed Green Space consists of areas within the project boundary that are not impacted and require no mitigation. There is no project mitigation credit taken for preserving these areas. To preserve these areas and to make sure there is no future mitigation needed, the uses are restricted to the following: Continued maintenance of existing ranch roads and trails for access as well as hiking and biking for private inholding owners and permitted Ranch guests. Public access and recreational hunting shall be prohibited. Authorized motorized vehicles including but not limited to Tejon Ranch employees, utility maintenance vehicles, that have a Tejon Ranch permit and emergency vehicles shall be restricted to existing ranch roads and all recreational motorized vehicles shall be prohibited. Restricted access signage shall be posted along interface with public areas. Wildlife friendly fencing will be used to demarcate the edge of restricted access green space.

Response to Comment F.8-19:

Comment noted. Specific responses to comment in the referenced document have been provided in responses to Comments F.8-354 to F.8-422.

Response to Comment F.8-20:

The Lead Agency disagrees with this comment's characterization of the Project as "classic sprawl". To the contrary, the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of

Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria pollutant and greenhouse gas (GHG) emissions and to promote public health. Indeed, the South Coast Air Quality Management District (SCAQMD) has determined that the Project's *Centennial Specific Plan* "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D.4-2). In making this determination, SCAQMD evaluated the Project from a "regional perspective" (see Comment D.4-1). When regional planning priorities are taken into consideration, it is clear that the Project cannot fairly be characterized as "classic sprawl," as explained below.

The Project Addresses Regional Housing Need

California's housing shortage has reached crisis levels.[956] Between 1980 and 2010, the construction of new housing units in the Los Angeles metro region fell far behind the national average.[957] During this period, new housing construction grew by 54 percent in the typical U.S. metro area, whereas new housing units in the Los Angeles metro area grew by just 20 percent.[958] The result has been skyrocketing housing prices. In 1970, California home prices exceeded the national average by 50 percent.[959] By 1980, the gap had widened to 80 percent.[960] As of 2015, the average home price in California exceeds the national average by 250 percent.[961] California rental prices are no better. Today, the average monthly rent in California exceeds the national average by 50 percent.[962]

Predictably, the impact of the housing crisis has been hardest on the region's most vulnerable populations. Between 1990 and 2012, poverty levels in the SCAG region have increased by 69 percent, with a quarter of all children living in poverty.[963] In the Los Angeles metro region, approximately 30 percent of the median household's total income is used to pay housing costs, 7 percent more than the national average.[964] However, the poorest 25 percent of Los Angeles metro area households spend, on average, 67 percent of their income on housing.[965] As a result, these low-income households are forced to spend less on other essentials. According to Harvard's Joint Center for Housing Studies, low-income households who spend more than 50 percent of their income on housing also spend 39 percent less on food than do households that spend less than 50 percent of income on

956 California, State of, Legislative Analyst's Office (LAO). 2015. California's High Housing Costs: Causes and Consequences (p. 28). Sacramento, CA: LAO. http://www.lao.ca.gov/reports/2015/finance/housing-costs/housing-costs.pdf.
957 *Id.,* p. 10
958 *Ibid.*
959 *Id.,* p. 12
960 *Id.,* p. 3
961 *Id.,* p. 7
962 *Id.,* p. 12
963 SCAG 2015, p. 3.14-13
964 LAO 2015, p. 25
965 *Id.,* p. 26

housing.[966] To seriously mitigate California's housing shortage and its disproportionate impact on low income households, California must construct 100,000 additional residential units on top of the 100,000 to 140,000 housing units the state is expected to build annually, and these units must be located almost exclusively in California's costal metro areas, including Los Angeles County.[967]

SCAG is the region's designated Metropolitan Planning Organization (MPO) and serves as a forum for regional agencies to engage in cooperative decision making and regional planning activities. Among other important functions, SCAG is required by law to prepare a Regional Housing Needs Assessment (RHNA) in consultation with the California Department of Housing and Community Development (HCD).[968] The RHNA quantifies the region's existing and future housing need for all income levels and allocates a fair share of that need to each city and county in the region.[969] The County is in turn required by law to periodically update its General Plan housing element to accommodate the County's fair share of the regional housing need by identifying sufficient land designated for residential use, subject to HCD approval.[970] HCD certified the County's current housing element in April 2014.[971]

SCAG projects that, through 2040, the regional population will grow by 20 percent, resulting in a net increase of approximately four million additional residents.[972] The entire North Los Angeles County Subregion, which includes Antelope Valley and the Project site, will have 245,473 households by 2020 and 331,399 households by 2040, an increase of 85,926 households over 20 years.[973] The unincorporated portion of this subregion is projected to have 69,982 households in 2020 and 116,546 households in 2040.[974] As explained in Draft EIR Section 5.9, Population and Housing, the County's housing element indicates that 30,145 new housing units are needed to meet future housing demand through 2021, a portion of which will be provided by the Project. It is anticipated that SCAG will adopt the next regional RHNA allocation in Fall 2020, with updated housing elements due by Fall 2021.

The Project is Consistent with the Region's Sustainable Communities Strategy

The RHNA also serves a key role in California's efforts to reduce statewide GHG emissions. The California Global Warming Solutions Act of 2006, adopted by Assembly Bill 32 (AB 32), identifies global warming as a serious threat to California's economy and environment, and directs the California Air Resources Board (CARB) to establish a comprehensive regulatory program to reduce the state's greenhouse gas (GHG) emissions to 1990 levels by 2020. To this end, AB 32 requires CARB to prepare a "Scoping Plan" for achieving the maximum

966 *Id.,* p. 27
967 *Id.,* pp. 34, 35
968 Government Code § 65584
969 *Id.,* §§ 65583(a)(1)
970 *Id.,* § 65580
971 California, State of, Department of Housing and Community Development, Division of Housing Policy Development (HCD). 2014. Letter from Glen A. Campora, HPD Assistant Deputy Director, to Richard J. Bruckner, Director of Los Angeles County Department of Regional Planning, dated April 20, 2014, RE: Los Angeles County's 5th Cycle (2013-2021) Adopted Housing Element. Sacramento, CA: HCD. http://www.hcd.ca.gov/community-development/housing-element/docs/lanlos_angeles_cou043014.pdf.
972 SCAG 2016a, p. 3
973 DRP 2017, Table 5.9-9
974 *Id.,* p. 5.9-16

technologically feasible and cost effective GHG emission reduction by 2020. The current Scoping Plan was adopted in 2014 and is expected to be updated in late 2017 or early 2018.[975,976] The 2017 update will include GHG reduction measures necessary to achieve a 40 percent reduction in GHG emissions below 1990 levels by 2030, as required by Senate Bill 32 (SB 32).

As explained in the Scoping Plan, the transportation sector is by far the largest source of California's GHG emissions, accounting for approximately 37 percent of total emissions.[977],[978] By way of comparison, the residential and commercial sectors account for just 6 percent and 5 percent of statewide GHG emissions, respectively, primarily attributable to the end use of natural gas and electricity.[979] Per the Scoping Plan, GHG emissions caused by electricity and natural gas use will be achieved through a variety of measures, including but not limited to de-carbonization (e.g., renewable energy portfolio standards; distributed solar and wind energy generation), carbon pricing (e.g., cap and trade), more stringent energy efficiency requirements (e.g., CALGreen building standards; pipeline efficiency improvements), demand response requirements (e.g., improved grid reliability), and waste management (e.g., recycling programs).[980]

The Scoping Plan also describes measures to achieve targeted GHG reductions of passenger vehicle emissions associated with the land use sector.[981] Key recommended actions include, but are not limited to, strengthening the state's Low Carbon Fuel Standard, putting 4.2 million zero-emission vehicles (ZEVs) on state roads, and increasing the use of ZEV buses and trucks. Finally, the Scoping Plan relies on implementation of so-called Sustainable Communities Strategies (SCS) prepared pursuant to Senate Bill 375 (SB 375) to reduce passenger vehicle miles traveled (VMT) and their associated GHG emissions through integrated land use and transportation planning.[982]

SB 375 tasks CARB with calculating per capita GHG emissions reduction targets for each of the regional MPOs.[983] Each MPO must then adopt an SCS that describes a regional development pattern and transportation network that, if implemented, will feasibly reduce VMT in an amount sufficient to achieve the regional GHG reduction target.[984] The SCS is adopted as a component of each MPO's federally mandated Regional Transportation Plan (RTP). By law, every SCS must accommodate the region's projected population growth over

975 California, State of, California Air Resources Board (CARB). 2014b (May). *First Update to the Climate Change Scoping Plan*. Sacramento, CA: CARB. http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.

976 California, State of, California Air Resources Board (CARB). 2016b (December 2). 2030 Target Scoping Plan Update, Discussion Draft. Sacramento, CA: CARB. https://www.arb.ca.gov/cc/scopingplan/2030target_sp_dd120216.pdf.

977 California, State of, California Air Resources Board (CARB). 2014. AB 32 Scoping Plan. Sacramento, CA: CARB. http://www.arb.ca.gov/cc/scopingplan/scopingplan.htm.

978 California, State of, California Air Resources Board (CARB). 2017b (January). The 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target. Sacramento, CA: CARB. https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf.

979 *Ibid.*

980 CARB 2014; CARB 2017b

981 *Ibid.*

982 *Ibid.*

983 Government Code § 65080

984 *Id.,* § 65080

a 20-year period, as well as an 8-year projection of the regional housing need, as determined through the RHNA process.[985]

In 2010, CARB set the current GHG reduction target for the SCAG region at 8 percent below 2005 per capita emissions levels by 2020, and 13 percent below 2005 per capita emissions levels by 2035.[986] Shortly thereafter, SCAG, its member agencies, and regional stakeholders engaged in a public process to prepare the region's first SCS. In order to weigh relative costs and benefits, the 2012 RTP/SCS working group evaluated four regional development patterns that would be capable of achieving the region's GHG reduction target while also accommodating future growth projections and housing needs.[987] The land use scenarios varied with respect to the mix of location (e.g., greenfield development vs. infill development), housing type (e.g., single-family versus multifamily), and transportation investments (e.g., roadway versus transit improvements).[988] These different land use scenarios were developed to explore their relative merits and they informed the project alternatives evaluated in the environmental impact report that SCAG prepared for the 2012 RTP/SCS (2012 RTP/SCS EIR).[989]

When it adopted the 2012 RTP/SCS, SCAG ultimately settled on a balanced land use plan that assumes a significant increase in multi-family housing to be constructed in urban infill areas and so-called High Quality Transit Areas (HQTA), but also targets some suburban and rural pockets of the region for additional housing and employment growth.[990] Under the SCAG's balanced land use plan, 68 percent of all new homes in the region would be constructed as multi-family units, and over 50 percent of new housing and employment growth would be located in urban infill areas and HQTAs.[991] The balanced land use plan also provides for approximately 33 percent of all new housing units to be constructed in suburban and rural residential areas of the region.[992] Over the County's initial objection, the 2012 RTP/SCS targets the Project site for significant growth, relying on socioeconomic projections at the level of individually mapped Traffic Analysis Zones (TAZs).[993,994,995] Indeed, SCAG's TAZ maps project that over 22,000 new households will be constructed in the Project area by 2035.[996]

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985 *Ibid.*

986 SCAG 2016a

987 Southern California Association of Governments (SCAG). 2012a. (April). 2012-2035 Regional Transportation Plan (p. 114). Los Angeles, CA: SCAG. http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf.

988 *Id.,* p. 117

989 *Ibid.*

990 SCAG 2012a, pp. 129, 130

991 Southern California Association of Governments (SCAG). 2011 (December). *Draft Environmental Impact Report for the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy* (SCH #2011051018) (p. 2-27). Los Angeles, CA: SCAG. http://rtpscs.scag.ca.gov/Documents/peir/2012/draft/2012dPEIR_Complete.pdf.

992 *Id.,* p. 2-30

993 SCAG 2012a, pp. 110, 111; DRP, p. 6-3

994 Southern California Association of Governments (SCAG). 2012f (April). *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy Comments and Responses* (p. 247). Los Angeles, CA: SCAG. http://rtpscs.scag.ca.gov/Documents/2012/final/2012fRTP_CommentsResponses.pdf.

995 Los Angeles, County of, Department of Regional Planning (LACDRP). 2012 (Feb. 14). Letter from Richard Bruckner, Director of Regional Planning, to Hasan Ikhrata, Southern California Association of Governments. Los Angeles, CA: LACDRP. http://rtpscs.scag.ca.gov/Documents/2012/pfinal/2012RTPSCScommentsGroup03.pdf.

996 *Ibid.*

SCAG's balanced land use plan provides significant environmental benefits over the "business as usual" land use plan analyzed as the "No Project" alternative in the 2012 RTP/SCS EIR. Under the No Project development pattern, approximately 742 square miles of undeveloped "greenfield" land would be converted to urban use, whereas the balanced land use plan would consume just 334 square miles of undeveloped land.[997] The No Project land use plan would thus result in far greater adverse impacts to aesthetic, biological, cultural, mineral, and water resources, as compared to the balanced land use plan.[998] The No Project land use plan would also generate 7 percent more VMT than the balanced land use plan, and would thus have significantly greater impacts related to the GHG and criteria pollutant emissions.[999] In addition, the No Project development pattern would have greater significant adverse impacts related to soil erosion, hazardous materials, and cumulative impacts than would SCAG's balanced land use plan.[1000]

The environmental advantages of SCAG's balanced land use plan are largely attributable its policy of significantly increasing the number of multi-family housing units constructed in urban infill areas. But the 2012 RTP/SCS EIR demonstrates that a land use policy focused on infill development risks going too far, as shown by its analysis of the so-called "Envision 2" alternative, which assumes significantly more aggressive infill development patterns than the balanced land use plan.[1001]

As acknowledged in the 2012 RTP/SCS, a regional development pattern that assumes a significant increase in small-lot single-family and multifamily housing located in infill locations near transit infrastructure is likely to result in the displacement of lower-income residents through so-called "gentrification".[1002] Increased transit accessibility in existing urban locations through public investment increases demand for housing near those transit amenities, which puts upward pressure on neighborhood land and housing prices.[1003] Moreover, multi-family housing units in structures that exceed two to three stories are significantly more expensive to construct than lower density structures and thus, to be profitable, must be priced to target higher income households.[1004] The resulting increase in housing costs often "price out" existing lower income residents from newly densified, transit accessible neighborhoods, forcing those households to relocate to less expensive neighborhoods with fewer transit options.[1005] According to the 2012 RTP/SCS EIR, the potential impacts related to household displacement would be significant and unavoidable under the balanced land use plan, but even more so under Envision 2's land use plan.[1006]

997 SCAG 2011, p. 4-16
998 *Id.,* p. 4-5
999 *Id.,* pp. 4-10, -14, -20
1000 *Id.,* p. 4-5
1001 *Id.,* p. 4-4
1002 SCAG 2012a, p. 129; SCAG 2011, p. 4-37
1003 Chapple, K. 2017 (April 26). *Developing a New Methodology for Analyzing Potential Displacement* (pp. 96, 97). University of California, Berkeley, CA. https://www.arb.ca.gov/research/apr/past/13-310.pdf.
1004 *Ibid.*
1005 *Ibid.*
1006 Southern California Association of Governments (SCAG). 2012d (March). *Final Environmental Impact Report for the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy* (SCH #2011051018) (p. 5-63). Los Angeles, CA: SCAG. http://rtpscs.scag.ca.gov/Documents/peir/2012/final/Final2012PEIR.pdf.

Since Envision 2 would substantially increase populations in urban infill areas, it would also have greater traffic congestion-related impacts in those communities than would occur under the balanced land use plan.[1007] In addition, Envision 2 would result in higher cancer and other health risks in areas proposed for high-density development adjacent to regional freeways – i.e. areas with the greatest concentration toxic air contaminants from vehicle emissions.[1008] Moreover, Envision 2 would put larger populations at risk of accidental hazardous materials exposure and seismic events than would otherwise occur under the balanced land use plan.[1009] Concentrating development within urban infill areas would also expose higher numbers of people to groundborne vibration and noise levels, and would have greater adverse impacts on education, recreation, fire, police protection, and emergency services.[1010] Finally, the capacity of existing water and wastewater pipelines and infrastructure systems would be exceeded at a disproportionately higher level in communities targeted for very high-density development pursuant to Envision 2.[1011]

Setting aside the significant adverse impacts of Envision 2, it is not clear that the region can realize GHG reductions through the SCS planning process much beyond the reductions anticipated by the 2016 RTP/SCS without significant changes in statewide transportation, regulatory and financing policy. Per SB 375, CARB is currently in the process of preparing its second round of regional GHG reduction targets.[1012] This next round of reduction targets is scheduled to take effect in 2018 and be indexed to years 2020 and 2035 to reflect SB 32's goal of achieving statewide GHG reductions of 40 percent below 1990 levels by 2030.[1013] As part of this target setting process, CARB solicited recommendations from the state's 18 MPOs, including its four largest MPOs, which collectively represent 82 percent of the state's total population – i.e., SCAG, the Bay Area's Metropolitan Transportation Commission (MTC), the San Diego Association of Governments (SANDAG), and the Sacramento Area Council of Governments (SACOG).[1014]

On May 1, 2017, the big four MPOs sent CARB a joint recommendation that the GHG reduction targets for their respective regions be set no higher than 18 percent below 2005 levels by 2035.[1015] As explained in that letter, the big four MPOs continue to push the envelope in terms of focused growth in land use, but feasible land use strategies cannot achieve deeper reductions in GHG emissions under the current state regulatory scheme.[1016] "Stress tests" performed by the big four MPOs demonstrate that increased fuel efficiency and lower fuel costs have combined to reduce auto operating costs.[1017] As a result, Californians drive more

1007 SCAG 2012d, p. 5-65
1008 *Id.,* p. 5-59
1009 *Id.,* pp. 5-60 and -61
1010 *Id.,* pp. 5-62 to-64
1011 *Id.,* p. 6-65
1012 California, State of, California Air Resources Board (CARB). 2017 (June). *California Air Resources Board Staff Report: Proposed Update to SB 375 Greenhouse Gas Emission Reduction Targets* (p. 1). Sacramento, CA: CARB. https://www.arb.ca.gov/cc/sb375/staff_report_sb375_target_update_june_full_report.pdf.
1013 *Id.,* p. 6
1014 *Id.,* p. A-1
1015 Metropolitan Transportation Commission et al. (MPO). 2017 (May 1) Letter from MTC, SACOG, SANDAG, and SCAG to Mary Nichols regarding MTC, SACOG, SANDAG and SCAG Joint Submittal SB 375 Target Recommendations. San Francisco, CA: MPO. https://www.arb.ca.gov/cc/sb375/appendix_b_mpo_scenario_and_data_submittals.pdf.
1016 *Ibid.*
1017 *Ibid.*

(the so-called "rebound effect"), making it more difficult to achieve GHG emission reductions though policies designed to incentivize fewer vehicle trips.[1018] This challenge is made more difficult by the success of CARB's Advanced Clean Cars Program and the emergence of a new fleet of zero emission vehicles (ZEV) on California roads.[1019] After all, transit improvements needed to take cars off the road are funded in large part by taxes on petroleum-based vehicle fuels, which ZEV drivers do not pay. In light of these realities, the big four MPOs have concluded that they cannot achieve per capita GHG reductions greater than 18 percent below 2005 levels by 2035 through the SCS planning process unless Sacramento implements significant regulatory reforms.[1020] Suggested reforms include new regulatory programs that authorize MPOs to implement road and parking pricing strategies and mileage-based user fees to offset declining gas tax revenues, as well as additional state funding of transit, ridesharing and non-motorized transportation programs.[1021]

The big four MPOs' conclusions regarding the limited ability of integrated transportation and land use planning to reduce GHG emissions is mirrored by recent research. The winter 2017 edition of the Journal of the American Planning Association includes a report by Associate Professor Mark Stevens of the University of British Colombia that uses meta-regression analysis to synthesize the findings of 46 different studies that include quantitative estimates of the influence of compact development patterns on driving behaviors.[1022] Based on this analysis, Dr. Stevens determined "that compact development does appear to reduce driving, but that the magnitude of that reduction is generally small".[1023] Other recent studies have found that per capita GHG emissions tend to be comparable as between suburban and urban core residents, or even decline with distance from the urban core out to the surrounding suburbs.[1024] Moreover, the ability to move people between their homes and jobs using public transit modes is particularly challenging in the Los Angeles metropolitan area, where only 7 percent of jobs are accessible by transit.[1025] In addition, the recent emergence of significant ZEV vehicle use, ride-sharing providers like Uber and Lyft, and flexible stay-at-home employment policies (e.g., telecommuting) are changing regional auto use in ways that

1018 *Ibid.*
1019 *Ibid.*
1020 *Ibid.*
1021 *Ibid.*
1022 Stevens, M.R. 2017. Does Compact Development Make People Drive Less? *Journal of the American Planning Association*. 83(1): 7-18. Chicago, IL: American Planning Association. https://www.researchgate.net/publication/309890412_Does_Compact_Development_Make_People_Drive_Less.
1023 Stevens 2017, p. 15
1024 Kotkin, J., Cox, W., Schill, M., Modarres, A (Kotkin et al.). 2015. Building Cities for People (p. 43). Chapman University Press. Orange, CA. https://www.chapman.edu/wilkinson/_files/citiesforpeople11116.pdf.
1025 Owen, A., Murphy, B., Levinson, D (Owen et al.). 2016. Access Across America: Transit 2015 (p. 4). Center for Transportation Studies, University of Minnesota. Minneapolis, MN. http://www.cts.umn.edu/Publications/ResearchReports/pdfdownload.pl?id=2740.

further limit the ability of, or are more effective than, relying on land use policy as a means of achieving GHG emission reductions from passenger vehicles.[1026,1027,1028,1029]

Given the adverse environmental and social impacts associated with Envision 2's high-density infill development pattern, it was expressly rejected by the SCAG Regional Council when it adopted the 2012 RTP/SCS in April 2012.[1030] In June 2012, CARB certified that implementation of the 2012 RTP/SCS would achieve and exceed the 2020 and 2035 GHG reduction targets applicable to the SCAG region.[1031,1032] That same month, the Federal Highway Administration and the Federal Transit Administration, in consultation with the U.S. Environmental Protection Agency, CARB and the regional air quality management districts, determined that the 2012 RTP/SCS was in conformance with the applicable State Implementation Plan (SIP) prepared in accordance with the Clean Air Act to establish control measures necessary to achieve attainment of National Ambient Air Quality Standards (NAAQS) in the SCAG region.[1033,1034] Accordingly, all federal and state expert agencies with regulatory jurisdiction over air resources in the SCAG region have determined that, if implemented, the 2012 RTP/SCS would achieve targeted per capita GHG emissions reductions from passenger vehicles and will not impede or conflict with regional efforts to reduce criteria air pollutants to acceptable levels.

As required by SB 375, in April 2016, SCAG updated 2012 RTP/SCS with its adoption of the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS).[1035] The 2016 RTP/SCS sets forth the same balanced land use plan described in the 2012 RTP/SCS, including its land use and transportation strategies, investments, and

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1026 Fitzsimmons, E. 2017 (February 23). Subway Ridership Declines in New York. Is Uber to Blame? *New York Times*. New York, NY. https://www.nytimes.com/2017/02/23/nyregion/new-york-city-subway-ridership.html?_r=0.

1027 Kotkin et al. 2015

1028 Rodier, C., Alemi, F., Smith, D (Rodier et al.). 2015. Synergistic Integration of Transportation Demand Management Strategies (Land Use, Transit, and Auto Pricing) with New Technologies and Services (Battery Electric Vehicles and Dynamic Ridesharing) to Enhance Reductions In VMT and GHG. Mineta Transportation Institute. San Jose, CA. http://transweb.sjsu.edu/PDFs/research/1207-combining-transportation-demand-with-ridesharing-and-BEVs-to-reduce-GHG.pdf.

1029 Shared-Use Mobility Center. (SUMC) 2016. Shared Mobility and the Transformation of Public Transit: Research Analysis. American Public Transportation Association. Chicago, IL: SUMC. https://www.apta.com/resources/reportsandpublications/Documents/APTA-Shared-Mobility.pdf.

1030 Southern California Association of Governments (SCAG). 2012e (April). *Resolution No. 12-538-1: A Resolution of the Southern California Association of Governments Certifying the Final Programmatic Environmental Impact Report Prepared for the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (SCH# 2011051018); and Adopting Environmental Findings, a Statement of Overriding Considerations and a Mitigation Monitoring and Reporting Program Pursuant to the California Environmental Quality Act.* Los Angeles, CA: SCAG.

1031 California, State of, California Air Resources Board (CARB). 2012. *Executive Order G-12-039 Southern California Association of Governments (SCAG) Sustainable Communities Strategy (SCS) ARB Acceptance of GHG Quantification Determination.* Sacramento, CA: CARB. https://www.arb.ca.gov/cc/sb375/exec_order_scag_scs.pdf.

1032 California, State of, California Air Resources Board (CARB). 2012b (May). *Technical Evaluation of the Greenhouse Gas Emission Reduction Quantification for the Southern California Association of Governments' SB 375 Sustainable Communities Strategy.* Sacramento, CA: CARB. https://www.arb.ca.gov/cc/sb375/scag_scs_tech_eval0512.pdf.

1033 United States Department of Transportation, Federal Highway Administration (USDOT). 2012. Conformity Determination for SCAG's 2012 RTP/SCS and 2010/11 FTIP through Amendment No. 11-24. Sacramento, CA: USDOT. http://rtpscs.scag.ca.gov/Documents/2012/final/SCAGFF24_060412.pdf.

1034 United States Department of Transportation, Federal Highway Administration (USDOT). 2013. Conformity Determination for SCAG's 2012 RTP/SCS through Amendment 1 and the 2013 FTIP through Amendment No. 13-04. Sacramento, CA: USDOT. http://rtpscs.scag.ca.gov/Documents/2012/final/SCAGFF04_071513.pdf.

1035 SCAG 2016a

policies.[1036] The 2016 RTP/SCS also identifies new transportation investments to improve regional mobility, including new rail transit facilities, vehicle replacement programs, new funding for active transportation, bus system improvements, network maintenance projects, and highway and arterial improvement projects.[1037] Like its predecessor, and without opposition from the County, the 2016 RTP/SCS anticipates development of the Project site at densities consistent with the *Centennial Specific Plan.*.[1038,1039,1040] In addition, the 2016 RTP/SCS identifies the Northwest SR-138 Improvement Project (which is partially located within the Project's boundary and was recently approved by Caltrans) as a major regional highway project needed to improve regional access to opportunities such as jobs, education, recreation and healthcare.[1041,1042,1043] In June 2016, CARB determined that implementation of the 2016 RTP/SCS would achieve SCAG's per capita GHG reduction target of 8 percent by 2020 and would achieve an 18 percent per capita GHG reductions by 2035 (exceeding the SCAG 2035 target of 13 percent by five percentage points).[1044,1045] State and federal regulators also determined that the 2016 RTP/SCS conforms to the SIP and its control measures to reduce regional criteria pollutant emissions consistent with NAAQS.[1046,1047]

In *Center for Biological Diversity v. Department of Fish and Wildlife* (2015) 62 Cal.4th 2004 ("*Newhall*"), the California Supreme Court identified various compliance options that lead agencies can use when evaluating the cumulative significance of a proposed land use project's GHG emissions in CEQA documents, including project consistency with an adopted SCS. According to the Court, a lead agency need not analyze GHG emissions from cars and light trucks in CEQA documents for residential, mixed-use and transit priority projects that are consistent with an applicable SCS adopted pursuant to SB 375.[1048] As discussed above,

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1036 *Id.,* p. 69

1037 *Id.,* pp. 89, 94, 101

1038 Southern California Association of Governments (SCAG). 2015b (December). *2016-2040 Sustainable Communities Strategy (SCS) Background Documentation Appendix* (pp. 6, 7, 10, 11)*.* Los Angeles, CA: SCAG. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_SCSBackgroundDocumentation.pdf.

1039 Southern California Association of Governments (SCAG). 2016e (April). *2016-2040 RTP/SCS Public Participation and Consultation Sub Appendix Part 1 of 5 Comments and Responses Adopted April 2016* (p. 115). Los Angeles, CA: SCAG. http://scagrtpscs.net/Documents/2016/final/subAppendix01_2016fRTPSCS.pdf.

1040 DRP 2017, p. 6-8

1041 SCAG 2016a, p. 100

1042 Southern California Association of Governments (SCAG). 2017a (April). The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy Amendment #1 (p. 35). Los Angeles, CA: SCAG. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_amend01.pdf.

1043 Southern California Association of Governments (SCAG). 2017b (July). The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy Amendment #2 (p. 2). Los Angeles, CA: SCAG. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_amend02.pdf.

1044 CARB 2016

1045 California, State of, California Air Resources Board (CARB). 2016a (June). *Technical Evaluation of the Greenhouse Gas Emission Reduction Quantification for the Southern California Association of Governments' SB 375 Sustainable Communities Strategy.* Sacramento, CA: CARB. https://www.arb.ca.gov/cc/sb375/scag_final_staff_report_06_29_16.pdf.

1046 United States Department of Transportation, Federal Highway Administration (USDOT). 2016. Conformity Determination for SCAG's 2016 RTP/SCS. Sacramento, CA: USDOT. http://scagrtpscs.net/Documents/2016/notices/FHMW-FTA_2016RTPSCSConformityDetermination_2016-0601.pdf.

1047 United States Department of Transportation, Federal Highway Administration (USDOT). 2017. Conformity Determination for SCAG's 2016 RTP/SCS Amendment No. 1 and 2017 FTIP Consistency Amendment No. 17-03. Sacramento, CA: USDOT. http://www.scag.ca.gov/programs/Documents/16RTP_A1.pdf.

1048 *Newhall*, p. 230; *Cleveland National Forest Foundation v. San Diego Ass'n of Governments* (2017) 3 Cal.5th 497, 506-507

both the 2012 and 2016 RTP/SCS documents anticipate development of the Project to accommodate projected population and employment growth at levels consistent with the *Centennial Specific Plan*. Moreover, as discussed in Draft EIR Sections 5.8, Land Use, 5.9, Population and Housing, and 5.21, Climate Change, the Project is consistent with the 2016 RTP/SCS. Accordingly, the County is entitled to rely on such consistency as evidence that the Project will promote achievement of the region's per capita GHG emission reduction goals for passenger vehicle trips generated by the land use sector.

The General Plan and Antelope Valley Area Plan

As part of the RTP/SCS process, SCAG encourages its member cities and counties to ensure that their respective general plans consider and reflect RTP/SCS policies and land use strategies as appropriate. The current *Los Angeles County General Plan 2035* was adopted in October 2015.[1049] It was developed under five guiding principles: employ smart growth; ensure community services and infrastructure are sufficient to accommodate growth; provide the foundation for a strong and diverse economy; promote excellence in environmental resource management; and provide healthy, livable and equitable communities.[1050] These principles emphasize sustainability and help ensure that the needs of the existing and projected population are met without compromising economic, social, and environmental resources. In addition, to align with SCAG policies, the General Plan incorporates several key strategies, including the establishment of transit-oriented development areas coupled with multi-modal transportation systems.

The General Plan serves as the foundational document for community-based plans applicable to 11 unincorporated County planning areas, including the Antelope Valley Area Plan (AVAP) adopted in June 2015. The AVAP serves as the community plan applicable to the unincorporated area of the Antelope Valley, which covers a geographic area of 1,800 square miles, or 44 percent of the total County land area.[1051] The AVAP contains regional goals and policies pertaining to land use, housing, community design, circulation, pubic services and facilities, governmental services, environmental resource management, public safety, and energy conservation, among other topics. The AVAP updates and supersedes the 1986 Antelope Valley Areawide General Plan (AVAGP), the previous community plan applicable to the Antelope Valley planning area.[1052]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[1053] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[1054] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

[1049] DRP 2017, p. 5.8-7
[1050] *Ibid.*
[1051] *Id.,* p. 5.8-9
[1052] *Ibid.*
[1053] DRP 2015, p. I-5
[1054] *Ibid.*

As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals".[1055] At its core, the AVAP's Rural Preservation Strategy is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment".[1056]

The AVAP's Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development".[1057] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas (EOAs).[1058]

Per the AVAP, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[1059] Rural Town Areas serve as transition areas between Rural Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[1060] Rural Preserve Areas are located outside of Rural Town Centers and are largely undeveloped, unserved by existing or planned infrastructure and public facilities, and contain important environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[1061]

The Project site is located entirely within the AVAP's West EOA.[1062] Per the Rural Preservation Strategy, EOAs are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[1063] During the AVAP community planning process, EOAs "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to [EOAs] so that the areas around them can be preserved and maintained at low density, or agricultural uses".[1064]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure".[1065] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in EOAs so as to generate property tax revenues and developer fees needed to help fund new

1055 *Id.,* p. I-5
1056 *Id.,* p. I-6
1057 *Id.*, p. I-7; DRP 2014a, p. 7-7
1058 *Ibid.*
1059 DRP 2015, p. I-7
1060 *Ibid.*
1061 *Ibid.*
1062 DRP 2017, p. 4-4
1063 DRP 2015, p. I-8
1064 *Ibid.*
1065 *Id.,* p. I-8

infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[1066] To ensure that this strategy is implemented, the AVAP specifies that the interpretation of [AVAP] policy should be governed by the AVAP's Rural Preservation Strategy.[1067]

The planning policies and environmental benefits of the Rural Preservation Strategy are closely aligned with the regional land use policies described in the 2012 and 2016 RTP/SCS documents. For example, the AVAP reduces the projected number of new residential housing units in the planning area by 62 percent and locates more housing units closer to jobs, as compared to the 1986 AVAGP it replaces.[1068] As a result, implementation of the AVAP would generate just 17,065,721 vehicle miles traveled (VMT), a 50 percent reduction below the 33,787,619 VMT generated by the 1986 AVAGP.[1069] Moreover, implementation of the AVAP would convert to urban use only 6,169 acres of undeveloped agricultural land, compared to the 24,433 acres of agricultural land that would be converted under the 1986 AVAGP.[1070] Finally, as compared to the 1986 AVAGP, the AVAP greatly expands the boundaries of Significant Ecological Areas within the planning area and specifically provides for greater protection of wildlife movement corridors.[1071] Thus, the AVAP substantially limits the potential for "urban sprawl" development patterns in the Antelope Valley by focusing new development into compact and sustainably designed mixed-use EOA communities that place houses in close proximity to jobs and commercial uses while expanding SEA boundaries and preserving wildlife movement corridors and agricultural land.[1072]

The Project is Consistent with the "Smart Growth" Strategies of the RTP/SCS and Antelope Valley Area Plan and is not "Sprawl" or "Leapfrog Development."

According to SCAG, "'smart growth' is a term that covers a range of development and conservation strategies that help protect the natural environment and make communities more attractive, economically stronger, and more socially diverse".[1073] The Commenter's claim that the Project represents "classic sprawl" because the average trip length for project-generated traffic will be 25.5 miles disregards the fact that the Project is consistent with, and implements, regional and County plans to strategically locate future growth in a manner that both achieves statewide GHG reduction goals and relieves the potential adverse and social effects of focusing too much future growth in both agricultural areas and in infill, transit oriented areas. As discussed below, the Project is specifically designed to protect the natural environment by implementing an attractive and compact development pattern that places homes near jobs and commercial uses, all connected by a multi-modal circulation system that will reduce VMT and, by extension, GHG emissions.

1066 *Ibid.*
1067 *Ibid.*
1068 DRP 2014a, p. 7-7
1069 *Ibid.*
1070 *Ibid.*
1071 *Id.,* p. 7-8
1072 *Id.,* p. 7-7
1073 SCAG 2015, p. 3.11-11

This comment's implied assumption is that the ideal regional development pattern is one that only permits new growth in urban infill locations. As discussed above, however, regional planners and decision makers have determined that the over-densification of the urban core will disproportionately burden affected urban communities with a variety of environmental and social ills and that a balanced development pattern best serves the region as whole. As explained in the 2012 RTP/SCS, under its balanced land use plan, "many people in the region will continue to live in suburban neighborhoods and drive alone to work, school, shopping and other destinations – rather than use public transit and other transportation options. The 2016 RTP/SCS will not change how everyone gets around, but the Plan is designed to offer residents more choices so that we can experience regionwide benefits".[1074] Indeed, the 2016 RTP/SCS assumes that, under its balanced land use plan, approximately 20 percent of regional trips will exceed 25 miles in length.[1075]

The terms "urban sprawl" and its cousin "leapfrog development" are ambiguous as they are frequently used to describe a variety of conditions, such as a specific type of land use pattern or the aesthetic quality of urban and suburban development forms. However, "leapfrog development" is often understood to refer to the development of land in a manner requiring the extension of public facilities from their existing terminal point through intervening undeveloped areas where such extension is not provided for in the existing plans of the local governing body.[1076] And "sprawl" is typically understood to mean "'uncoordinated growth': the expansion of community without concern for its consequences; in short, unplanned, incremental urban growth which is often regarded as unsustainable".[1077] Per these definitions, the Project is neither sprawl nor leapfrog development.

The Project site is situated near the junction of Interstate 5 and the Northwest SR-138 Improvement Project, which links western Los Angeles County and the major communities of Palmdale and Lancaster to the east.[1078] Thus, the Project site will not require major offsite roadway extensions to provide access to regional freeways. As shown on Draft EIR Exhibit 4-18, there are existing gas, power and telecom transmission facilities to serve the Project located on or immediately adjacent to the Project site. The Project will also construct two on-site wastewater treatment and recycled water distribution facilities to minimize potable water demand to treat Project wastewater and supply recycled water to the Project site.[1079] To ensure adequate potable water service, the Applicant/Developer will design, permit, finance, and construct an on-site water treatment plant adjacent to the West Branch of the California Aqueduct, which is located on-site.[1080] School, fire, police, emergency medical and library facilities needed to serve the Project will all be constructed on site, and in some cases will be available to also serve existing Mountain Communities in accordance with existing mutual aid agreements.[1081] Finally, none of the Project's backbone infrastructure will be sized to accommodate growth beyond that which is proposed by the

[1074] SCAG 2016a, p. 3
[1075] SCAG 2016a, p. 156
[1076] USLEGAL 2017
[1077] Batty et al. 2003, p. 1
[1078] DRP 2017, p. 4-2
[1079] *Id.,* p. 4-59
[1080] *Id.,* p. 4-55
[1081] *Id.,* p. 4-75

Project.[1082] Given its clustered development pattern and self-contained infrastructure improvements, the Project does not exhibit the characteristics of leapfrog development.

While there may be some intervening undeveloped land that separates the Project site from other urban areas in the Antelope Valley, the resulting development pattern is anticipated by, and is at the heart of, the AVAP's Rural Preservation Strategy. As explained in the AVAP, the Rural Preservation Strategy "creat[es] a pattern of rural town center areas, rural town areas, rural preserve areas, and economic opportunity areas. Each town in the Valley will flow outward from vibrant town centers that offer a range of housing and local-serving activities for day-to-day living. Lower density rural residences will surround these town centers, buffered by large contiguous open spaces that contain habitat areas, recreational spaces, and rural economic activities".[1083] This is precisely the "smart growth" clustered and mixed-use development pattern proposed by the *Centennial Specific Plan*, as demonstrated by its land use plan.[1084]

As discussed above, the 2016 RTP/SCS anticipates development of the Project site at densities commensurate with the *Centennial Specific Plan*. The *Specific Plan* is also consistent with "complete communities" land use policies described in the 2016 RTP/SCS. As envisioned by SCAG, "complete communities" are compact mixed-use districts that concentrate housing, employment, and a mix of retail and services located in close proximity to each other.[1085] As set forth in the *Centennial Specific Plan*, the Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers.[1086] The Project includes a mix of housing options within each Village, ranging from apartment homes close to the proposed Town Center to single-family homes in lower-density areas.[1087] A full range of light industrial, business, and other commercial uses are planned and will yield a broad range of employment opportunities, from retail services to large corporate employers.[1088] The opportunities for employment diversity increase the overall economic sustainability of the Project and the West EOA.

Centennial's unique land use plan is designed to incorporate the main principles of "smart growth" and thus promotes compact, transit-oriented, walkable, bicycle-friendly communities.[1089] The Town Center of Centennial is located in Village 3 and is the "downtown" area of the Project. Villages 1, 2, 5, and 7 have a Village Core.[1090] Villages 6, 8, and 9 have a Neighborhood Center. As shown in Draft EIR Exhibit 4-3, Centennial Project – Villages and Core Areas, 100 percent of all residential development will be located within ¼ mile walking distance of a park, trailhead, club house or other public amenity; and an 80

1082 *Id.,* p. 5.8-22
1083 DRP 2015, p. LU-2
1084 DRP 2017, Appendix 4.0-A, pp. 2-5, -16
1085 SCAG 2016a, p. 79
1086 DRP 2017, p. 4-10
1087 *Ibid.*
1088 *Ibid.*
1089 *Id.,* p. 4-16
1090 *Ibid.*

percent average, but no less than 50 percent of residential units will be located within ½ mile of a Village Core or the Town Center.[1091] Village Cores will have a public gathering space (e.g., square or plaza) of 10,000 square feet or more, with street frontage on at least one side and at least two points of access from a sidewalk, trail, or other pathway.[1092] The Town Center will have a public gathering space of 1 acre or more, with street frontage on at least two sides.[1093] Additionally, 30 percent of Village 3 residential units will be within the Town Center; and 15 percent of the residential units within Villages 1, 2, 5, and 7 will be within the Village Core.[1094] High-density residential uses will be located adjacent to commercial centers and the Specific Plan's Mixed-Use Overlay areas permit residential uses in commercial centers, to further integrate residential and retail uses.[1095] The Project also proposes to implement a community intranet system to provide easily accessible information to facilitate telecommuting and non-automotive transit mode use, further reducing demand for SOV travel.[1096] All of these design features encourage active transportation modes (e.g., walking and bicycling) and minimize use of single occupancy vehicles (SOV) for trips internal to the Project site.

The Project's Mobility Plan proposes a multi-modal transportation system with various components (Roadways, Transit, Bicycle, and Pedestrian) and is designed to provide safe and efficient mobility throughout the community.[1097] Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies.[1098] The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, cyclists, pedestrians, and transit riders.[1099] Non-motorized transportation planning elements are also integrated into the Centennial Circulation Plan to encourage non-automotive transit modes.[1100]

The Project's Mobility Plan further requires the formation and funding of a Transportation Management Agency (TMA) prior to the issuance of the Project's first occupancy permit.[1101] The TMA is responsible for monitoring the form of travel, or transit modes, used by the people who live and work in Centennial. Consistent with state and regional transportation, air quality and greenhouse gas planning objectives that focus on reducing SOV trips, Centennial must meet the following mobility performance standards: (1) a minimum of 20 percent of total daily peak morning and afternoon external (e.g., commuting) trips must

1091 *Id.,* p. 4-17
1092 *Ibid.*
1093 *Ibid.*
1094 *Ibid.*
1095 *Id.,* p. 4-20
1096 *Id.,* p. 4-35
1097 *Id.,* p. 4-30
1098 *Ibid.*
1099 *Id.,* p. 4-31
1100 *Ibid.*
1101 *Id.,* p. 4-30

be completed by using non-SOV transit modes; and (2) a minimum of 30 percent of total daily internal (e.g., local) trips must be completed by using non-SOV transit modes.[1102]

Consistent with the AVAP's Rural Preservation Strategy, the Project would ensure the preservation and management of natural resources and open space in and around the Project site. Specifically, no Project development would occur within the 3,866 acres of the San Andreas Significant Ecological Area (SEA 17) located on the Project site, which land would be permanently protected by a conservation easement provided by the Applicant/Developer.[1103] Additionally, approximately 39,213 acres of offsite open space and habitat, which includes 8,973 acres of SEA 17 land, would be permanently protected to mitigate the Project's onsite impacts to biological resources.[1104]

In addition, the Specific Plan's Green Development Program[1105] requires all development within the Specific Plan to incorporate environmentally sustainable development practices to conserve water, energy and natural resources, reduce and divert waste from landfills, and promote a healthier environment.[1106] In addition, to decrease the Project's dependence on carbon-based fuel consumption, a minimum of 50 percent of the anticipated electrical energy demand at build out (i.e. household, business, civic/institutional, recreational, and public facilities) shall be met by onsite renewable energy, and ZEV charging stations will be provided throughout the Project area.[1107]

Moreover, all buildings within the Specific Plan will be required to comply with state, regional, and local laws applicable to their design and construction including, without limitation, Pavley Motor Vehicle Standards (AB 1493); Low Carbon Fuel Standard;[1108] Title 24 (part 6 [Energy Code] and part 11 [CALGreen Code]) of the California Code of Regulations; Renewable Portfolio Standard (SB X1 2 and SB 350); Natural Gas Cooking Stoves and Fireplaces (SCAQMD Rule 445); Solid Waste Diversion (AB 939, AB 341, AB 1826, SB 1383); statewide reduction in potable urban water usage of 25 percent relative to water use in 2013 (Executive Order B-29-15); Model Water Efficient Landscape Ordinance (MWELO);[1109] California Water Code;[1110] EPA and NHTSA GHG and CAFE standards for passenger cars, light-duty trucks, and medium-duty passenger vehicles[1111] and for medium- and heavy-duty vehicles;[1112] Cap-and-Trade Program for Electricity, Stationary Sources, and Fuels;[1113] Advanced Clean Cars Program;[1114] Under Inflated Vehicle Tires;[1115] Heavy-Duty Vehicle

1102 *Ibid.*
1103 *Id.,* p. 4-43
1104 *Id.,* p. 4-44
1105 *Id.,* Appendix 2-A to Appendix 4.0-A
1106 *Id.,* p. 4-70
1107 *Id.,* p. 4-73
1108 CCR, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 7, Section 95480 et seq.
1109 *Id.,* Title 23, Division 2, Chapter 2.7
1110 *Id.,* Division 6, Part 2.10, Sections 10910–10915
1111 75 Federal Register (FR) 25324–25728 and 77 FR 62624–63200
1112 76 FR 57106–57513
1113 CCR, Title 17, Division 3, Chapter 1, Subchapter 10, Article 5, Section 95801 et seq.
1114 *Id.,* Title 13, Division 3, Chapter 1, Articles 1, 2, 6 (parts), Chapter 2, Articles 1, 2.1, 2.3, 2.4 (parts), Chapter 4.4 (parts), Chapter 8 (parts)
1115 *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 8, Section 95550 et seq.

Greenhouse Gas Emission Reduction Regulation;[1116] Management of High Global Warming Potential Refrigerants for Stationary Sources;[1117] Small Containers of Automotive Refrigerant;[1118] High-Global Warming Potential Greenhouse Gases in Consumer Products;[1119] Los Angeles Tree Planting Ordinance;[1120] Los Angeles Green Building Standards Code;[1121] and Los Angeles County Community Climate Action Plan.

In addition, the Project would be subject to Title 24 and CALGreen Code energy efficiency standards. However, as discussed in the Specific Plan and Section 5.21, Climate Change, the Project has committed to compliance with CALGreen voluntary measure A4.203.1.2.1 for low-rise residential buildings, resulting in buildings that would exceed 2016 Title 24 requirements by 15 percent (see PDF 11-3 in Section 5.11, Air Resources), and with CALGreen voluntary measure A5.203.1.2.1 for non-residential buildings and residential buildings taller than four stories, resulting in buildings that would exceed 2016 Title 24 requirements by 10 percent (PDF 11-2). Renewable energy produced on the Project site will be primarily rooftop solar, and a minimum of 50 percent of the Project's anticipated electricity demand must be satisfied from on-site renewable energy generation (PDF 21-3). With this approach, development within the Specific Plan will meet and exceed the standards of 2016 CALGreen Tier 1 as well as the requirements of the County's Green Building Ordinances.

Since all development within the new Centennial community is required to comply with the Green Development Program, as well as increasingly-stringent and innovative laws and regulations designed to conserve natural resources (such as water and preserved open space areas), and reduce GHG emissions and other pollutants, the Project presents the opportunity to create an innovative and environmentally sustainable community development from the beginning, and to incorporate green infrastructure measures throughout the community and in each of its Villages. As explained by the *Newhall* court, the County is entitled to rely on a showing of Project compliance with regulatory programs described above, which are all designed to reduce GHG emissions, as a CEQA "pathway to compliance" that demonstrates consistency with AB 32.[1122] This is particularly true here, since the Project will exceed regulatory requirements to further reduce associated GHG emissions, as discussed above.

Finally, the Project's carbon footprint is likely to decline over time. Technological advances and emerging practices and services related to sustainable community development and green building are rapidly advancing; as is the legal framework for removing barriers to innovation (e.g., with clear standards for recycled water), creating incentives for green practices and facilities (e.g., with continued federal and state support for distributed energy generation models such as rooftop solar), and changing public and private sector practices influencing longstanding transportation and employment behaviors (e.g., with on-demand car services and telecommuting). Continued technology innovations such as autonomous

[1116] *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 1, Section 95300 et seq.
[1117] *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5.1, Section 95380 et seq.
[1118] *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5, Section 95360 et seq.
[1119] *Id.,* Title 17, Division 3, Chapter 1, Subchapter 8.5, Article 2
[1120] Los Angeles County Code, Title 22, Division 1, Chapter 22, Part 20, Sections 22.52.2100 et seq.
[1121] *Id.,* Title 31, Chapter 1, Sections 100 et seq.
[1122] *Newhall*, 62 Cal.4th at 229

vehicles and battery-assisted bicycles and scooters, as well as continued public sector support for green practices that reduce greenhouse gas emissions and conserve water, and new private sector service models including flexible work hours and locations, are expected to continue. According to recent polling, 68 percent of Californians, including majorities across age and income groups, said they support the SB 32's ambitious GHG reduction goals, and 56 percent said they are willing to pay more for energy generated by renewable sources.[1123,1124] Given this political support, it is likely that state and local governments will continue to innovate with respect to GHG emission regulatory controls, and the Project will be required to comply with any applicable new laws as they are adopted.[1125]

For the reasons discussed above, the Project cannot fairly be described as "classic sprawl." As clearly demonstrated by its long planning history at the regional and County level, the Project is anything but "uncoordinated growth" undertaken without regard for its environmental consequences. The Project has been carefully designed to promote regional "smart growth" planning principles established by the 2016 RTP/SCS and the AVAP's Rural Preservation Strategy and will aid the County in its effort to accommodate its fair share of the regional housing need in a manner that reduces reliance on the automobile, reduces per capita GHG emissions, and promotes public health. The Project will also be required to implement an extensive list of Green Development design measures and to comply with and, in some cases exceed, applicable laws mandating efficient building design and construction. Finally, it will permanently preserve thousands of acres of sensitive habitat. By any measure, the Project is not "classic sprawl," particularly when viewed from a perspective that includes full consideration of regional planning priorities.

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

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United States Department of Transportation, Federal Highway Administration (USDOT). 2017. Conformity Determination for SCAG's 2016 RTP/SCS Amendment No. 1 and 2017 FTIP Consistency Amendment No. 17-03. Sacramento, CA: USDOT. http://www.scag.ca.gov/programs/Documents/16RTP_A1.pdf.

Response to Comment F.8-21:

This comment inaccurately describes the existing baseline used to analyze Project traffic impacts. First, the references in the comment to the approved Tejon Mountain Village and Grapevine Specific Plan projects in Kern County on page 5.10-34 of Draft EIR are included in a Draft EIR section entitled "Future Setting." As indicated by this title, the "Future Setting" section discusses the long-range cumulative setting used to analyze potential project impacts under future cumulative conditions, not the "traffic baseline" as suggested in the comment. The Draft EIR describes existing traffic conditions for the Project on pages 5.10-25 to 5.10-33. The approved Tejon Mountain Village and Grapevine Specific Plan projects are not included in the description of existing conditions because neither has been built. As required by CEQA, the Draft EIR includes an analysis of existing conditions plus the Project to focus on the specific impacts to existing traffic facilities that are attributable solely to the Project. As discussed in a recent California Supreme Court decision, *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, existing conditions normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The existing plus Project analysis is included in Draft EIR Section 5.10-33 to 5.10-88 and does not include the approved Tejon Mountain Village and Grapevine Specific Plan projects because neither has been built.

Potential Project impacts under future, cumulative conditions are discussed in the Draft EIR and in a Supplemental Traffic Study (STS) prepared in response to a request from Caltrans. As discussed in more detail in response to Comment F.8-17, in June 2017 Caltrans identified the Alternative 2 ("Alt 2") improvements as the preferred improvements for SR-138 in the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR"). In July 2017, Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR.

The Draft EIR and the STS analyze cumulative, future conditions with and without the Project to assess impacts to local and state highways from projected growth due to planned and reasonably likely developments in the region, plus the Project's full buildout traffic. These cumulative scenarios include the Tejon Mountain Village and Grapevine Specific Plan projects because they have been approved by Kern County, the CEQA lead agency, and have been included in applicable regional transportation plans. Both the Tejon Mountain Village and Grapevine Specific Plan projects are also included in the historic Tejon Ranch Conservation and Land Use Agreement (TRCRWA) between the Tejon Ranch Company (TRC) and Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy). The TRCRWA allows TRC and its development partners to pursue approvals for development of portions of the Tejon Ranch (Ranch), including the Project, the Tejon Mountain Village project and the Grapevine Specific Plan project, without opposition from the Resource Groups. The TRCRWA was executed in June 2008 and provides for the designation of Project open spaces and the dedication or sale

of conservation easements over approximately 240,000 acres, or approximately 90 percent, of the 270,000-acre Ranch.

The Commenter filed a lawsuit challenging the Tejon Mountain Village EIR that was denied in its entirely by the California Superior Court and Court of Appeals. There is no legal action pending against this project. The Commenter has filed a lawsuit challenging the Grapevine Specific Plan EIR, which was certified by Kern County in December 2016, and that action remains pending in the Superior Court. Under CEQA, an approved EIR is presumed valid after it has been certified.

There is no reasonable basis for assuming that the Tejon Mountain Village project and the Grapevine Specific Plan project, will not be built within the 20-year time frame of the Project's cumulative traffic analysis. The projects are both currently approved, are expressly allowed under the TRCRWA, and have been integrated with applicable Kern County land use and transportation plans, both of these projects have presumed buildout periods of approximately 20 years, during which time multiple additional agency approvals will need to be obtained. It is not reasonably foreseeable that these approved projects will not be built, and it would have been legal error for the Project cumulative traffic analysis to ignore these projects.

In summary, the baseline traffic analysis for the Project accurately reflects existing conditions and does not include the approved Tejon Mountain Village project and the Grapevine Specific Plan project because these projects have not been built and are not a component of the existing traffic setting. The cumulative, long-term traffic analysis for the Project accurately reflects reasonably foreseeable projects, and properly includes the approved Tejon Mountain Village project and the Grapevine Specific Plan project. An EIR for each of these projects has been certified, and the Commenter's legal challenges to the Tejon Mountain Village project were denied by the Superior Court and the California Court of Appeals. The Commenter's lawsuit challenging the Grapevine project EIR is pending and the certified EIR is presumed to be valid under CEQA. Both of the projects have been included in regional land use and transportation plans and are expressly allowed under the TRCRWA.

Response to Comment F.8-22:

This comment addresses growth projections used in the analysis of traffic impacts. As discussed in more detail in response to Comment F.8-17, in June 2017 Caltrans identified the Alternative 2 ("Alt 2") improvements as the preferred improvements for SR-138 in the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR"). In July 2017, Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR.

As discussed on Draft EIR pages 5.10-2 to 5.10-5, both the Project Draft EIR and the NW SR-138 FEIR use the North County Sub-Area Model to evaluate traffic conditions in north Los Angeles County. The Project Draft EIR utilizes a more recent version of the model that was updated by Los Angeles County to reflect the Antelope Valley Area Plan (AVAP) approved by

the County in June 2015. The STS also uses the traffic forecasts from the updated North County Sub-Area Model provided by the County to analyze potential Project and cumulative impacts. The updated model includes growth projections consistent with the AVAP designation of a Central Economic Opportunity Area (EOA) and an East EOA in addition to the West EOA in which the Project is located. Consequently, the updated North County Sub-Area Model reflects the most current information regarding potential future growth and related traffic conditions in the North County region.

As discussed in Section 1.2.4 of the Project traffic study (Draft EIR Appendix 5.10-A), growth assumptions in the updated North County Sub-Area Model were validated with respect to both the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the 2016-2040 RTP/SCS. The validation analysis confirmed that the updated North County Sub-Area Model assumptions are consistent with the 2012-2035 RTP/SCS for the Project area. As shown in the table below, the 2016-2040 RTP/SCS includes substantially similar housing and slightly higher employment growth projections for the Project area than the updated North County Sub-Area Model. The higher employment growth in the 2016-2040 RTP/SCS for the project area reflects the fact that the 2016-2040 RTP/SCS planning horizon extends to 2040 and the the updated North County Sub-Area Model planning horizon extends to 2035.

	Housing		**Employment**	
	2035	**2040**	**2035**	**2040**
North County Sub-Area Model	23,197	--	20,361	--
SCAG 2016-2040 RTP/SCS Model	--	23,138	--	24,240
Note: the above totals are for SCAG TAZs 2028000 and 20281000, which represents a geographical area larger than the Centennial project boundary. The North County Sub-Area Model is based on a 2035 horizon year, and the SCAG 2016-2040 RTP/SCS model is based on a 2040 horizon year.				

In addition, the validation analysis determined that the updated North County Sub-Area Model includes higher growth projections for the Central and East EOAs as contemplated by the approved AVAP. The lower level of Project-area employment and the higher level of growth in the Central and East EOAs in the the updated North County Sub-Area Model generally results in a higher volume traffic in the North County Area and therefore generates a more conservative analysis of potential Projects impacts than the 2016-2040 RTP/SCS model.

Finally, is it notable that, no party, including the Commenter, challenged the AVAP EIR's traffic analysis within the applicable statute of limitations, and therefore the AVAP EIR's traffic analysis is now "conclusively presumed to comply" with CEQA.[1126] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the EIR's traffic analysis. (Petition for Writ of Mandate, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. BS156932 [L.A. Cty. Sup. Ct. July 16, 2015]; Petitioner's Opening Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. Oct. 24, 2016]; Petitioner's Statement of Issues, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No.

[1126] CEQA § 21167.2

BS156932 [L.A. Cty. Sup. Ct. Oct. 24, 2016]; Petitioner's Reply Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. Jan. 18, 2017]). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[1127]

Consequently, the growth assumptions incorporated in the updated North County Sub-Area Model provide the current and applicable basis for analyzing potential Project traffic impacts.

Response to Comment F.8-23:

This comment inaccurately describes the distribution of internal and external trips and average trip lengths for internal, external and total trips in the traffic analysis. The referenced excerpt from Draft EIR page 5.10-49 is included in a paragraph discussing the Project's balanced land use plan, which will generate a range of housing options, onsite amenities, and a range of employment-generating land uses consistent with well-established planning goals encouraging the concurrent development of residential with non-residential uses. The Draft EIR also notes that sufficient facilities for non-work activities such as schools, parks, library facilities, and retail have been planned on the Project site in an effort to meet the needs of residents at buildout, reducing the need to access such services by making trips external to the Project. The purpose of this discussion is to demonstrate that, consistent with Los Angeles County and California policies, the Project has been designed to encourage local trips and to reduce incentives for trips external to the project for work, shopping and other activities. The Draft EIR does not in any way state, and the Project traffic analysis does not assume, that all onsite employment opportunities will be filled by local residents.

The immediately following paragraph on Draft EIR page 5.10-91 explains that the traffic analysis in fact assumes that a portion of the Project workforce and resident population will live or work outside the Project area and will commute to jobs outside or within the Centennial Specific Plan area. The analysis also assumes that on-site residents and workers will travel for services and amenities outside of the Project. The porportion of internal and external Project area trips was derived from the North County Sub-area Traffic Model updated by Los Angeles County to reflect the Antelope Valley Area Plan approved by the County in June 2015. The North County Sub-area Traffic Model used for the Project analysis is the same model used by the County and other public agencies for transportation planning studies in the region, including the 2015 AVAP and County General Plan update EIRs. The model was also used by Caltrans in the preparation of the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR").

As discussed on pages 5.10-49 to 5.10-51 of the Draft EIR, the Project analysis includes a discussion of internal and external "tripends" and "trips." Each "trip" includes two "tripends", a starting tripend and an ending tripend. A "tripend" refers to a trip start or destination point.

[1127] Ruling on Submitted Matter, Ctr. For *Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. May 22, 2017], at p. 13

An internal trip is a trip that both starts and ends within the Project site, and therefore has two internal tripends. An external trip is a trip with either a starting or ending point outside of the Project site, and therefore has just one internal tripend. An internal tripend can be a trip that either starts or ends in the Project site, such as from a residence or at a place of employment.

As discussed on Draft EIR pages 5.10-2 to 5.10-5, the Project Draft EIR uses the most recent version of the North County Sub-Area Model to evaluate traffic conditions in north Los Angeles County, including the Project site. This version of the model was updated by Los Angeles County to reflect the Antelope Valley Area Plan (AVAP) approved by the County in June 2015. Notably, no party, including the Commenter, challenged the AVAP EIR's traffic analysis within the applicable statute of limitations, and therefore the AVAP EIR's traffic analysis is now "conclusively presumed to comply" with CEQA.[1128] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the EIR's traffic analysis (Petition for Writ of Mandate, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. July 16, 2015]; Petitioner's Opening Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. Oct. 24, 2016]; Petitioner's Statement of Issues, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. Oct. 24, 2016]; Petitioner's Reply Brief, C*tr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. Jan. 18, 2017]). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[1129]

The updated North County Sub-Area Model used in the AVAP EIR affirmed by the Superior Court provides the estimates of Project internal trips and tripends utilized in the Draft EIR. As shown in Table 5.10-19 of the Draft EIR, the model projects that about 48 percent of the Project's total average daily trips (ADT) at buildout will be internal, and 52 percent will be external to the Project site. Accordingly, the model also projects that about 65 percent of the Project's full buildout total average daily tripends (the start or ending of a trip) will be related to trips internal to the site, and 35 percent will be related to trips that travel external to the site.

The proportion of trips and tripends that are projected to be internal and external to the Project site by the North County Sub-Area Model are based on model parameters such as population, employment and the relative distances between areas for which Project trips will be made. As discussed on Draft EIR page 5.10-50 the Project includes schools, parks, and retail shopping areas within the Project site located and sized to meet the Project's residential and workforce needs. The Project site is relatively isolated from other, similar amenities and most of the trips generated by travel to and from these locations will be internal to the Project area. In addition, at buildout, the Project will include approximately 10.1 million square feet (sf) of commercial office, shopping/retail, and industrial land uses

[1128] CEQA § 21167.2

[1129] Ruling on Submitted Matter, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 [L.A. Cty. Sup. Ct. May 22, 2017], at p. 13

that will provide approximately 23,675 jobs, many of which would be filled by future residents. In comparison, applicable traffic models for the Lancaster/Palmdale area, which is larger than the Project but also relatively isolated from other developed amenity and employment locations, project that 70 percent of all tripends are internal to the region.[1130] Similarly, traffic models indicate that 74 percent of the total tripends in the Santa Clarita Valley will be internal when the region is built out.[1131]

The North County Sub-Area Model estimates of the Project's average daily internal and external trips and tripends at buildout is also consistent with available census bureau data of the percentage of residents who work within or outside of their places of residence for communities with similar locational characteristics as the Project. The table below summarizes the 2011-2015 American Community Survey (ACS) 5-Year Estimates of the percentage of all workers aged 16 or older working in their places of residence, or internal to 11 communities that are relatively isolated from other employment locations and that have approximately the same average total workforce as the Project at full buildout.

	Total Workforce Over 16 Years of Age	**Percent Working in Own Community**
Santa Maria California	43,861	60%
El Centro California	15,368	57%
Tehachapi California	3,343	54%
Porterville California	18,810	53%
Barstow California	7,927	51%
Paso Robles California	14,771	48%
Madera California	18,525	46%
Lancaster California	53,503	46%
Watsonville California	22,271	45%
Santa Clarita California	84,987	37%
Palmdale California	55,867	32%
AVERAGE	**30,839**	**48%**
Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Table S0810		

The ACS data indicates that the percentage of workers that are employed in their place of residence ranges from 60 percent in Santa Maria, California to 46 percent in Lancaster, California and 32 percent in Palmdale, California. The average percentage of work within the place of residence for the 11 communities is 48 percent. As discussed on Draft EIR page 5.10-50, most of the Project trips will be generated by residential land uses, and an average single-family residential unit generates approximately nine home-based trips per day. About two of these nine trips are home-based-work trips related to travel directly to and from work. The remaining trips are related to travel between residential units for a non- work activity such as school, shopping, or recreation, which may be trips that are entirely local or may represent one leg of a journey between home and the workplace. The percentage of internal

[1130] Enhanced Antelope Valley Transportation Analysis Model Version 2.0, City of Palmdale
[1131] Santa Clarita Valley Consolidated Traffic Model Version 4.1, City of Santa Clarita and the County of Los Angeles

trips and tripends for non-work activity in locations such as the Project which provide schools, recreational facilities and shopping opportunities that are relatively far from other options is generally higher than for work-related trips. Residents in relatively isolated locations are more willing to utilize local school, shopping, and recreational facilities than to modify or change employment even if the desired work requires a significant daily commute.

The internal trip rate for the Project that results from the North County Sub-Area Model is approximately the same as the average internal trip rate for work commutes in the 11 communities in California included in the ACS data (48 percent). Since more daily trips in a community are related to non-work purposes, and the percentage of non-work internal trips is typically higher than for employment purposes, these data indicate that the North County Sub-Area Model internal and external trip estimates for the Project are reasonable.

The comment also incorrectly suggests that each Project trip will be 45.9 miles. As discussed on Draft EIR page 5.10-51, the North County Sub-Area Model results show that 40 percent of the trips made on-site would be 3 miles or less in length, and nearly 70 percent of all internal trips would be 4 miles or less. As shown in Table 3.8 of the traffic study,[1132] the North County Sub-Area Model results estimate that, on average, each internal Project trip will be 3.4 miles in length. The model estimates that an average external trip will be 45.9 miles in length. Finally, the North County Sub-Area Model estimates that 48 percent of all trips will be internal and 52 percent of all trips will be external to the Project. Consequently, the average Project trip is estimated to be 25.5 miles in length. As discussed on page 3-9 of Draft EIR Appendix 5.10-A, these estimated trip lengths are conservative because they do not reflect the trip reduction measures to be implemented by the Project that will encourage trips by walking, biking, and transit. The Lead Agency is entitled to rely on expert traffic model estimates as substantial evidence of a project's likely traffic impacts, including the air emissions associated with such traffic trips.[1133] The comment does not question the accuracy of the North County Sub-Area Traffic Model, or provide evidence that the model is unreliable.

The length of external trips estimated by the North County Sub-Area Model is not atypical of communities that are relatively far from other locations that provide comparable amenities, services and employment. In these instances, local work trips and non-work-related trips generally are shorter and internal to the community and non-local work trips are relatively longer to access external employment opportunities. The table below summarizes the 2011-2015 American Community Survey (ACS) 5-Year Estimates of the time of travel to employment for all workers aged 16 or older in 11 communities that are relatively far from other locations and that have approximately the same average total workforce as the Project at full buildout.

[1132] DRP 2017, Appendix 5.10-A

[1133] *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal* [1988] 47 Cal.3d 376, 410; *National Parks & Conserv. Ass'n v. County of Riverside* [1999] 71 Cal.App.4th 1341, 1362

	Total Workforce Over 16 Years of Age	Time of Travel to Work (minutes)	Percent Work Trips External to Place of Residence
Palmdale California	55,867	40.7	68%
Lancaster California	53,503	31.1	54%
Santa Clarita California	84,987	32.6	63%
Santa Maria California	43,861	20.6	40%
Barstow California	7,927	24.4	49%
Porterville California	18,810	22.5	47%
Madera California	18,525	23.6	54%
El Centro California	15,368	19.2	43%
Watsonville California	22,271	22.7	56%
Paso Robles California	14,771	21.5	52%
Tehachapi California	3,343	18.9	46%
Average	**30,839**	**25.3**	**52%**
Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Table S0810			

The ACS time of travel to work data for the 11 communities is generally consistent with the North County Sub-Area Model results for Project internal, external and average trips. The data show that, in locations such as Palmdale with a relatively high percentage of external work trips, trip times are comparatively high because a greater percentage of the residents in these communities commute to employment in other, relatively distant locations. The ACS data for Palmdale, for example, show daily work trips (32 percent internal and 60 percent external) average nearly 41 minutes. This result is consistent with the North County Sub-Area Model estimate that external Project trips, without accounting for the proportion of work trips that would be internal to the project, would average about 45.9 miles (e.g., about 45 minutes at an average of 60 miles per hour). The ACS data also indicate that, on average, a relatively isolated community in which 52 percent of work trips are external and 48 percent of work trip are internal would have an average commute time of about 25.3 minutes. This is consistent with the North County Sub-Area Model estimate that external Project trips would account for 52 percent of all trips, internal trips would comprise 48 percent of all trips, and that the average distance of all Project trips (internal and external) would be 25.5 miles (e.g., about 25 minutes at an average of 60 miles per hour).

The ACS data does not report the number of miles traveled to work within (internal to) and outside of (external to) a community. The ACS also does not report average trip to work travel speeds. The length of external trips to work for the 11 communities can be approximated using reported ACS data, however, by estimating the average internal trip length and the average work trip speeds. For example, if the average internal trip to work is assumed to be 8 miles (more than double the average Project internal trip length of 3.4 miles) and the average trip to work speed is assumed to be 55 miles per hour, the average external trip to work would be approximately 51 miles for Palmdale, 46 miles for Lancaster, and 43 miles for Santa Clarita. The average external trip to work for the 11 communities discussed above would be about 36.5 miles, and the average distance for all trips to work (internal and external) would be about 23.2 miles. If the average trip to work speed is

assumed to be 45 mph, the average external trip to work would be approximately 41 miles for Palmdale, 36 miles for Lancaster, and 34 miles for Santa Clarita. The average external trip to work for the 11 communities would be about 28.4 miles, and the average distance for all trips to work (internal and external) would be about 19 miles. These approximations are generally consistent with the North County Sub-Area Model estimated average trip lengths for the Project, including 45.9 miles for external trips and 25.5 miles for all trips.

In summary, the Project traffic analysis does not assume in any way as suggested in the comment that all onsite employment opportunities would be filled by Project residents. The average Project trip length is derived from the updated North County Sub-Area Model and is about 25.5 miles. The model indicates that internal trips, which account for 48 percent of the Project's total trips, will average about 3.4 miles in length. External trips, which account for 52 percent of the Project's total trips, will average about 45.9 miles in length. These estimates are consistent with internal tripend projections from applicable traffic models for the Lancaster/Palmdale and Santa Clarita Valley areas. The model results are also consistent with available information regarding internal, external and travel time to work from the 2011-2015 ACS 5-Year Estimates for 11 communities that with similar geographic characteristics and a comparable average workforce as the Project.

Response to Comment F.8-24:

This comment concerns potential future development that may substantially deviate from the balanced development described in the Draft EIR. As discussed in responses to Comments F.8-11 and F.8-12, The Draft EIR includes a Conceptual Phasing Plan implemented over a 20-year period.[1134] As summarized in Draft EIR Table 4-1, Centennial Project Overview, and on Draft EIR page 4-6, at full buildout the Project would include approximately 12,323 acres and would allow up to 19,333 dwelling units (du) on approximately 4,987 gross acres of land designated for residential uses. Other land uses include approximately 7,363,818 square feet (sf) of Business Park uses (office, research and development, and warehousing or light manufacturing uses) on approximately 597 gross acres; and approximately 1,034,550 sf of Commercial uses on approximately 102 acres. Proposed Institutional/Civic land uses (such as schools for higher education, medical facilities, library, and other civic uses) encompass approximately 1,568,160 sf on approximately 110 acres. The Project includes approximately 130,680 sf of Recreation/Entertainment uses (clubhouse, farmers market, childcare facilities, health clubs) on approximately 75 acres. Proposed sites for major utility facilities that would serve the entire community (e.g., wastewater reclamation facilities, water treatment facility, water bank, materials recovery facility) encompass approximately 191 acres, and Kindergarten through 12th grade (K-12 schools would be located on approximately 145 acres. Approximately 5,624 acres (approximately 45.6 percent) of the 12,323-acre Project site are proposed for Open Space for natural resource protection and greenways, and parks for active and passive recreational use.

Development within the Project site will require the preparation and implementation of TTMs for each phase and component of the Project. As discussed on Draft EIR page 4-92, the

[1134] DRP 2017, Exhibit 4-20; *Id.,* pp. 4-91 and -92

TTMs serve as the implementing mechanisms for Project land uses, and all TTM land uses must be consistent with the Centennial Specific Plan.[1135] Chapter 4 of the Specific Plan describes the processes and procedures for implementing the Specific Plan, including the processes and procedures for subsequent Project approvals such as future TTMs. Chapter 4 of the Specific Plan also establishes mechanisms that allow for flexibility in the development of the Project to respond to market conditions over the anticipated buildout of the Project while ensuring consistency with the purpose and intent of the Specific Plan. Specific Plan Section, 4.5.2 Discretionary Conformance Review, provides that significant modifications of the Specific Plan, including land use adjustments under Specific Plan Section 4.6, (Specific Plan Adjustment, Transfer, and Conversion Regulations) are subject to discretionary review and approval, including additional CEQA analysis as applicable.[1136]

Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to the Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code. As discussed in the California Bureau of Real Estate Reference Guide, the California Subdivision Map Act[1137] sets forth the conditions for approval of subdivision maps and requires enactment of subdivision ordinances by which local governments have direct control over the types of subdivision projects to be undertaken and the physical improvements to be installed. The primary objectives of the Act include the coordination of subdivision design (lots, street patterns, rights-of-way for drainage and sewers, etc.) with applicable plans and insuring that public improvements are properly completed to avoid undue burdens on the taxpayers of the community.[1138] The Los Angeles County Subdivision Ordinance was enacted in accordance with state law, and the approval of each future TTM for the Project must ensure compliance with the Specific Plan and that public facilities, including transportation improvements that meet Project demand under forecasted cumulative conditions, are implemented without resulting in undue burdens to County and other taxpayers.

The MMRP requires that Project traffic conditions and impacts be analyzed in conjunction with each TTM application. MM 10-2, for example, requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County. MMs 25 and 26[1139] require that the Project Applicant confirm that all Specific Plan traffic-related requirements, including the creating and operation of a Transportation Management Agency, the implementation of facilities and measures that encourage non-automotive transportation,

1135 Final EIR Appendix 4.0-A.Rev
1136 DRP 2017, Appendix 4.0-A, p. 4-8
1137 Government Code § 66410, et seq.
1138 California Bureau of Real Estate Reference Guide, Chapter 17, Subdivisions and Other Controls, available at http://www.dre.ca.gov/Publications/ReferenceBook.html.
1139 Final EIR, Appendix 2.0-C.Rev

and the implementation of Transportation Demand Management measures, prior to County approval of a TTM. Consequently, Project and local traffic conditions and the need for the implementation of applicable mitigation measures in the MMRP that identify improvements to local and state highway facilities will be evaluated as the Project is developed and TTMs are submitted for County review and approval. If the Project traffic evaluated in a TTM application deviates significantly from projected levels, the County has the authority deny the approval of any new TTMs and additional development until Project conditions are verified to be within projected levels, or a new project application, with new CEQA analysis, is reviewed and approved.

As discussed on Draft EIR pages 4-91 to 4-92, while the development of specific future phases and components of the Project will be based on the state of the economy, market demand for uses on the site and the timing of regional and off-site infrastructure, the Project land use approval process required by the Specific Plan, the implementation of the Subdivision Map Act by the County, and the MMRP ensure that future development will occur in a balanced pattern. As discussed above, Project development may only proceed after County approval of future TTMs. The TTM review and approval process requires an environmental evaluation to confirm that the Project's interim buildout (including the interim buildout of different categories of uses) does not cause any new or more significant adverse environmental impacts that were not evaluated in the EIR. The MMRP specifically requires that traffic studies be prepared and that Specific Plan transportation measures be confirmed in conjunction with each TTM application. In the event that, in the extreme hypothetical suggested by the comment, no employment generating uses occur with Project residential development, the environmental and traffic analysis required for each TTM would find that Project-related traffic differs from the traffic volumes and patterns considered in the Draft EIR. If these differences are found to generate new or more severe significant impacts, a subsequent EIR, additional public and agency review, and future feasible mitigation to avoid or reduce Project traffic-related impacts under the conditions documented during the TTM review and approval process would be required before any additional development is approved.

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

The notion that a large, mixed-use development with over 19,000 residential units could be developed without generating a single onsite job, as suggested in the comment, is highly unrealistic and purely speculative. The comment provides no evidence of any kind supporting the plausibility of such an outcome. Access to shopping, recreation, commercial activities and opportunities to work in close proximity with residential units are highly valued amenities that increase the desirability of and demand for housing units. In turn, these amenities require and stimulate demand for onsite employment. Consequently, residential developments have significant economic incentives to ensure that commercial and employment-generating land uses are implemented with housing in a balanced manner.

As discussed in responses to Comments F.8-11 and F.8-12, the fact that a project description and proposed phasing plan includes flexibility that may affect the timing of certain improvements is fully consistent with CEQA. The project description provides a stable and accurate summary of the proposed development, and the analysis of traffic impacts based on Project buildout is not unreliable because of Project phasing flexibility.

Response to Comment F.8-25:

This comment addresses the discussion of Project bicycle use. Contrary to the comment, the Project transporation analysis does not assume that any portion of the projected trips will occur by using bicycles. To provide a conservative analysis of potential Project impacts, all trips are assumed to occur by using automobiles.

The proposed Project bikeways are discussed on Draft EIR pages 4-35 to 4-36 and shown on Draft EIR Exhibit 4-8. The bikeways are part of the community trail system and include Class I Multi-use trails, Class II bikelanes, and Class IV protected bikeways. This network has been designed to allow the entire community to be accessible by bicycle. Pedestrian amenities throughout the community include trails that provide the shortest distance to goods and services within a ½ and ¼ mile of Village Core areas, slopes of 6 percent or less making it enjoyable and easy to walk, and the highest densities are located within ½ mile walk to Town Center and ¼ mile walk to Village Cores. The Project includes three grade-separated crossings over SR-138 to facilitiate access between the neighborhoods north of SR-138 and the. employment centers south of SR-138.

The Project analysis does not assume that any specific volume or percentage of trip will occur by bicycle. Instead, the Draft EIR provides information about the length and number of internal site trips that could be reasonably made by using bicycles or other non-automotive forms of transportation. The length of Project internal trips was estimated by the North County Sub-Area Model, which was updated by Los Angeles County to reflect the Antelope Valley Area Plan approved by the County in June 2015. As shown in Table 3.8 of the traffic study[1140], the North County Sub-Area Model results estimate that, on average, each internal Project trip will be 3.4 miles in length. Draft EIR page 5.10-51 states that 40 percent of total Project internal trips would be 3 miles or less in length, and that 70 percent of the Project's internal trips would be 4 miles or less. Four percent of the internal trips would be less than one mile. The Draft EIR indicates that trips of 3 miles or are a comfortable biking

[1140] DRP 2017, Appendix 5.10-A

distance that most people can make in less than 15 to 20 minutes. Although the Project will encourage the use of bicycles and other non-autmotive forms of transportation, and is required to ensure that 30 percent of internal trips are completed by alternative transit modes from single occupancy automobiles (see MM 10-25[1141]), the analysis of traffic and transporation impacts does not require or assume that a specific percentage of Project trips occur using bicycles.

With respect to the comment's references to hills and other potential bicycling deterrents, the development of electric bicycles has significantly increased the feasibility of bike commuting, even in hilly areas such as San Francisco. Electrical assist technology, which makes cycling and commuting easier, is expected to increase the demand for and use of bicycles as an option to single occupancy vehicles in the state over time.[1142] As discussed above, the Project includes a substantial network of bikeways that would allow for and encourage the use of conventional and electrical powered bicycles throughout the site.

Response to Comment F.8-25A:

The comment and cited document noted. As discussed in response to Comment F.8-25, the Project analysis does not assume that a specific proportion of trips will occur via bicycle.

Response to Comment F.8-26:

This comment does not accurately describe the reasons for and methodologies used in the analysis of (a) existing conditions plus Project traffic and (b) cumulative conditions plus Project traffic in accordance with CEQA requirements.

The text cited to Draft EIR page 5.10-53 in the comment is included in a paragraph that discusses the analysis of potential Project impacts under existing traffic conditions plus the full buildout traffic generated by the Project. As discussed in a recent California Supreme Court decision, *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, existing conditions normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The existing plus Project analysis of traffic impacts is utilized in EIRs prepared in accordance with CEQA to address the legal requirement for identifying how a proposed project will affect baseline physical conditions, including existing roadways and traffic loads, at applicable roadway segments, freeway ramps and segments, and at queuing points.

Consistent with these well-established CEQA principles and practice, the text on Draft EIR page 5.10-53 states that, the purpose of the existing plus Project analysis is to differentiate the significant impacts due only to the Project from the significant impacts that would occur from other traffic sources. The Draft EIR explains that, to conduct this analysis, the traffic that would be generated by the Project was directly added to existing traffic conditions. The Draft EIR further explains that, to provide a conservative analysis, the Project traffic

[1141] Final EIR, Appendix 2.0-C.Rev

[1142] See https://www.forbes.com/sites/bradauerbach/2017/01/16/electric-bikes-will-shape-the-future-here-is-a-company-already-underway/#57d5b2e87749.

forecasts do not assume that any Project trip reduction measures are implemented. In addition, the Draft EIR states that the existing plus Project analysis does not assume that any existing background traffic, including the implementation of any approved, planned or anticipated projects could increase roadway capacity and potential Project impacts. The statement cited in the comment refers to an assumption—the maintenance of existing facilities and traffic with no changes, such as new construction or redirected traffic patterns that—that increases the probability that the existing plus Project analysis will identify significant Project-related impacts. This assumption commonly utilized in EIRs and is appropriate for the analysis of existing plus Project impacts.

The text cited to Draft EIR page 5.10-88 in the comment occurs in a discussion of the analysis of potential Project impacts combined with cumulative traffic growth from non-Project sources, applicable regional transportation plans, and plus Project-related traffic growth. This analysis commonly referred to in EIRs as a "cumulative plus Project scenario" identifies how a proposed project, in combination with other non-project growth (typically forecasted by regional transportation agencies) will affect roadways and traffic loads at applicable roadway segments, freeway ramps and segments, and at queuing points. Page 5.10-88 of the Draft EIR states that the amount of traffic that would be generated under future conditions in developed areas outside the Project—the amount of forecasted non-Project cumulative traffic growth—would not change with or without the Project. Contrary to the comment, this statement means that the cumulative non-Project traffic growth forecasted in regional transportation plans will occur with or without Project development. It does not in any manner mean that cumulative traffic conditions are assumed to stay the same over time. The immediately subsequent text on Draft EIR page 5.10-88 discusses how the distribution, but not the amount, of future vehicle trips generated by non-Project growth would be affected without and with Project development. The cumulative plus Project analysis properly assumes that forecasted non-Project traffic growth will occur irrespective of Project development, and that the distribution of the non-Project cumulative growth will be affected if the Project is developed.

The same existing plus project and cumulative place project traffic analysis methodologies were used in the Antelope Valley Area Plan EIR certified by the County in June 2015. As noted on page 5.16-26 of the AVAP EIR, the existing plus project (AVAP buildout) scenario was prepared by "using the base year sub-area model. Increases in traffic volumes resulting from the [AVAP buildout] are compared to the existing roadway network capacity. No changes to land uses or the roadway network outside of the Project Area are included in this scenario." The AVAP EIR cumulative plus project (AVAP buildout) scenario "reflect[s] anticipated growth resulting from the [AVAP buildout]. Outside of the Project Area, land use and roadway network assumptions are consistent with Future Baseline Conditions" which means the cumulative non-AVAP-related traffic growth forecasted in regional transportation plans. Notably, no party, including the Commenter, challenged the AVAP EIR's traffic analysis within the applicable statute of limitations, and therefore the AVAP EIR's traffic analysis is now "conclusively presumed to comply" with CEQA.[1143] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the EIR's traffic

[1143] CEQA § 21167.2

analysis (Petition for Writ of Mandate, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. July 16, 2015); Petitioner's Opening Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Statement of Issues, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Reply Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. Jan. 18, 2017)). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[1144]

The portions of the comment that cite to the discussion of impacts to SR-138 on page 5.10-88 occur in the Draft EIR discussion of cumulative plus Project impacts to existing SR-138 facilities. Consistent with the Caltrans analysis of the need to improve SR-138 referenced in the comment, the Draft EIR analysis also shows that traffic on the existing two-lane SR-138 highway will exceed available capacity in several locations under cumulative conditions with and without the proposed Project. Pages 5.10-90 to 5.10-134 of the Draft EIR also discuss potential impacts to I-5, SR-14, and SR-99 that would occur and identify improvements that would avoid Project impacts to these facilities and SR-138 under cumulative plus Project conditions.

There is no inconsistency in the Draft EIR discussion of existing conditions in the existing plus Project analysis and cumulative conditions, including forecasted non-Project traffic growth, in the cumulative plus Project analysis. In the existing plus Project analysis, Project buildout traffic is added to existing roadway facilities and traffic in accordance with CEQA requirements. The existing plus Project analysis conservatively assumes no additional roadway construction or changes in existing traffic patterns that could increase the capacity to accommodate Project traffic. The cumulative plus Project analysis assumes forecasted non-Project cumulative traffic growth will occur (i.e., the forecasted growth will not be affected and will remain the same) with or without the Project. The Draft EIR correctly states that Project development would affect the distribution of the forecasted non-Project cumulative traffic growth because the Project would generate a new destination for inbound and outbound traffic.

The Draft EIR is also fully consistent with Caltrans' analysis of the need to improve SR-138 under forecasted cumulative conditions with or without the Project, including in the Northwest State Route 138 Corridor Improvement Project ("NW SR-138 project"). The Draft EIR discusses the NW SR-138 project, including SR-138 improvement alternatives, design, purpose and how the alternatives related to the Project's proposed circulation system in Section 4.0, Project Description, pages 4-39 to 4-41, Section 5.10, Traffic, Access, and Circulation, pages 5.10-34 to 5.10-36, and Section 7, Cumulative Impacts, pages 7-8 to 7-9. This information was based on the Draft EIR/EIS for the NW SR-138 project which was circulated for public review and comment in July 2016. A Notice of Completion and Availability for the Project Draft EIR was filed by the County on May 15, 2017 and the 60-day

[1144] Ruling on Submitted Matter, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. May 22, 2017), at p. 13

comment period began on May 17, 2017. As noted on Draft EIR page 4-41, the NW SR-138 project Draft EIR/EIS, Transportation Analysis Report (TAR) and Intersection Control Evaluation report (ICE Report) deferred the selection of a preferred SR-138 improvement alternative until the NW SR-138 project Final EIR/EIS ("NW SR-138 FEIR") was published. In June 2017, during the comment period for the Draft EIR, Caltrans issued the NW SR-138 FEIR and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR.

To incorporate Alt 2 into the Draft EIR analysis, the STS considers potential Project impacts: (a) utilizing the current SR-138 facilities; (b) utilizing the Alt 2 facilities described in the NW SR-138 FEIR; and (c) utilizing the Alt 2 facilities and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout. The STS identifies certain mitigation measure clarifications required to address the design details of Alt 2 and to connect the Project internal circulation system with the Alt 2 facilities. The STS determined that the implementation of Alt 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 FEIR and the Project Draft EIR.[1145] The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

The STS findings include the following:

- Under interim cumulative traffic conditions, the current SR-138 facilities would accommodate approximately 10 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[1146]
- Under existing traffic plus Project conditions, the implementation of Alt 2 would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[1147]
- Under interim cumulative traffic plus Project conditions, the implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[1148]

In summary, the analysis of existing plus Project and cumulative plus Project conditions in the Draft EIR and the STS conforms with all CEQA requirements. The Draft EIR analysis of the need for SR-138 improvements under future, cumulative conditions, is consistent with

[1145] Final EIR, Appendix 5.10-C, Sections 2.5 and 3
[1146] *Id.,* Appendix 5.10-C, Tables 3-3 and 3-4
[1147] *Id.,* Appendix 5.10-C, Tables 3-1, 3-2 and 3-9
[1148] *Id.,* Appendix 5.10-C, Tables 3-5 and 3-6

the Caltrans analysis of the need for these improvements, including in the NW SR-138 FEIR. The preferred alternative in the NW SR-138 FEIR has been incorporated into the Project traffic analysis in the STS. The Draft EIR and the STS do not include inconsistent assumptions about existing traffic conditions or cumulative traffic conditions in any traffic analysis scenario.

Response to Comment F.8-27:

This comment asserts that the Draft EIR traffic analysis uses improper thresholds of significance. Consistent with the current CEQA Guidelines, the Draft EIR uses traffic significance thresholds based on Level of Service (LOS) based on volume to capacity ratios. These LOS criteria are consistent with the thresholds used in Congestion Management Plan for Los Angeles County and correspond with performance criteria ranging from LOS A (highest level of performance) to LOS F (lowest level of performance). At the request of Caltrans, the analysis of existing plus Project conditions in the Draft EIR uses the Highway Capacity Manual (HCM) methodology, which identifies LOS levels on the basis of traffic density. The existing CEQA Guidelines specifically reference LOS criteria as thresholds for determining impact significance.

As discussed in the response to Comment F.8-17, Caltrans selected SR-138 improvement Alternative 2 (Alt 2") as the preferred alternative for implementing the Northwest State Route 138 Corridor Improvement Project ("NW SR-138 project") in the NW SR-138 project Final EIR/EIS ("NW SR-138 FEIR"). The NW SR-138 FEIR was issued in June 2017 during the comment period for the Draft EIR. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. The NW SR-138 FEIR evaluated impacts with reference to LOS thresholds using the HCM methodology. To be consistent with the NW SR-138 FEIR methodology, the STS also evaluates potential impacts using the same LOS thresholds and the HCM methodology.

The comment refers to potential revisions to the CEQA Guidelines concerning traffic impact thresholds that were proposed in discussion drafts by the California Governor's Office of Planning and Research (OPR) in August 2014 and revised in January 2016 to implement portions of Senate Bill (SB) 743 (Steinberg). SB 743 was signed into law in September 2013 to address transit-oriented infill projects, judicial review streamlining for environmental leadership development projects, and an entertainment and sports center in the City of Sacramento. The bill added *Public Resources Code* Section 21099(b)(1), which requires that OPR propose amendments to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects within transit priority areas (TPAs). The statute provides that these criteria may include vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated. SB 743 did not mandate which metric or methodology OPR should propose to use instead of LOS in or outside TPAs.

The OPR discussion drafts proposed to replace CEQA's current LOS significance thresholds with two new thresholds based on VMT and traffic inducement (i.e., the construction of any new capacity on existing highways or major roadways). The OPR proposal remains extremely controversial, especially outside major cities already served by transit, and with the goods movement industry and related manufacturing and agricultural producers in California who rely on adequate roadway capacity. The OPR proposal has not proceeded to the next administrative step required by SB 743, which is the commencement of formal rulemaking with a proposed new amendment to the CEQA Guidelines. The rulemaking process, once commenced, generally takes approximately one year to complete. CEQA Guideline revisions are also subject to challenge in CEQA lawsuits. For example, in *California Bldg. Indus. Assn. v. Bay Area Air Quality Mgmt. Dist.,* 62 Cal. 4th 369, 390 (2015) the court vacated portions of CEQA Guideline 15126.2(a) several years after it had been adopted. Contrary to the comment, the OPR discussion drafts currently remain as unimplemented and nonbinding policy proposals, not mandatory guidance. The 2016 OPR document is not, as stated in the comment an "Updated Guidance Document." As shown in the Commenter's own reference to the online version of the document (see Comment F.8-27A) the OPR clearly delineates the document as a "proposal." Section II page 7 of the document unambiguously states that "this document includes proposed additions to the CEQA Guidelines, which are found in Title 14 of the California Code of Regulations. Note, these additions, must undergo a formal administrative rulemaking process, and once adopted by the Natural Resources Agency, be reviewed by the Office of Administrative Law. [sic]"

For an approximately four-month period in 2016, Caltrans unexpectedly – with no public notice – advised its district offices to implement the OPR discussion draft proposal as though it was already required by law. Following significant controversy, including a critical hearing by the California Transportation Commission, Caltrans revised its guidance and removed directives to begin implementing the OPR Discussion Draft. At present, no state agency mandate exists to ignore CEQA's current LOS threshold of significance or to impose a new or alternative threshold of significance, including the VMT thresholds that have been discussed by the OPR. Notably, the NW SR-138 FEIR, which was issued by Caltrans in June 2017, evaluates impacts on the basis of the LOS thresholds in the existing CEQA Guidelines.

It should also be noted that local agencies may adopt their own thresholds of significance, provided these lead agency thresholds are supported by substantial evidence in the record. Los Angeles County has not adopted changes to the existing LOS-based CEQA significance thresholds. Consequently, the Draft EIR and the STS properly utilize the LOS thresholds in the CEQA Guidelines.

Response to Comment F.8-27A:

Comment noted. As discussed in response to Comment F.8-27, the referenced document is a discussion draft that has not been implemented through a formal rulemaking and has not modified in any manner the existing CEQA Guidelines thresholds for traffic impacts based on level of service (LOS) standards.

Response to Comment F.8-28:

As discussed on Draft EIR page 5.10-35 Caltrans considered widening SR-138 from I-5 to SR-1 in the 2004 North County Combined Highway Corridors Study. The study was not an EIR and was not a "project" subject to CEQA. The Draft EIR further explains that Caltrans initiated the Northwest 138 Corridor Improvement Project to expand on the North County Combined Highway Corridors Study and evaluate specific operational improvements for SR-138 from I-5 to SR-14. In July 2016, Caltrans released the Northwest State Route 138 Corridor Improvement Project Draft EIR/EIS (NW SR-138 Draft EIR). As noted by the Commenter in Comment F.8-17, in June 2017, during the comment period for the Project Draft EIR Caltrans released the NW SR-138 project Final EIR/EIS (FEIR) and identified Alternative 2 ("Alt 2") as the preferred improvement alternative for SR-138. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR.

The NW SR-138 Draft EIR and FEIR comply with CEQA and the National Environmental Policy Act (NEPA) and address potential air quality and climate change/greenhouse gas impacts associated with the improvements to SR-138. The Draft EIR accurately describes the North County Combined Highway Corridors Study referenced in the comment as a predicate study of SR-138 conditions subsequently pursued under the Northwest 138 Corridor Improvement Project. The NW SR-138 project was fully analyzed under CEQA and NEPA in the NW SR-138 Draft EIR and FEIR. As discussed in response to Comment F.8-22, the Project was included in the North County Sub-Area Model used in the NW SR-138 Draft EIR and FEIR. Contrary to the comment, the assertion that the 2004 North County Combined Highway Corridors Study did not address CEQA (and NEPA) topics that have been fully reviewed in the 2016 NW SR-138 Draft EIR and 2017 NW SR-138 FEIR is irrelevant to the Draft EIR discussion and the County's review and approval of the Project.

Response to Comment F.8-28A:

Comment noted. As discussed in response to Comment F.8-28, the referenced document is correctly described in the Draft EIR as an early study of SR-138 improvements by Caltrans. Caltrans subsequently initiated The Northwest 138 Corridor Improvement Project to expand on the referenced document and a full environmental analysis of the Northwest 138 Corridor Improvement Project, including traffic associated with the Project, has been prepared and certified.

Response to Comment F.8-29:

The portions of the Draft EIR that are referenced in the comment are part of a discussion of the lead agency's ability to ensure that improvements that are subject to the jurisdiction and control of another agency will occur. As discussed on page 5.10-30, the Draft EIR found that the Project mitigation measures would reduce traffic impacts to a less than significant level. The Draft EIR also discussed the fact that potential Project impacts would be significant and unavoidable if mitigation measures that reference state highway improvements are not

constructed by Caltrans because the County (as the Lead Agency) lacks jurisdiction and control and cannot mandate the construction of improvements to these facilities. Based on the County's lack of jurisdiction and control over State highway facilities, the Draft EIR determined that potential Project impacts that would be reduced to less than significant levels by state highway facility improvements would remain significant and unavoidable.

The finding that the need for mitigation that involves improvements to state highway improvements outside the jurisdiction and control of a lead agency results in significant and unavoidable impacts is common in EIRs prepared by cities and counties. Substantially the same finding was made by the County for the same CEQA impact in the Antelope Valley Area Plan Update EIR, which was certified in June 2015. With respect to state highway improvements identified in the AVAP EIR as mitigation for significant impacts, page 5.16-50 of the AVAP Draft EIR states that "inasmuch as the primary responsibility for approving and/or completing certain improvements lies with agencies other than the County (i.e., cities and Caltrans), there is the potential that significant impacts may not be fully mitigated if such improvements are not completed for reasons beyond the County's control (e.g., the County cannot undertake or require improvements outside of the County's jurisdiction or the County cannot construct improvements in the Caltrans right-of-way without Caltrans' approval). Therefore, Impact 5.16-1 would remain significant and unavoidable."

Notably, no party, including the Commenter, challenged the AVAP EIR's traffic analysis within the applicable statute of limitations, and therefore the AVAP EIR's traffic analysis is now "conclusively presumed to comply" with CEQA.[1149] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the EIR's traffic analysis (Petition for Writ of Mandate, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. July 16, 2015); Petitioner's Opening Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Statement of Issues, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Reply Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. Jan. 18, 2017)). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[1150]

Contrary to the comment, the Draft EIR in no way concludes that potential traffic impacts would be significant and unavoidable because they are physically infeasible or cannot be implemented. The EIR, including the Supplemental Traffic Study incorporating the preferred alternative for SR-138 improvements identified by Caltrans in the Northwest 138 Corridor Improvement Project Final EIR,[1151] detail improvements that are incorporated into the mitigation measures for the Project that reduce all potential Project significant impacts to less than significant levels. The sole basis for finding that certain Project impacts would

[1149] CEQA § 21167.2

[1150] Ruling on Submitted Matter, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. May 22, 2017), at p. 13

[1151] Final EIR Appendix 5.10-C

remain significant and unavoidable is, as determined by the County in the AVAP EIR, that the County lacks jurisdiction and control over State highway facilities sufficient to directly implement improvements to these facilities.

The Project mitigation measures require that applicable roadway improvements be implemented for Project development. MMs 10-3 and 10-4 require that the Project either fund these improvements by entering into an agreement with Caltrans (referred to as the Traffic Mitigation Agreement) or by contributing fair share funding for these improvements. As discussed in response to Comment F.8-11, and on Draft EIR page 4-92, the tentative tract map (TTM) review and approval process serves as the implementing mechanisms for Project land uses, and all TTM land uses must be consistent with the Centennial Specific Plan.[1152] Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to this Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code. As discussed in the California Bureau of Real Estate Reference Guide, the California Subdivision Map Act[1153] sets forth the conditions for approval of a subdivision map and requires enactment of subdivision ordinances by which local governments have direct control over the types of subdivision projects to be undertaken and the physical improvements to be installed. The primary objectives of the Act include the coordination of a subdivision's design (lots, street patterns, rights-of-way for drainage and sewers, etc.) with applicable plans and insuring that public improvements are properly completed to avoid undue burdens on the taxpayers of the community.[1154] The Los Angeles County Subdivision Ordinance was enacted in accordance with state law, and the approval of each future TTM for the Project must ensure compliance with the Specific Plan and that public facilities, including transportation improvements that meet Project demand under forecasted conditions, are implemented and funded without resulting in undue burdens to County and other taxpayers.

The Mitigation Monitoring and Reporting Program (MMRP)[1155] requires that Project traffic conditions and impacts be analyzed in conjunction with each TTM application. MM 10-2, for example, requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County. Consequently, the need for the implementation of applicable mitigation measures in the MMRP regarding improvements to local and state highway facilities, and the construction of measures required to address traffic conditions identified in each TTM traffic study, will be evaluated as the Project is developed and TTMs are submitted for County review and approval. If the state highway facilities required to

1152 Final EIR Appendix 4.0-A.Rev

1153 Government Code § 66410, et seq.

1154 California Bureau of Real Estate Reference Guide, Chapter 17, Subdivisions and Other Controls, available at http://www.dre.ca.gov/Publications/ReferenceBook.html.

1155 Final EIR Appendix 2.0-C.Rev

accommodate traffic conditions evaluated in a TTM application have not been funded and constructed as required by the MMRP, the County has the authority deny the approval of any new TTMs and additional development until these facilities are built, or a new project application, with new CEQA analysis, is reviewed and approved.

Contrary to the comment, the Draft EIR mitigation measures require that the Project provide applicable funding for all traffic facility improvements necessary to accommodate Project traffic over time. These improvements are feasible and have been identified in the Draft EIR, in the STS, in the NW SR-138 FEIR, and in the AVAP EIR. Consistent with well-established CEQA principles and practice, and with the findings in the AVAP EIR, the sole basis for determining that Project traffic impacts would remain significant and unavoidable is that Caltrans, and not the lead agency, has jurisdiction and control over the implementation of mitigation measures that reference state highway improvements. This finding is fully consistent with all applicable CEQA requirements.

Response to Comment F.8-30:

This comment does not accurately describe the Mitigation Monitoring and Reporting Program (MMRP) requirements for the Project.[1156] As discussed in more detail in response to Comment F.8-11, the tentative tract map (TTM) approval process serves as the implementing mechanism for Project land uses, and all tentative map land uses must be consistent with the Centennial Specific Plan.[1157] Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to this Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code.

Consistent with these requirements, the MMRP specifically links the evaluation of traffic and transit conditions, and the implementation of required improvements and other transportation-related measures, with the approval of each tentative map, As stated in the MMRP, for example, MM 10-2 requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County. As discussed in more detail in response to Comment F.8-15, MMs 10-25 and 10-26[1158] require that the Project Applicant confirm that all Specific Plan traffic-related requirements, including the creating and operation of a Transportation Management Agency, the implementation of facilities and measures that encourage non-automotive transportation, and the implementation of Transportation Demand Management measures, prior to County approval of a TTM. Consequently, Project and local traffic conditions and the need for the implementation of applicable mitigation measures in the MMRP that identify improvements to local and state highway facilities will

[1156] Final EIR Appendix 2.0-C.Rev
[1157] DRP 2017, Appendix 4.0-A.Rev
[1158] Final EIR Appendix 2.0-C.Rev

be evaluated as the Project is developed and TTMs are submitted for County review and approval. If the Project traffic evaluated in a TTM application deviates significantly from projected levels, the County has the authority deny the approval of any new TTMs and additional development until Project conditions are verified to be within projected levels, or a new project application, with new CEQA analysis, is reviewed and approved. MM 10-2, as cited in the comment, is fully enforceable and provides the necessary linkage between the TTM process and the evaluation and implementation of all transportation facility improvements that will meet the Project's transit and transportation demand and objectives during the buildout process.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS (NW SR-138 FEIR) and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR.

To incorporate Alt 2 into the Draft EIR analysis, the STS considers potential Project impacts: (a) utilizing the current SR-138 facilities; (b) utilizing the Alt 2 facilities described in the NW SR-138 FEIR; and (c) utilizing the Alt 2 facilities and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout. The STS identifies certain mitigation measure clarifications required to address the design details of Alt 2 and to connect the Project internal circulation system with the Alt 2 facilities. The STS determined that the implementation of Alt 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 FEIR and the Project Draft EIR (see Final EIR Appendix 5.10-C, Section 2.5 and Section 3). The STS also demonstrates that, using the Highway Capacity Manual methodology for consistency with the NW SR-138 FEIR, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR. The STS findings include the following:

- Under interim cumulative traffic conditions, the current SR-138 facilities would accommodate approximately 10 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[1159]
- Under existing traffic plus Project conditions, the implementation of Alt 2 would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[1160]

[1159] Final EIR Appendix 5.10-C, Tables 3-3 and 3-4
[1160] *Id.,* Appendix 5.10-C, Tables 3-1, 3-2 and 3-9

- Under interim cumulative traffic plus Project conditions, the implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[1161]
- Under long-range cumulative traffic plus Project conditions, the implementation of Alt 2 and additional SR-138 improvements would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[1162]

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

- To connect the Project circulation system to the Alt 2 facilities, an additional intersection and certain intersection upgrades, such as additional lanes, will be constructed at locations where SR-138 borders the Specific Plan boundary.[1163]
- The implementation of Alt 2, including minor modifications in certain intersection locations within the Specific Plan area to accommodate the Alt 2 design details, that accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative traffic conditions.[1164]
- SR-138 improvements in addition to Alt 2 that would be required to accommodate all of the Project's buildout traffic under the long-range cumulative traffic conditions projected in the Draft EIR and STS.[1165]

As discussed in the STS,[1166] and as included in response to Comment F.8-17, the Project's mitigation measures have been clarified to reflect the implementation of these improvements with Alt 2.

1161 *Id.,* Appendix 5.10-C, Tables 3-5 and 3-6
1162 *Id.,* Appendix 5.10-C, Table 3-7, Tables 3-8 and 3-9
1163 *Id.,* Appendix 5.10-C, Sections 2.2 and 2.3
1164 *Id.,* Appendix 5.10-C, Section 2.1
1165 *Id.,* Appendix 5.10-C, Section 2.4
1166 *Id.,* Appendix 5.10-C, Section 5

In accordance with the MMRP, the Project must provide the required funding for the implementation of all roadway and highway improvements, including the Project's fair share of the costs of implementing Alt 2, and additional improvements as confirmed in subsequent TTM traffic studies that may be required for cumulative conditions with full project buildout, prior to the approval of development that would utilize these facilities. MMs 10-3 and 10-4 require that the Project either fund these improvements by entering into an agreement with Caltrans (referred to as the Traffic Mitigation Agreement) or by contributing fair share funding for these improvements. If the Project and Caltrans implement an improvement agreement, the required improvement funding must occur in accordance with the agreement and the funds must be paid to Caltrans prior to final map recordation for the Project (see references to "Prior to Final Map recordation" and "In accordance with the Traffic Mitigation Agreement" in the column titled, "When Monitoring to Occur" for MM 10-3[1167]). Alternatively, the Project is required to pay the fair share costs of each improvement prior to final map recordation (see reference to a "Prior to Final Map recordation" in the column titled, "When Monitoring to Occur" for MM 10-4[1168]).

These requirements are carried forward for each specific improvement to state highway systems, including to SR-138 and I-5, for the implementation of Alt 2 and additional improvements as confirmed in subsequent TTM traffic studies that may be required for cumulative conditions with full project buildout. As discussed in the STS and in more detail in response to Comment F.8-17, for example, MMs 10-6 to 10-23 address SR-138 improvements and MMs 10-34 to 10-41 address improvements to I-5 facilities. These and other MMRP improvements would, as discussed in Draft EIR Section 5.10 and the STS, fully mitigate all potential Project significant impacts to SR-138 other state highways. In each case the MMRP specifically requires that Project funding be provided either in accordance with the agreement with Caltrans and in accordance with the timing set forth in that agreement, or prior to final map recordation. The Project Applicant/Developer is the responsible agency or party identified in the MMRP for completing these requirements (see references to "Prior to Final Map recordation" and "In accordance with the Traffic Mitigation Agreement" in the column titled, "When Monitoring to Occur", "Comply with the terms of the Traffic Mitigation Agreement" and "pay fair share fees" in the column titled, "Action Required," and reference to "Project Applicant/Developer" in the column titled, "Responsible Agency or Party"[1169]). Consequently, all of the MMRP highway facility improvements required to address potential Project significant impacts are fully enforceable and must be completed before each phase of development may occur.

An analysis of the Project's fair share of the state highway facility improvements required by the MMRP is provided in Section 5.3 of the Draft EIR traffic study.[1170] The analysis uses the methodology for determining fair share funding set forth the Caltrans guidelines for the preparation of traffic impact studies of State facilities. As noted on page 5.8 of Draft EIR Appendix 5.10-A, the Caltrans guide specifically states that "The methodology [fair share calculation] is neither intended as, nor does it establish a legal standard for determining

1167 *Id.,* Appendix 2.0-C.Rev
1168 *Ibid.*
1169 *Ibid.*
1170 DRP 2017, Appendix 5.10-A

equitable responsibility and cost of a project's traffic impact…." Also, as discussed above, the NW SR-138 FEIR addressed several types of intersection configurations for each location, but defers selection of the final configurations to the SR-138 design phase. The precise amount that the Project will be required to pay as the fair share contributions to regional improvements is speculative and subject to change until the final design phase of SR-138 improvements are determined. The MMRP requires that the Project fund all applicable fair share highway improvements either in accordance with an agreement with Caltrans, which would identify the precise Project funding for each improvement in the agreement, or prior to the approval of final maps, which will require documentation of the final state highway system design costs and the Project's fair share of these costs, to the satisfaction of the County. The Project Applicant/Developer is solely responsible for funding the required improvements prior to subsequent approvals necessary to develop the Project irrespective of the applicable costs determined in accordance with MM 10-3 or MM 10-4.

Response to Comment F.8-31:

This comment does not accurately describe the Mitigation Monitoring and Reporting Program (MMRP) requirements for the Project,[1171] which obligate the Project Applicant/Developer to fund all required state highway improvements in accordance with MM 10-3 or MM 10-4 prior to subsequent approvals necessary to develop the Project. As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS (NW SR-138 FEIR) and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR.

To incorporate Alt 2 into the Draft EIR analysis, the STS considers potential Project impacts: (a) utilizing the current SR-138 facilities; (b) utilizing the Alt 2 facilities described in the NW SR-138 FEIR; and (c) utilizing the Alt 2 facilities and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout. The STS identifies certain mitigation measure clarifications required to address the design details of Alt 2 and to connect the Project internal circulation system with the Alt 2 facilities. The STS determined that the implementation of Alt 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 FEIR and the Project Draft EIR.[1172] The STS also demonstrates that, using the Highway Capacity Manual methodology for consistency with the NW SR-138 FEIR, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR. The STS findings include the following:

[1171] Final EIR Appendix 2.0-C.Rev
[1172] *Id.,* Appendix 5.10-C, Sections 2.5 and 3

- Under interim cumulative traffic conditions, the current SR-138 facilities would accommodate approximately 10 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[1173]
- Under existing traffic plus Project conditions, the implementation of Alt 2 would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[1174]
- Under interim cumulative traffic plus Project conditions, the implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[1175]
- Under long-range cumulative traffic plus Project conditions, the implementation of Alt 2 and additional SR-138 improvements would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[1176]

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

- To connect the Project circulation system to the Alt 2 facilities, an additional intersection and certain intersection upgrades, such as additional lanes, will be constructed at locations where SR-138 borders the Specific Plan boundary.[1177]
- The implementation of Alt 2, including minor modifications in certain intersection locations within the Specific Plan area to accommodate the Alt 2 design details, that accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative traffic conditions.[1178]

[1173] *Id.,* Appendix 5.10-C, Tables 3-3 and 3-4
[1174] *Id.,* Appendix 5.10-C, Tables 3-1, 3-2 and 3-9
[1175] *Id.,* Appendix 5.10-C, Tables 3-5 and 3-6
[1176] *Id.,* Appendix 5.10-C, Table 3-7, Tables 3-8 and 3-9
[1177] *Id.,* Appendix 5.10-C, Sections 2.2 and 2.3
[1178] *Id.,* Appendix 5.10-C, Section 2.1

- SR-138 improvements in addition to Alt 2 that would be required to accommodate all of the Project's buildout traffic under the long-range cumulative traffic conditions projected in the Draft EIR and STS.[1179]

As discussed in the STS,[1180] and as included in response to Comment F.8-17, the Project's mitigation measures have been clarified to reflect the implementation of these improvements with Alt 2.

In accordance with the MMRP, the Project must provide the required funding for the implementation of all roadway and highway improvements, including the Project's fair share of the costs of implementing Alt 2, and additional improvements as confirmed in subsequent TTM traffic studies that may be required for cumulative conditions with full project buildout, prior to the approval of development that would utilize these facilities. MMs 10-3 and 10-4 require that the Project either fund these improvements by entering into an agreement with Caltrans (referred to as the Traffic Mitigation Agreement) or by contributing fair share funding for these improvements. If the Project and Caltrans implement an improvement agreement, the required improvement funding must occur in accordance with the agreement and the funds must be paid to Caltrans prior to final map recordation for the Project (see references to "Prior to Final Map recordation" and "In accordance with the Traffic Mitigation Agreement" in the column titled, "When Monitoring to Occur" for MM 10-3[1181]). Alternatively, the Project is required to pay the fair share costs of each improvement prior to final map recordation (see reference to a "Prior to Final Map recordation" in the column titled, "When Monitoring to Occur" for MM 10-4[1182]).

These requirements are carried forward for each specific improvement to state highway systems, including to SR-138 and I-5, for the implementation of Alt 2 and additional improvements as confirmed in subsequent TTM traffic studies that may be required for cumulative conditions with full project buildout. As discussed in the STS and in more detail in response to Comment F.8-17, for example, MMs 10-6 to 10-23 address SR-138 improvements and MMs 10-34 to 10-41 address improvements to I-5 facilities. These and other MMRP improvements would, as discussed in Draft EIR Section 5.10 and the STS, fully mitigate all potential Project significant impacts to SR-138 other state highways. In each case the MMRP specifically requires that Project funding be provided either in accordance with the agreement with Caltrans and in accordance with the timing set forth in that agreement, or prior to final map recordation. The Project Applicant/Developer is the responsible agency or party identified in the MMRP for completing these requirements (see references to "Prior to Final Map recordation" and "In accordance with the Traffic Mitigation Agreement" in the column titled, "When Monitoring to Occur", "Comply with the terms of the Traffic Mitigation Agreement" and "pay fair share fees" in the column titled, "Action Required," and reference to "Project Applicant/Developer" in the column titled, "Responsible Agency or Party"[1183]). Consequently, all of the MMRP highway facility improvements required to address potential

1179 *Id.,* Appendix 5.10-C, Section 2.4
1180 *Id.,* Appendix 5.10-C, Section 5
1181 *Id.,* Appendix 2.0-C.Rev
1182 *Ibid.*
1183 *Ibid.*

Project significant impacts are fully enforceable and must be completed before each phase of development may occur.

An analysis of the Project's fair share of the state highway facility improvements required by the MMRP is provided in Section 5.3 of the Draft EIR traffic study.[1184] The analysis uses the methodology for determining fair share funding set forth the Caltrans guidelines for the preparation of traffic impact studies of State facilities. As noted on page 5.8 of Draft EIR Appendix 5.10-A, the Caltrans guide specifically states that "The methodology [fair share calculation] is neither intended as, nor does it establish a legal standard for determining equitable responsibility and cost of a project's traffic impact…." Also, as discussed above, the NW SR-138 FEIR addressed several types of intersection configurations for each location, but defers selection of the final configurations to the SR-138 design phase. The precise amount that the Project will be required to pay as the fair share contributions to regional improvements is speculative and subject to change until the final design phase of SR-138 improvements are determined. The MMRP requires that the Project fund all applicable fair share highway improvements either in accordance with an agreement with Caltrans, which would identify the precise Project funding for each improvement in the agreement, or prior to the approval of final maps, which will require documentation of the final state highway system design costs and the Project's fair share of these costs, to the satisfaction of the County. The Project Applicant/Developer is solely responsible for funding the required improvements prior to subsequent approvals necessary to develop the Project irrespective of the applicable costs determined in accordance with MM 10-3 or MM 10-4.

Response to Comment F.8-32:

As discussed in more detail in the responses to Comments F.8-30 and F.8-31, the Mitigation Monitoring and Reporting Program (MMRP)[1185] requires that the Project fund all applicable fair share highway improvements either in accordance with an agreement with Caltrans, which would identify the precise Project funding for each improvement in the agreement, or prior to the approval of final maps, which will require documentation of the final state highway system design costs and the Project's fair share of these costs, to the satisfaction of the County. The Project Applicant/Developer is solely responsible for funding the required improvements as a condition of subsequent approvals necessary to develop the Project irrespective of the applicable costs determined in accordance with MM 10-3 or MM 10-4. The Project's state highway funding and improvement obligations are fully enforceable under the MMRP, and no development could occur until these obligations have been met. Nothing in the Draft EIR or MMRP would permit in any manner an outcome, as the comment appears to suggest, that the Project would not fund its fair share of all required state highway improvements identified in the Draft EIR, the supplemental traffic study[1186] and in the MMRP.

[1184] DRP 2017, Appendix 5.10-A
[1185] Final EIR Appendix 2.0-C.Rev
[1186] *Id.,* Appendix 5.10-C

Response to Comment F.8-33:

The Commenter's opinion that environmental impacts related to SR-138 improvements discussed in the Draft EIR have not been evaluated is noted and this comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration. Traffic growth and facility improvements, including the expansion of SR-138 in the North County region under future conditions with the Project, have been evaluated in the Antelope Valley Area Plan Update EIR, which was certified by the County in June 2015 and in the Caltrans Northwest State Route 138 Corridor Improvement Project Final EIR/EIS (NW SR-138 FEIR) issued in June 2017. Both the AVAP EIR and the NW SR-138 FEIR used the North County Sub-Area Model to evaluate traffic impacts and to identify mitigation for traffic impacts, including the widening of SR-138, to accommodate future traffic growth with the buildout of the AVAP and North County area. As discussed in response to Comment F.8-22, the North County Sub-Area Model includes Project-related development and traffic growth. The Project is also included in and implements the AVAP for the West Economic Opportunity Area considered in the AVAP EIR.

Both the AVAP EIR and the NW SR-138 FEIR consider environmental impacts in accordance with CEQA Guidelines Appendix G. The AVAP EIR considered potential impacts to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, recreation, utilities and service systems, growth inducing impacts and alternatives to the proposed project in addition to transportation and traffic. The AVAP EIR found that all potentially significant impacts of the AVAP buildout would be mitigated to less than significant levels except for certain impacts to agricultural resources, air quality, biological resources, cultural resources, greenhouse gas emissions, mineral resources, and utilities and service systems. As discussed in response to Comment F.8-29, transportation and traffic impacts were also determined to be significant and unavoidable due to the County's lack of jurisdiction over mitigation that requires a combination of regional programs that are the responsibility of other agencies such as cities and Caltrans, The AVAP EIR also found that case-by-case mitigation would be required to determine specific physical, program and policy-level mitigation measures that would reduce the level of impacts below a significant level for specific development projects in the AVAP region.[1187]

Notably, no party, including the Commenter, challenged the AVAP EIR's traffic analysis within the applicable statute of limitations, and therefore the AVAP EIR's traffic analysis is now "conclusively presumed to comply" with CEQA.[1188] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the EIR's traffic analysis (Petition for Writ of Mandate, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. July 16, 2015); Petitioner's Opening Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Statement of Issues, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Reply Brief, *Ctr. For Biological Diversity v. Cty. of Los*

[1187] DRP 2014a, Section 6, p. 6-5
[1188] CEQA § 21167.2

Angeles, No. BS156932 (L.A. Cty. Sup. Ct. Jan. 18, 2017)). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[1189]

The NW SR-138 FEIR considered potential impacts to land use, growth, farmlands and timberlands, community impacts, utilities and emergency services, pedestrian and bicycle facilities, visual and aesthetics, cultural resources, hydrology and floodplain, water quality and storm water runoff, geology, soils, seismic and topography, paleontology, hazardous waste and materials, air quality, noise and vibration, energy, biological environment, climate change, growth inducing impacts and construction impacts as well transportation and traffic impacts. The NW SR-138 FEIR considered a no-build alternative, Build Alternative 1 (a freeway expressway facility for SR-138 between I-5 and SR-14) and Build Alternative 2 (an expressway – conventional highway facility for SR-138 between I-5 and SR-14). As noted above, the NW SR-138 FEIR identified Alternative 2 ("Alt 2") as the preferred improvements to SR-138. With mitigation, the NW SR-138 FEIR found that all potentially significant impacts would be reduced to less than significant levels except for impacts related to farmland conversion (NW SR-138 FEIR, Section 4). No lawsuits challenging the NW SR-138 FEIR were filed within the applicable statute of limitations, and therefore the FEIR is now "conclusively presumed to comply" with CEQA.[1190]

As discussed on page 5.10-35 of the Draft EIR, in July 2016, Caltrans released the draft Northwest State Route 138 Corridor Improvement Project EIR/EIS (NW SR-138 Draft EIR). Both the NW SR-138 Draft EIR and the Project Draft EIR analysis and traffic study[1191] considered the improvement of similar mainline segments and intersections along the SR-138 corridor. As discussed above and noted in Comment F.8-17, in June 2017, during the comment period for the Project Draft EIR, Caltrans released the NW SR-138 FEIR and identified Alternative 2 ("Alt 2") as the preferred improvement alternative for SR-138. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. The STS findings include the following:

- Under interim cumulative traffic conditions, the current SR-138 facilities would accommodate approximately 10 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[1192]

[1189] Ruling on Submitted Matter, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. BS156932 (L.A. Cty. Sup. Ct. May 22, 2017), at p. 13

[1190] CEQA § 21167.2

[1191] DRP 2017, Appendix 5.10-A

[1192] Final EIR Appendix 5.10-C, Tables 3-3 and 3-4

- Under existing traffic plus Project conditions, the implementation of Alt 2 would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.[1193]
- Under interim cumulative traffic plus Project conditions, the implementation of Alt 2 would accommodate approximately 75 percent of the Project's full buildout traffic without adversely affecting applicable LOS standards.[1194]

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

- To connect the Project circulation system to the Alt 2 facilities, an additional intersection and certain intersection upgrades, such as additional lanes, will be constructed at locations where SR-138 borders the Specific Plan boundary.[1195]
- The implementation of Alt 2, including minor modifications in certain intersection locations within the Specific Plan area to accommodate the Alt 2 design details, that accommodate approximately 75 percent of the Project's full buildout traffic under interim cumulative traffic conditions.[1196]
- SR-138 improvements in addition to Alt 2 that would be required to accommodate all of the Project's buildout traffic under the long-range cumulative traffic conditions projected in the Draft EIR and STS.[1197]

The STS identifies certain mitigation measure clarifications required to address the design details of Alt 2 and to connect the Project internal circulation system with the Alt 2 facilities.[1198] The STS determined that the implementation of Alt 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 FEIR and the Project Draft EIR.[1199] For example, Alt 2 includes a 6-lane Expressway from Gorman Post Road to 300th Street West and a 4-lane expressway from 300th Street West to 240th Street West. Under long-range cumulative condition traffic conditions with Project buildout, the Draft EIR and STS indicate that a 6-lane expressway may be required from 300th Street West to approximately 1/2 mile east of 250th Street West. The STS compared the impact area cross sections for the SR-138 6-lane and 4-lane expressway configurations considered in the NW SR-138 FEIR, and determined that the primary difference between these configurations is the presence of a third lane within the median area. The total area of impact and right-of-way requirement considered in the NW SR-138 FEIR is the same for both the 6-lane and 4-lane configurations on the applicable SR-138 segments. Based on the comparison of the NW SR-138 FEIR impact areas with the potential improvements in addition to Alt 2 that may be required to accommodate cumulative plus full buildout Project traffic, the STS confirms that, no new or

1193 *Id.,* Appendix 5.10-C, Tables 3-1, 3-2 and 3-9
1194 *Id.,* Appendix 5.10-C, Tables 3-5 and 3-6
1195 *Id.,* Appendix 5.10-C, Sections 2.2 and 2.3
1196 *Id.,* Appendix 5.10-C, Section 2.1
1197 *Id.,* Appendix 5.10-C, Section 2.4
1198 *Id.,* Appendix 5.10-C, Section 5
1199 *Id.,* Appendix 5.10-C, Sections 2.5 and 3

more severe significant impacts than considered in the Draft EIR, the NW SR-138 FEIR and the AVAP EIR would occur.

The Commenter's summary conclusion that the Draft EIR does not consider the effects of traffic mitigation, specifically with respect to habitat destruction, growth-inducing impacts, and impaired wildlife connectivity, are noted. The transportation improvements needed to serve the project, including the access points and potential Caltrans SR-138 right-of-way, were fully assessed in Section 5.7, Biological Resources, of the Draft EIR. The description of off-site areas studied[1200] includes "utilities and intersection improvements along SR-138" and refers to Exhibit 4-25. Close review of Exhibit 5.7-1 also reveals a baseline vegetation mapping layer for the SR-138 corridor as it moves throughout the Project area. The methodology within the wildlife movement discussion on page 5.7-55 similarly discusses the analysis of linkages through the area including "along SR-138." Page 5.7-78 of the Draft EIR goes on to discuss existing condition of wildlife movement with regarding to the hindrance of SR-18 specifically. The impact footprint reflecting SR-138 right-of-way is depicted in Exhibit 5.7-11a, 5.7-11b, 5.7-12, 5.7-13, 5.7-14, 5.7-15, and 5.7-16. Furthermore, Section 5.7.6 of the Draft EIR, Environmental Impacts (of biological resources), describes off-site impacts within each impact threshold discussion and indicates inclusion of SR-138. Consequently, the potential environmental impacts associated with mitigation measures that require improvements to SR-138 have been fully considered and meet all applicable CEQA requirements.

Response to Comment F.8-34:

The Draft EIR thoroughly analyzes the Project's potential to cause significant impacts from noise and vibration, and imposes a comprehensive suite of mitigation measures to ensure that any noise and vibration impacts are mitigated in compliance with CEQA. The Draft EIR's analysis is based on the Centennial Noise Study ("Noise Study"), conducted by noise experts Wieland Acoustics,[1201] noise monitoring data collected by BonTerra Psomas to establish baseline noise levels,[1202] the Centennial Specific Plan Traffic Study ("Traffic Study"), prepared by traffic experts Stantec Consulting Services, Inc.,[1203] and previously adopted analyses including but not limited to the County's 2015 EIR for its General Plan Update[1204] and the County's EIR for the Antelope Valley Area Plan EIR.[1205] On the basis of these technical studies and other evidence in the record, the EIR analyzes and mitigates the Project's potential noise and vibration impacts in compliance with CEQA.

Like many lead agencies, the County of Los Angeles has adopted specific thresholds of significance to analyze projects' potential noise impacts, adapted from Appendix G to the State CEQA Guidelines.[1206] CEQA vests the lead agency with substantial discretion in determining the appropriate threshold of significance to evaluate the severity of a particular

[1200] DRP 2017, p. 5.7-27
[1201] *Id.,* Appendix 5.12-A
[1202] *Id.,* Appendix 5.12-B
[1203] *Id.,* Appendix 5.10-A
[1204] DRP 2015
[1205] DRP 2014a
[1206] DRP 2017, pp. 5.12-20 and -21

impact.[1207] (See also *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1068 [explaining agency discretion to fashion significance thresholds].) As explained in the State CEQA Guidelines, "[t]he determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data. An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area."[1208] Accordingly, the Draft EIR analyzes the potential for the Project to cause any of six project-level impacts as established under the County's adopted criteria.

First, under Threshold 12-1, the Draft EIR analyzes the potential for the Project to "result in exposure of persons to, or generation of, noise in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies".[1209] The County General Plan and County Code establish a land use compatibility exterior noise standard of 65 dBA CNEL and an indoor noise standard of 45 dBA, based on the State General Plan Guidelines.[1210] These are common standards adopted by numerous other jurisdictions.[1211,1212] The County Code also establishes a set of noise regulations – one set for non-construction stationary noise sources, and a different set for construction activities – which impose time-of-day limitations on noise-producing activities, and a set of noise standards that vary based on time, day, activity and affected noise receptor.[1213] Lead agencies may rely on general plans and noise ordinances to develop and apply CEQA thresholds of significance for noise. (See *Nat'l Parks & Conservation Assn v. Cty. Of Riverside*, 71 Cal.App.4th 1341, 1353 (1999) [upholding EIR's use of county noise ordinance standard of 65 dB for assessing significance of project's noise impacts]; and *Sierra Club v. Tahoe Reg'l Planning Agency*, 916 F.Supp.2d 1098, 1146-1151 (E.D.Cal. 2013) [upholding significance threshold that limited hours during which construction could occur, but did not otherwise impose limit on construction noise because county's approach was consistent with noise ordinance]). More generally, it is well established that a lead agency may rely on existing applicable regulatory standards in assessing significance. (See, e.g., *North Coast Rivers Alliance v. Marin Mun. Water Dist.* (2013) 216 Cal.App.4th 614, 651 [upholding analysis of greenhouse gas emission based on consistency with county's emissions reduction goals]; *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 492-493 [upholding thresholds of significance for aesthetic impacts derived from city's local coastal program policies]; *Tracy First v. City of Tracy* (2009) 177 Cal.App.4th 912, 932-934 [upholding determination that energy impact of project was less than significant because the project achieved energy efficiencies greater than those required by California Energy Efficiency Standards]; *Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal.App.4th 74, 106 [upholding finding that incremental impacts of criteria pollutants on sensitive crops would be less than significant based on National Ambient Air

[1207] CEQA Guidelines, § 15064(b)
[1208] *Ibid*.
[1209] DRP 2017, p. 5.12-21
[1210] *Id.,* pp. 5.12-4, -5, -12, -13
[1211] *Id.,* p. 5.12-5, Table 5.12-1; *Id.,* Exhibit 5.12-1
[1212] *Id.,* Appendix 5.12-A pp. 8-14
[1213] *Id.,* pp. 5.12-6 to -9

Quality Standards promulgated to protect public health and welfare from adverse effects of a pollutant]; *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 932-934 [upholding use of thresholds of significance recommended by SCAQMD to assess air quality impacts]; and *Oakland Heritage All. v. City of Oakland* (2011) 195 Cal.App.4th 884, 896 [agency has discretion to rely on adopted standards to serve as significance thresholds for a particular project]).

Accordingly, impacts are considered significant under Threshold 12-1 if the exterior CNEL at proposed noise-sensitive land uses would exceed 65 dBA; if the interior CNEL would exceed 45 dBA in habitable rooms at proposed residences, hotels, schools, or places of worship (specified in the California State Building Code and County Building Code); if the noise levels generated by non-transportation (i.e., stationary) sources on the Project site would exceed the exterior limits specified in the County Code; or if construction activities would generate noise levels in excess of the County Code's construction noise standards.[1214] On the basis of the Noise Study, among other evidence, the Draft EIR concluded that compliance with the County Code would reduce these impacts to a less than significant level, and CEQA specifically permits a lead agency to rely on compliance with existing regulatory and enforcement measures when concluding that impacts can be mitigation to a less than significant level.[1215] In this case, the County has gone further by adopting significant additional mitigation to ensure that the Project will not create noise levels in excess of applicable standards. Specifically, MMs 4.12-1 and 4.12-2 require the Project Applicant/Developer to submit an Acoustical Study by an acoustical engineering expert, demonstrating that the Project has been designed to comply with applicable County standards, and where necessary to ensure compliance, has included design elements such as setbacks and noise barriers that are sufficient to meet the objective, fixed performance standard articulated in the County's noise standards. MM 12-3 also requires that the Project's construction activities comply with the County Code's construction noise requirements, and requires specific best management practices to minimize construction noise. Additionally, with implementation of MM 12-6, the Project Applicant/Developer shall provide prospective purchasers or tenants on the Project site a notice and statement of acknowledgment that the Centennial property will be undergoing continuing development which could result in noise impacts. Collectively, these measures would reduce potential impacts to a less than significant level.

Second, under Threshold 12-2, the Draft EIR analyzes the potential for the Project to "[r]esult in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels."[1216] The County Code prohibits vibration activities that exceed that exceed the vibration perception threshold (annoyance) of 0.01 particle velocity (ppv) inch per second (in/sec). Again, rather than merely rely on enforcement of this Code requirement, MMs 12-4 and 12-5 require the Applicant/Developer to proactively demonstrate that activities have been designed to comply with this standard, by submitting a vibration analysis to the County before vibration-causing activities can commence. MMs 12-4 and 12-5 specific alternative measures such as pile driving cushions or jetting that could be imposed to meet this

[1214] *Id.,* p. 5.12-21
[1215] *Oakland Heritage All.*, 195 Cal.App.4th at 896
[1216] DRP 2017, p. 5.12-34

performance standard if necessary. Although it is anticipated that any blasting would be limited and would occur at large distances from existing or future receptors, MM 12-7 also requires a blasting plan if blasting is anticipated within 1,000 feet of a residence or similar sensitive land use, which would require that the Blasting Plan be approved by appropriate County authorities and affected residents be notified.

Third, under Threshold 12-3, the Draft EIR considers the potential for the Project to "[r]esult in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project, including noise from parking area."[1217] The primary permanent noise increases associated with the Project are from increased traffic. CEQA does not define what constitutes a "substantial permanent increase in ambient noise levels," and the County Code also does not establish any specific requirement in this regard. Therefore, the County has substantial discretion in establishing criteria for this threshold.[1218,1219] In this case, the County has established a very conservative standard, classifying any permanent noise increase as "substantial" if Project-related traffic noise increases the ambient noise level at noise-sensitive locations by 5 dBA or more, *or* if traffic noise would increase the ambient noise level at noise-sensitive locations by 3 dBA or in areas where the ambient noise levels under With-Project conditions fall within the "Normally Unacceptable" or "Clearly Unacceptable" categories under the California's Noise/Land Use Compatibility State CEQA Guidelines. The County used this same standard in the County's EIR for its 2035 General Plan Update and its EIR for the Antelope Valley Area Plan.[1220,1221] This standard is much more conservative than the standard used by numerous other jurisdictions, including Caltrans.[1222]

Applying the County's significance criteria standard, again based on the expert technical analyses, the Draft EIR concludes that the Project would not cause any significant impacts under the 2035 Plus Project scenario at any location, with one exception. On SR-138 between Gorman Post Road and Old Ridge Route Road, where there is currently only a single adjacent residence, the Project would cause a 3.3 dBA increase in noise levels. The Draft EIR identifies specific feasible measures that are available to reduce this impact to a less than significant level: construction of a noise barrier at affected receptors or resurfacing the roadway with rubberized asphalt pavement.[1223] However, these mitigations would involve alterations to private property and/or within Caltrans' right-of-way, which are not in the County's or the Project Applicant's control. Since there are no feasible measures to reduce the significance of this impact that are within the County's jurisdiction to adopt, this impact is characterized as significant and unavoidable. CEQA explicitly authorizes a lead agency to find that the

1217 *Id.*, p. 5.12-21
1218 CEQA Guidelines, § 15064
1219 *Save Cuyama Valley*, 213 Cal.App.4th at 1068
1220 DRP 2014a
1221 LACDRP 2015
1222 See Caltrans 2017b, p. 283 ("According to the [California] Department [of Transportation]'s Traffic Noise Analysis Protocol for New Highway Construction and Reconstruction Projects, May 2011," an impact "substantially exceeds the existing noise level" when it causes a "12 dBA or more increase") (emphasis added); see also Noise Study, p. 14 (Kern County only requires achievement of the 65 dB outdoor/45 dB indoor General Plan standard).)
1223 DRP 2017, p. 5.12-45 and -46

appropriate mitigation measures for a particular impact "are within the responsibility and jurisdiction of another public agency and not the agency making the finding."[1224]

Fourth, under Threshold 12-4, the Draft EIR considers the potential for the Project to "[r]esult in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project, including noise from amplified sound systems."[1225] CEQA does not define what constitutes a "substantial temporary or periodic increase in ambient noise levels," and the County General Plan and County Code also do not specifically define the threshold for a "substantial" increase, so the County has used its discretion as lead agency to consider impacts significant under this criterion if construction or other temporary noise would exceed the construction noise standards in the County Code or General Plan. To mitigate this impact, the Draft EIR imposes MM 12-3, which requires compliance with the County Code's provisions regarding construction noise, and also requires best practices such as equipping construction with noise-reducing features and imposing noise abatement enclosures and equipment on stationary equipment.

Fifth, the Draft EIR considers Threshold 12-5 ("[f]or a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels"), but this threshold is not applicable because the Project is neither within an airport land use plan nor within two miles of any public or public use airport.[1226]

Sixth, under Threshold 12-6, the Draft EIR considers whether the Project would expose people residing or working in the Project area to excessive noise levels from a private airstrip. The Project is adjacent to the privately-owned Quail Lake Skypark, but this airport has only six locally based aircraft, and the Draft EIR concludes on the basis of reports from the Caltrans Division of Aeronautics, and analysis in the Noise Study, that the airstrip would not expose Project residents or workers to excessive noise levels.[1227]

Finally, the Draft EIR also analyzes the potential for the Project to cause cumulative noise impacts or growth-inducing noise impacts.[1228] For more information on cumulative noise impacts, please see responses to Comments F.8-40 through F.8-43.

It should be noted that many of the impact analyses and mitigation requirements contained in the Noise Section of the Draft EIR go beyond CEQA's requirements, since many of the analyzed impacts relate to the impacts of the environment on the Project's users and residents, rather than the Project's impact on the environment.[1229] However, to ensure a conservative analysis, the Draft EIR fully analyzes and mitigates all impacts identified in the County's adopted thresholds, even those impact thresholds that were adopted before the *CBIA v. BAAQMD* decision and are now beyond CEQA's scope.

1224 CEQA Guidelines § 15091(a)(2); *Id.,* CEQA Guidelines § 21081(a)(2)
1225 DRP 2017, p. 5.12-21
1226 *Id.,* p. 5.12-47
1227 *Id.,* pp. 5.12-47 and -48; *Id.,* Appendix 5.12-A, pp. 17, 38, 51
1228 *Id.,* pp. 6-1 to -9; 7-20 to -22
1229 *CBIA v. BAAQMD* at 369, 386

The Commenters' citations to the State CEQA Guidelines and to case law are noted. The Commenters correctly cite the State CEQA Guidelines' requirement that "[m]itigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments"[1230] and correctly quote *Fed'n of Hillside & Canyon Assns. v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261, as explaining that "[t]he purpose of these requirements is to ensure that feasible mitigation measures will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded." However, contrary to the Commenters' suggestion, all of the Draft EIR's mitigation measures, including the noise mitigation measures, meet this requirement. In *Fed'n of Hillside & Canyon Assns.*, the city identified mitigation measures but then "did not require that they be implemented as a condition of the development . . . and made no provision to ensure that they will actually be implemented . . .."[1231] Here, if the Board of Supervisors approves the Project and certifies the Draft EIR, it will incorporate the Draft EIR's mitigation measures as conditions of Project approval, and will incorporate the measures into a Mitigation, Monitoring, and Reporting Program, as provided for in CEQA.[1232] Incorporating mitigation measures into conditions of approval is legally sufficient to meet that the State CEQA Guidelines' requirement that mitigation measures be fully enforceable.[1233,1234]

The Commenters cite State CEQA Guidelines § 15126.4(a)(1)(B), which provides that "[f]ormulation of mitigation measures should not be deferred until some future time." The same Guideline goes on to state: "However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way."[1235] Applying this standard, courts have developed legal principles regarding the extent to which an agency, in concluding that a significant impact will be mitigated to a less than significant level, can rely on a mitigation measure that defers some amount of environmental problem-solving until after project approval. Such deferral is permissible where the adopted mitigation measure both (1) commits the agency to a realistic performance standard or criterion that will ensure the mitigation of the significant effect; and (2) disallows the occurrence of physical changes to the environment unless the performance standard is or will be satisfied. (See, e.g., *N. Coast Rivers All. v. Marin Mun. Water Dist.* (2013) 216 Cal.App.4th 614, 629-30 [reversing trial court finding that mitigation was impermissibly deferred, because "'when a public agency has evaluated the potentially significant impacts of a project and has identified measures that will mitigate those impacts,' and has committed to mitigating those impacts, the agency may defer precisely how mitigation will be achieved under the identified measures pending further study"] (internal quotation omitted)]; *Citizens for a Sustainable Treasure Island v City & Cty. of S. F.* (2014) 227 Cal.App.4th 1036, 1059 [mitigation performance standard is sufficient if it identifies the criteria the agency will apply in determining that the impact will be mitigated]; *Riverwatch v. City of San Diego* (1999) 76 Cal. App. 4th 1428, 1147-1448 ["the fact the entire extent and precise detail of the mitigation that may be required is not known does not undermine the

1230 CEQA Guidelines § 15126.4(a)(2)
1231 *Fed'n of Hillside & Canyon Assns. v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261
1232 CEQA Guidelines § 21081.6
1233 *Id.,* § 21081.6(b)
1234 *Gray v. Cty. of Madera* (2008) 167 Cal.App.4th 1099, 1116
1235 State CEQA Guidelines § 15126.4(a)(1)(B)

Final EIR's conclusion that the impact can in fact be successfully mitigated;" such analysis was appropriately deferred where there was "nothing in the record which suggests that the impact cannot be mitigated in the manner described in the Final EIR."]; *Rio Vista Farm Bureau Ctr. v. Cty. of Solano* (1992) 5 Cal. App. 4th. 371, 375-77 [in EIR for hazardous waste plan, specific mitigation measures could validly be proposed when individual projects were proposed in the future]; cf. *Communities for a Better Env't v City of Richmond* ("*CBE*") (2010) 184 Cal.App.4th 70, 95 [rejecting mitigation measure because, unlike the measures affirmed in numerous other cases, the measure in question "created no objective criteria for measuring success"]).

The Draft EIR's noise mitigation measures comply with these legal requirements. The mitigation measures defer the formulation of some specific measures that will be implemented at each site, but the mitigation measures "specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way," as CEQA expressly permits.[1236] The measures commit the County to specific and "objective criteria for measuring success",[1237] namely achievement of the numeric noise and vibration criteria established in the County Code. MMs 12-1 and 12-2 also identify specific alternatives to achieve the performance standard: building setbacks; noise barriers; building and interior living space orientation; sound-rated windows; upgraded exterior wall and/or roof construction; insulation batts; and forced air ventilation. The Noise Study provides expert opinion that these measures are feasible and effective in achieving the designated performance standard.[1238] Similarly, MMs 12-4 and 12-5 require specific measures sufficient to meet the specific County Code standard for vibration.

"[F]or [the] kinds of impacts for which mitigation is known to be feasible, but where practical considerations prohibit devising such measures early in the planning process ..., the agency can commit itself to eventually devising measures that will satisfy specific performance criteria articulated at the time of project approval."[1239] "Where future action to carry a project forward is contingent on devising means to satisfy such criteria, the agency should be able to rely on its commitment as evidence that significant impacts will in fact be mitigated."[1240] Here, as the Draft EIR explains, "specific noise-reduction measures that would be applied at each potentially impacted land use cannot be defined until future tract maps have been prepared and the site-specific acoustical analysis (i.e., MM 12-1) is performed."[1241] In this situation, since "practical considerations prohibit devising . . . [more specific] measures early in the planning process," deferred formulation of specific measures is not only permissible but is also the most appropriate approach.[1242]

The Commenters cite two "deferred mitigation" cases, both of which support the Draft EIR's approach. In the first case, the Commenter Center for Biological Diversity was the plaintiff,

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1236 *Ibid*.
1237 *Communities for a Better Env't v City of Richmond* ("CBE") (2010) 184 Cal.App.4th at 95
1238 DRP 2017, Appendix 5.12-A, pp. 51-54
1239 *N. Coast Rivers All.*, 216 Cal.App.4th at 629 [quoting *Sacramento Old City Assn. v. City Council* ("*SOCA*") (1991) 229 Cal.App.3d 1011, 1028-29]
1240 *Ibid*.
1241 DRP 2017, p. 5.12-22
1242 *N. Coast Rivers All.*, 216 Cal.App.4th at 629

and in that case, "[t]he Center acknowledge[d] CEQA allows . . . deferral if the EIR specifies performance standards that future mitigation must meet . . .."[1243] CBD argued, however, that DFW had failed to adopt performance standards to guide the development of future aquatic biodiversity management plans and hatchery genetic management plans.[1244] The Court of Appeal disagreed, because DFW relied upon relevant federal regulations, and "[t]hese regulations provide sufficient performance standards to satisfy CEQA."[1245] Here, the County can similarly rely on its adopted General Plan and County noise standards in formulating specific measures to mitigate impacts.

The Commenters also cite *Endangered Habitats League v. Cty. of Orange* ("*EHL*") (2005) 131 Cal. App. 4th 777, 793 (quoting *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1275), where the court noted that "an agency goes too far when it simply requires a project applicant to obtain a biological report and then comply with any recommendations that may be made in the report." But *EHL* noted that, on the other hand, "[d]eferral of the specifics of mitigation is permissible where the local entity commits itself to mitigation and lists the alternatives to be considered, analyzed and possibly incorporated in the mitigation plan," and specifically recognized that "[i]f mitigation is feasible but impractical at the time of a general plan or zoning amendment, it is sufficient to articulate specific performance criteria and make further approvals contingent on finding a way to meet them."[1246] Applying this standard, the *EHL* court affirmed numerous mitigation measures as sufficient, even though those measures bound the lead agency only to meet such standards as developing a construction traffic plan sufficient to "assure public safety," developing a fuel modification plan in compliance with county guidelines, and developing a water quality plan that incorporated "best management practices."[1247] *EHL* only invalidated a single mitigation measure, because that measure had multiple faults: (1) it permitted grading to begin after the applicant submitted an "acoustical analysis describing the 'exterior noise environment' and 'preliminary mitigation measures, if required,' with no commitment to achieve any standard of any kind, and (2) it permitted building permits to issue after submission of another acoustical analysis, for which "no criteria or alternatives to be considered are set out."[1248] Here, in contrast, no environmentally impactful activities can begin until measures are in place to achieve the specific performance standard, and MMs 12-1, 12-2, 12-4, and 12-6 outline specific, feasible, alternative measures that are available to achieve the performance standard.

For the foregoing reasons, the Draft EIR's noise analysis and mitigation complies with CEQA. However, to be responsive to the Commenters' concerns and to ensure that mitigation measures are as effective as possible, pages 5.12-48 through 5.12-49 of Section 5.12, *Noise*, of the Draft EIR, have been revised as follows:

1243 *Ctr. for Biol. Diversity v. Dep't of Fish & Wildlife* ("CBD v. DFW") (2015) 234 Cal.App.4th 214, 240

1244 *Ibid*.

1245 *Id.,* at 246 (citing *Oakland Heritage All.*, 195 Cal.App.4th at 906)

1246 *Endangered Habitats League v. Cty. of Orange* ("*EHL*") (2005) 131 Cal. App. 4th 777, 793 (quoting *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1275)

1247 *Id.,* at 794-96

1248 *Id.,* at 793-94

MM 12-1 For residences, hotels and motels, schools, and places of worship ~~adjacent to~~ within 500 feet from the centerline of a collector road with a buildout forecast of 10,000 average daily trips (ADT) or greater, a limited secondary road with a buildout forecast of 6,500 ADT or greater, or any higher classification road, the Project Applicant/Developer shall submit to the County an Acoustical Study prepared in accordance with Section 1207.12 of the County Building Code. The Acoustical Study shall demonstrate that exterior noise levels at areas where residents would reasonably be expected to spend more than one hour (e.g., backyards) would not exceed 65 A-weighted decibels (dBA) Community Noise Equivalent Level (CNEL). The Acoustical Study shall also verify, including during construction and before Certificate of Occupancy (CofO) issuance, that the buildings have been properly designed to comply with a CNEL requirement of 45 dBA for habitable interior living areas, classrooms, and rooms used for patient care and worship. The design features required to achieve the noise standard shall include one or more of the following elements, as verified by the Acoustical Study: building setbacks from the roadway; noise barriers; building orientation relative to the roadway; interior living space (bedroom, common area) orientation; sound-rated windows; upgraded exterior wall and/or roof construction; insulation batts; and forced air ventilation.

MM 12-2 For each business park use, school, community use area, park and recreation area, animal control facility, utility, County maintenance facility, commercial development, or manufacturing/industrial development, the Project Applicant/Developer shall submit an Acoustical Study verify that the Project has been properly designed to comply with the County of Los Angeles's Noise Ordinance standards at the nearby sensitive properties (both on and off site). The design features required to achieve the noise standard shall include one or more of the following elements, as verified by the Acoustical Study: building setbacks from the sensitive receptors; noise barriers; building orientation relative to the sensitive receptor; sound-rated windows; and upgraded exterior wall and/or roof construction. All stationary and point sources of noise shall adhere to the requirements of the County Code, including but not limited to Section 12.08.390, Exterior Noise Standards, Section 12.08.460, Loading and Unloading Operations, and Section 12.08.530, Residential Air-Conditioning or Refrigeration Equipment.

MM 12-3 To ensure that construction noise is minimized, in addition to meeting all requirements of Section 12.08 of the *County of Los Angeles Code,* the following measures shall be implemented during construction:

- All construction equipment, including internal combustion engines and stationary equipment (used for construction purposes) shall be equipped with noise-reducing features such as, but not limited to improved mufflers, intake silencers, ducts, engine enclosures, and acoustical shields or shrouds. All equipment items must have the manufacturers' recommended noise abatement measures, such as mufflers, engine enclosures, and engine vibration isolators, intact and operational.
- Stationary equipment (e.g., generators, air compressors, concrete pumps) located within 450 feet of residences or schools shall have noise abatement (e.g., engine enclosures or equipment placed behind barriers) to limit the noise level at the sensitive receptor to an average sound level (L_{eq}) of 60 dBA or less. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors, to the greatest extent feasible. The construction contractor shall locate pile drivers, or other machinery capable of causing strong vibrations or load noises, such that the rear of the vibratory pile driver or machinery faces toward the noise sensitive receptor when the machine is being utilized, to the greatest extent feasible.
- Equipment and material staging areas and equipment maintenance areas shall be located at least 500 feet from sensitive noise receivers, if feasible.
- Construction activities should be timed to minimize noise impact on exposed areas, by sequencing the use of equipment with relatively low noise levels versus during noise sensitive periods, routing truck traffic and controlling construction traffic activity to minimize vehicle idling, gear shifting, and accelerating under load, to the greatest extent feasible.
- Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction should be hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of

pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used. External jackets on the tools themselves can and should be used, if such jackets are commercially available and this could achieve a reduction of 5 dBA. Quieter procedures can and should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.

- Construction contracts shall specify that notices shall be sent out to all residences located within 1,000 feet of the Project site at least 15 days prior to commencements of construction. The notices shall include the construction schedule and a telephone number where complaints can be registered with the noise disturbance coordinator. A sign, legible at a distance of 50 feet, shall also be posted at the construction sites throughout construction which includes the same details as the notices.
- A "noise disturbance coordinator" shall be established at all construction sites. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved.
- The construction contractor shall establish a training program for equipment operators to instruct them in methods of operating their equipment to minimize environmental noise, and to inform them of all applicable State and County noise regulations, including the requirements contained in these mitigation measures.

To clarify the analysis used in the Draft EIR, the third paragraph of page 5.12-46 Section 5.12, Noise, of the Draft EIR, has been revised as follows:

> Increases in the ambient noise environment adjacent to SR-138 between Gorman Post Road and Old Ridge Route Road would exceed the applicable significance criterion at identified receptors. There are no mitigation measures available to reduce the significance of this impact that are within the County's jurisdiction to adopt. There are ~~f~~Feasible mitigation measures available - construction of a noise barrier at affected receptors or resurfacing the roadway with rubberized asphalt pavement - that would reduce these impacts to a less than significant level, but these measures are not within the jurisdiction of the County. Impacts would be significant and unavoidable.

Response to Comment F.8-35:

Please see response to Comment F.8-34.

The Commenters are not correct that the Draft EIR generally "states that methods for reducing traffic related noise are out of the control are out of the control of the project proponent and require alterations to private property." As described in response to Comment F.8-34, the Draft EIR imposes a comprehensive set of mitigation measures, all of which are within the County's authority to adopt and enforce, and which are sufficient to reduce all but one potentially significant impact to a level of insignificance. For a single impact – a 3.3 dBA increase along a single highway segment that currently has only one adjacent residence – the only available and feasible measures to reduce the impact to a level of insignificance are to construct a noise barrier at affected receptors or to resurface the roadway with rubberized asphalt pavement, which would require alterations to private property or to Caltrans' right-of-way.[1249] Only at this single location are the feasible measures to mitigate this impact outside of the control of the Project proponent and Lead Agency. Under this circumstance, CEQA explicitly authorizes a lead agency to find that the appropriate mitigation measures for a particular impact "are within the responsibility and jurisdiction of another public agency and not the agency making the finding."[1250]

The Commenters are not correct that the noise assessment required by MM 12-1 "may or may not be used to formulate mitigation," or that MM 12-1 fails to provide standards for effectiveness. As described in response to Comment F.8-34, MM 12-1 commits the County to the achievement of a specific, objective and defined performance standard, namely the numeric outdoor and indoor dBA standards in the County's General Plan and County Code. MM 12-1 then details the specific alternative measures which are known to be feasible in achieving the defined performance standard.[1251] This measure meets CEQA's requirements.

Response to Comment F.8-36:

The comment appears to confuse the traffic noise analysis with the analysis of noise from mobile equipment used in Project construction activities. The Draft EIR uses the term "traffic noise" to describe traffic noise generated by the operations phase of the Project. The term "mobile equipment" refers to mobile equipment used for construction activities, which create temporary noise increases that end when construction at a specific location is complete. The County Code establishes specific noise limits for mobile and stationary construction equipment, as described in Draft EIR Table 5.12-3, Los Angeles County Construction Noise Limits.[1252] With implementation of appropriate mitigation, construction noise from mobile equipment and other sources would comply with these standards and would not result in a significant noise impact.[1253] The Draft EIR separately analyzes the potential for Project-related traffic noise to result in potentially significant noise

[1249] DRP 2017, p. 5.12-45 and -46
[1250] CEQA Guidelines § 15091(a)(2); *Id.*, § 21081(a)(2)
[1251] CEQA Guidelines § 15126.4(a)(1)(B) ("measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.")
[1252] DRP 2017, p. 5.12-8
[1253] *Id.,* pp. 5.12-34, -47

increases.[1254] As described in response to Comment F.8-34, the Lead Agency has substantial discretion to develop thresholds of significance and specifically may set a threshold of significance for noise impacts that is based on an adopted county ordinance.[1255,1256,1257] In this case, the Lead Agency has properly set a threshold to measure construction noise, and a different threshold for permanent noise increases from Project operations from traffic and other sources, based on Appendix G to the State CEQA Guidelines, which specifically differentiates between permanent and temporary noise increases, and based on the County Code, which likewise differentiate between permanent noise increases and inherently temporary construction noise.

It is well established that a lead agency may establish significance criteria with reference to established regulations such as the County Code's construction noise standards, and these standards can validly take into account the fact that construction is inherently noisy, but more acceptable than operational noise impacts because of construction noise's temporary and periodic nature. Specifically, in *Sierra Club v. Tahoe Reg'l Planning Agency*, 916 F.Supp.2d 1098, 1146-1151 (E.D.Cal. 2013), the court affirmed the lead agencies' determination that noise impacts were less than significant because the project would comply with the applicable noise ordinances, even though the ordinances imposed *no upper noise limit* on construction noise, but merely limited the hours during which construction could occur. The court held that the adopted "noise ordinances embody a reasonable policy determination . . . with respect to regulating noise," and permissibly "reflect the conclusion that . . . construction noise occurring during daytime hours, even in a residential locale, is intermittent and temporary and thus not so disruptive as to give rise to a need for specific limits on it."[1258] Los Angeles County's construction noise limits are more restrictive than the ordinances affirmed in *Sierra Club*: the County Code prohibits any construction noise that creates a noise disturbance during certain times and days, and additionally establishes an upper noise limit, which varies based on the time of day of construction.[1259] CEQA authorizes the County to analyze potential construction noise impacts with reference to this established County standard.

The Lead Agency disagrees with Commenters' assertion that noise generated by mobile construction equipment cannot be distinguished from traffic noise. The noise experts who prepared the Noise Study capably differentiated noise from construction activities and traffic noise, separately quantified each, and assessed each type of noise against the specific thresholds established for each of those noise sources.[1260] Noise from the same type of noise source can also be differentiated. For example, Project-related vehicle trips that contribute toward combined background and project traffic noise can be differentiated by calculating noise levels based on different quantities of vehicle trips. Moreover, as explained in Section

1254 *Id.,* pp. 5.12-22, -37 to -46
1255 CEQA Guidelines, § 15064
1256 *Nat'l Parks & Conservation Assn v. Cty. Of Riverside*, 71 Cal.App.4th 1341, 1353 (1999)
1257 *Sierra Club v. Tahoe Reg'l Planning Agency*, 916 F.Supp.2d 1098, 1146-1151 (E.D.Cal. 2013)
1258 *Sierra Club v. Tahoe Reg'l Planning Agency*, 916 F.Supp.2d at 1150 (E.D.Cal. 2013)
1259 DRP 2017, p. 5.12-7 and -8
1260 *Id.,* Appendix 5.12-A pp. 22-25, 28-37, 40-47, 51

7.0, *Cumulative Impacts*, of the Draft EIR, the Draft EIR also analyzed the potential for cumulative noise impacts from mobile construction equipment and traffic noise. Specifically:

> In addition to construction and stationary source noise, the Project would generate mobile source noise from traffic. The noise analyses in Section 5.12 of this EIR identifies the future traffic noise exposures that would occur in the Project traffic noise study area both with and without the Project. The analysis of traffic noise is inherently a cumulative analysis because the calculation of buildout traffic noise exposures considers the anticipated future traffic volumes based on regional growth models as described in the Project traffic impact analysis, Appendix 5.11-A of this EIR (Stantec 2017). In other words, the cumulative analysis of traffic volumes includes noise generated by the Project and other projects in the traffic noise study area (as described in Section 5.12). The noise study determines that there would be less than significant traffic noise impacts to proposed on-site land uses with implementation of the mitigation program; therefore, there would not be cumulative traffic noise impacts at future on-site receptors (Wieland Acoustics 2011).
>
> (DRP 2017, p. 7-21)

Please also see responses to Comments F.8-38 and F.8-42.

Response to Comment F.8-37:

The Draft EIR states that a noise increase of 3 dBA is "barely perceptible to most people."[1261] The Commenters are incorrect that this statement is unsupported by substantial evidence. According to the Federal Highway Administration's *Highway Traffic Noise: Analysis and Abatement Guidance*, "[c]hanges that are less than 3 dB(A) may be considered negligible or unimportant under NEPA because they are barely perceptible."[1262] Table 4 of the same document also states that -3 dB(A) is a barely perceptible change in relative loudness.[1263]

Regardless, the County has conservatively characterized even a 3 dBA increase to be a "substantial permanent increase in ambient noise levels," and hence a significant impact under CEQA, in any area where the ambient noise levels under With-Project conditions fall within the "Normally Unacceptable" or "Clearly Unacceptable" categories under the California's Noise/Land Use Compatibility State CEQA Guidelines. The County previously used this same criteria to analyze substantial permanent noise increases in the EIR for the County's General Plan Update and in the EIR for Antelope Valley Area Plan.[1264,1265] No action was commenced to challenge the EIR for the General Plan Update, and therefore the EIR's

[1261] *Id.,* p. 5.12-1
[1262] Federal Highway Administration (FHA). 2011 (December). *Highway Traffic Noise: Analysis and Abatement Guidance* (p. 16). FHA: Washington, D.C.
[1263] *Id.,* p. 10.
[1264] DRP 2014a
[1265] LACDRP 2015

methods and conclusions are now conclusively valid.[1266] Commenter CBD attempted to challenge the EIR for the AVAP, but did not challenge this noise threshold or bring any claim related to noise impacts.[1267] On May 22, 2017, the Los Angeles County Superior Court rejected all of the CEQA claims CBD did bring against the AVAP EIR.[1268]

The Draft EIR states that a noise increase of 3 dBA is "barely perceptible to most people," not that it is barely perceptible to wildlife.[1269] Different wildlife species have a range of capacities to perceive noise. The Draft EIR analyzed the Project's potential noise impacts on wildlife in Section 5.7, *Biological Resources*. Potential impacts to biological resources from construction activities are addressed by MM 7-7, which limits construction noise to beyond 400 feet or outside of the breeding season for birds.[1270] Section 5.7 of the Draft EIR also analyzes potential traffic and stationary noise impacts related to the operational phase of the Project by considering potential effects on the proposed preserve system as well as open spaces and wildlife proximate to the Project site. As discussed in Section 5.7:

> In an effort to minimize operational noise impacts, the Conceptual Land Use Plan (see Exhibit 4-1) has been designed to maximize the distance between areas of high noise and preserved open space. Higher density housing and higher volume traffic roadways are near the center of developed areas, while the lower density housing and lower traffic roadways occur at the edge of the Project near open space areas. In addition, industrial and business park land uses are located adjacent to the roadway with the highest noise level (SR-138). As a result, potential wildlife impacts due to potential Project related noise are reduced to a level considered less than significant.
>
> (DRP 2017, p. 5.7-170)

Please also see responses to Comments F.8-38 and F.8-42.

Response to Comment F.8-38:

The Draft EIR states that "the land uses proposed as part of the Project are routinely constructed in Southern California and are able to meet the applicable noise standards through use of common, feasible methods and materials, including utilizing design features such as building setbacks from the sensitive receptors; noise barriers; building orientation relative to the sensitive receptor; sound-rated windows; upgraded exterior wall and/or roof construction."[1271] The Lead Agency disagrees with the Commenters' assertion that this factual finding is irrelevant to the Project. As described in response to Comment F.8-34, the fact that the above-listed methods and materials are known to be common and effective in mitigating noise impacts is among the substantial evidence in the record supporting the Lead

[1266] CEQA Guidelines, § 21167.2
[1267] Petition for Writ of Mandate, Ctr for Biol. Diversity v. Cty. of L.A., No. BS156932 (L.A. Sup. Ct. July 16, 2015); Petitioner's Opening Brief, Ctr. for Biol. Diversity v. Cty. of L.A., No. BS156932 (L.A. Sup. Ct. Oct. 24, 2016); Petitioner's Statement of Issues, Ctr. for Biol. Diversity v. Cty. of L.A., No. BS156932 (L.A. Sup. Ct. Oct. 24, 2016).
[1268] Ruling on Submitted Matter, Ctr. for Biol. Diversity v. Cty. of L.A., No. BS156932 (L.A. Sup. Ct. May 22, 2017)
[1269] DRP 2017, p. 5.12-1
[1270] *Id.,* p. 5.7-150
[1271] *Id.,* pp. 5.12-1 and -2

Agency's conclusion that the Draft EIR's mitigation measures will be feasible and effective.[1272] Moreover, as also described in responses to Comments F.8-34 and F.8-35, CEQA authorizes a lead agency to measure the significance of a noise impact relative to generally applicable, adopted standards, and so the County's generally applicable General Plan and County Code standards are relevant to the Draft EIR's analysis of the Project's potential impacts.

The Commenters mischaracterize the Draft EIR to imply that there is a contradiction between the Project's 20-year buildout timeline and the Draft EIR's statement that construction noise is relatively short-term and temporary. The Draft EIR states that "while the total construction period is approximately 20 years, an audible increase in the ambient noise level due to construction experienced *at any individual receptor* would be relatively short-term and temporary" (emphasis added).[1273] The Project site is 12,323 acres.[1274] As such, development of specific portions of the Project site will cease to generate construction noise once construction of that portion of the Project is complete. Any individual receptor will only perceive construction noise during the specific time that nearby portions of the Project site are under construction. Moreover, as construction activities occur further and further from an individual receptor, noise from construction activities will be attenuated by intervening structures that would be developed, in addition to the increasing distance from which construction activities would occur.

Response to Comment F.8-39:

MM 12-3 states specifically that stationary equipment must set back 450 feet from "residences or schools," or else incorporate sufficient noise abatement to limit the noise level at the sensitive receptor to 60 dBA or less.[1275] In response to this comment, to clarify the sentence cited by the Commenters, page 5.12-2 of Section 5.12, *Noise*, of the Draft EIR has been revised as follows:

> MM 12-3 would be incorporated into the Project and require stationary equipment to operate at a distance of greater than 450 feet from residences or schools or to provide an enclosure or similar noise attenuation to limit the average hourly daytime noise level to 60 dBA or less.

MM 12-3 requires, among other measures, that equipment staging and maintenance areas be located 500 feet or greater distance from sensitive receptors, if feasible. The Lead Agency disagrees with the Commenters' statement that this measure creates "no binding requirement on the project proponent." This requirement is binding as long as it is technically feasible to provide a buffer distance of at least 500 feet. The Project site is 12,323 acres. For the majority of the construction phases, there will be sufficient area available to site staging and maintenance areas 500 feet from noise sensitive uses. In those areas, this measure will provide noise protections for sensitive receptors that would not exist without

[1272] *Id.,* Appendix 5.12-A pp. 51-54 (noise expert conclusion that these methods are feasible and effective in reducing significant noise impacts to a less than significant level)
[1273] DRP 2017, p. 5.12-2
[1274] *Id.,* p. 4-2
[1275] *Id.,* p. 5.12-49

MM 12-3. However, as the Project site is constructed, areas that satisfy this requirement will diminish, such that meeting this mitigation measure may no longer be feasible at certain locations. But even in locations where a 500-foot setback is infeasible, MM 12-3 still requires construction activities to comply with the construction noise limits and other requirements in the County Code. As discussed in responses to Comments F.8-34, F.8-36, and F.8-38, the Draft EIR properly concludes that construction noise impacts would be less than significant, because the Project would comply with these adopted noise standards.[1276,1277]

There is no inconsistency between Drat EIR Table 5.12-2 and MM 12-3. The former describes the County's standards for permanent operational noise, while the latter deals specifically with construction noise. Draft EIR Table 5.12-2 describes the County Code's standards for noise from non-construction stationary sources. MM 12-3 specifically addresses noise generated during construction, and requires construction activities and equipment to comply with the County Code's construction noise requirements. As described in response to Comments F.8-34, F.8-36, and F.8-38, the County Code's construction noise regulations set different noise levels for different equipment, different noise receptors, and different days and times.[1278] The Draft EIR concludes that MM 12-3 would reduce construction noise impacts to a less than significant level, since MM 12-3 requires compliance with the County Code's construction noise standards. One section of MM 12-3 also requires an additional measure, requiring any stationary construction equipment within 450 feet from schools or residences to impose noise abatement sufficient to ensure a 60 dBA or less noise exposure at the sensitive receptor. This measure provides an additional level of assurance that construction noise impacts will be less than significant, but it does not undermine the Draft EIR's valid conclusion that requiring compliance with the County Code's adopted noise standards is sufficient to mitigate significant impacts.[1279] As described in responses to Comments F.8-34, F.8-36, and F.8-38, it is well established that a lead agency may establish significance criteria with reference to regulations such as the County Code's construction noise standards, and that these standards can validly take into account the fact that construction is inherently noisy, but more acceptable than operational noise because of its temporary and periodic nature.[1280]

Similarly, Draft EIR Tables 5.12-2 and 5.12-3 are reconcilable because the County Code sets one set of standards for stationary sources used in construction, and a different set of standards for stationary source noise from non-construction activities. (See, e.g., County Code §§ 12.08.090 ["'Construction' means any site preparation, assembly, erection, substantial repair, alteration, or similar action, for or of public or private rights-of-way, structures, utilities, or similar property"], 12.08.440(B) [setting standards specific to "construction activities"]; 12.08.440(D) ["In case of a conflict between this chapter and any other ordinance regulating construction activities, provisions of any specific ordinance regulating construction activities shall control"].)

1276 *Sierra Club v. Tahoe Reg'l Planning Agency*, 916 F.Supp.2d 1098, 1146-1151 (E.D.Cal. 2013)

1277 *Oakland Heritage All. v. City of Oakland* (2011) 195 Cal.App.4th 884, 896

1278 DRP 2017, p. 5.12-8, Table 5.12-3

1279 *Oakland Heritage All.*, 195 Cal.App.4th at 896 (compliance with regulations can mitigate impacts to less than significant)

1280 See, e.g., *Sierra Club*, 916 F.Supp.2d at 1146-51

Response to Comment F.8-40:

The Commenters' citations to the State CEQA Guidelines, and to case law, are noted. In *Communities for a Better Env't v. City of Richmond* (2010) 184 Cal. App. 4th 70, 95, the court rejected an EIR's mitigation measures because they failed to meet the necessary requirements for a valid deferred mitigation regime: to "[undertake] a complete analysis of the significance of the environmental impact," to develop "proposed potential mitigation measures early in the planning process," and to "articulate[] specific performance criteria that would ensure that adequate mitigation measures were eventually implemented." Here, as described in response to Comment F.8-34, the Draft EIR's mitigation measures meet all of these requirements and conform to the measures affirmed in numerous deferred mitigation cases.

The Commenters also cite a portion of *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 428, in which the court quotes CEQA Guidelines § 15144 as stating that while "foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can." *Vineyard* involved entirely distinguishable facts – the agency failed to disclose and mitigate foreseeably potential impacts on long-term water supplies – that the Commenters do not relate to the Project's analysis of cumulative noise impacts.[1281] As described in response to Comment F.8-42, the Draft EIR's cumulative noise impacts analysis complies with CEQA's requirement to "find out and disclose all that . . . [the County] reasonably can" regarding the Project's reasonably foreseeable cumulative noise impacts, without resorting to speculation.[1282] For a response to the Commenters' comments on the Draft EIR's analysis of water supply impacts, please see responses to Comments F.8-212 through F.8-226.

Response to Comment F.8-41:

The Commenters' citations to case law are noted. In *Envtl. Prot. Info. Ctr., Inc. v. Johnson* (1985), 170 Cal. App. 3d 604, 624, the lead agency did not conduct *any* cumulative impacts analysis, an obvious legal error that the County did not commit here.[1283] In *Kings Cty. Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692, 720, the court rejected a lead agency's contention that "whenever an agency determines impacts specific to a particular project are not significant, corresponding cumulative impacts cannot be considered significant . . ." Here, the Draft EIR's analysis specifically considers not just whether impacts specific to the Project are significant, but also whether the that "the incremental effects of . . . [the] [P]roject are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."[1284,1285]

Please see response to Comment F.8-42.

[1281] *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th at 444-45
[1282] CEQA Guidelines, § 15145
[1283] DRP 2017, pp. 7-1 to -36
[1284] CEQA Guidelines, § 15065(a)(3)
[1285] DRP 2017, pp. 7-1 to -9

Response to Comment F.8-42:

As described in response to Comment F.8-34, the Draft EIR's noise mitigation measures are legally valid under CEQA, and substantial evidence supports the Draft EIR's conclusion that the measures would reduce project-level impacts to a less than significant level. Therefore, the Draft EIR's cumulative impacts analysis properly takes these mitigation measures into account when considering whether the Project's incremental contribution to cumulative impacts would be considerable.[1286]

The Draft EIR's cumulative impacts analysis considers the potential for the Project to contribute to cumulative noise impacts, in light of reasonably foreseeable development in the Project vicinity, including (1) regional growth projections in the *Los Angeles County General Plan*, the *Antelope Valley Area Pan*, the *Kern County General Plan*, the Southern California Association of Governments' 2012 and 2016 RTP/SCS, and the Kern Council of Governments' 2014 RTP/SCS; (2) summaries of anticipated development, as reported by the County of Los Angeles Department of Regional Planning; the Kern County Planning and Community Development Department; the City of Lancaster Planning Department; the City of Palmdale Planning Division; and the City of Santa Clarita Planning Division; and (3) specific anticipated projects in the Project vicinity at the Burrows property, Gorman Post Ranch, Tejon Mountain Village, the Tejon Ranch Commerce Center, Grapevine, and the Northwest 138 Corridor Improvement Project ("NW SR-138 Project").[1287] This thorough investigation of reasonably foreseeable development in the Project vicinity complies with CEQA's requirements that a lead agency "use its best efforts to find out and disclose all that it reasonably can,"[1288]while recognizing that "foreseeing the unforeseeable is not possible"[1289] and that an EIR should not resort to speculation[1290].

With respect to the NW SR-138 Project, the Draft EIR concludes that there is a low possibility that Project construction would overlap with SR-138 activities because of the "mobile nature of construction activities (moving from area to area on a site or alignment)."[1291] The Draft EIR acknowledges that both projects may occur concurrently, but is unlikely that construction activities for both projects would occur adjacent to same noise-sensitive receptors at the same time. The Project site is 12,323 acres. The linear extent of the NW SR-138 project is 36.8 miles.[1292] Because of the size of both these projects, it is unlikely that construction activities for both of these projects would occur simultaneously near the same sensitive receptor for a sustained period of time. Due to the large size of the Project site, the Project will be constructed in phases, with specific portions of the site developed at different times.[1293] This is also expected with the NW SR-138 Project.[1294] It is unlikely that the entirety of the 36.8-mile stretch of SR-138 will be reconstructed simultaneously, due to impacts on

1286 *Id.,* p. 7-21
1287 *Id.,* p. 7-3 to -9; *Id.,* Appendix 7.0-A, *Development Summaries*
1288 CEQA Guidelines, § 15144
1289 *Ibid*.
1290 CEQA Guidelines, §15145
1291 DRP 2017, p. 7-21
1292 Caltrans 2017b, p. 1
1293 DRP 2017, pp. 4-91 to -96
1294 Caltrans 2017b, p. 24

traffic congestion and the large requirements in manpower and equipment. It is likely that construction would occur in phases, and once one phase is complete, construction noise at that particular location will end or dissipate as construction moves to a different location along the Project route. Moreover, Caltrans projects are subject to Caltrans' Standard Specifications and Standard Special Provisions for Noise Control, and Caltrans' NW SR-138 Final EIS/EIR requires additional mitigation measures on the NW SR-138 Project, such as requiring construction equipment to use improved noise muffling, engine enclosures, and engine vibration isolators.[1295] The Draft EIR's analysis of traffic noise is an inherently cumulative analysis because the calculation of buildout traffic noise exposures considers the anticipated future traffic volumes based on regional growth models.[1296] The Draft EIR's analysis demonstrates that the Project's incremental contribution to traffic noise would not be cumulatively considerable.

Response to Comment F.8-43:

As discussed on Draft EIR page 5.9-29, the Project is anticipated to create approximately 23,675 jobs at the on-site commercial uses, business parks, commercial recreation uses, and public facilities. It is understood that a person's place of residence and employment are choices affected by a number of personal and economic factors, and that community members who live outside the Project may apply for and obtain some of the permanent positions the Project creates. However, providing opportunities to work and shop near residences allows people to reduce vehicle use, reduces travel times, and encourages walking and biking to work. While the Draft EIR notes that many on-site jobs could be filled by Project residents, it does not guarantee this or rely on this assumption for its impact conclusions. Rather, at the page the Commenter cites for this assertion,[1297] the Draft EIR discusses the Project's role in assisting to meet the State-mandated Regional Housing Needs Assessment housing production goals for the unincorporated areas of the County. As noted in Draft EIR pages 5.9-2 and 5.9-3, the Project is consistent with this regional effort because it implements a key AVAP strategy to designate areas for light and heavy industrial uses near major transportation corridors and/or a concentration of skilled labor force in EOAs, and provides an estimated jobs/housing ratio of 1.22, through the development of commercial and business park uses on the site for use by high-tech manufacturing, transportation, and logistics companies. The Project also meets the AVAP strategy of providing a complete, mixed use community within the West EOA. This is an appropriate discussion of the Project's role in helping to meet AVAP goals and regional housing needs, not a guarantee that Project residents will fill all on-site jobs, or a reliance on such an assumption. While the jobs that would be available at the Project site may not match the skills of the residents who ultimately decide to live at the Project site, the range of development densities and housing types that are allowed by the Specific Plan would make available a range of housing at various costs. At the same time, the variety of non-residential land uses that are allowed would also provide a wide variety of jobs and a range of salaries. As such, there is likely going to be a subset of housing types and costs that would be affordable to the on-site employees.

1295 *Id.,* pp. 304, 435-37
1296 DRP 2017, p. 7-21
1297 *Id.,* p. 5.9-3

Further, the reduction of vehicle trips and emissions will be continually monitored to ensure achievement of a specific performance standard. The Mobility Plan requires the formation and funding of a Transportation Management Agency (TMA) prior to the issuance of the first occupancy permit. The TMA is responsible for monitoring the form of travel, or transit modes, used by the people who live and work in Centennial. Draft EIR pages 4-30 through 4-31 discuss the TMA and the Mobility Performance Standards of the Project and Draft EIR pages 4-36 through 4-39 discuss the Transportation Demand Management (TDM) measures to be implemented by the Project. As stated on page 4-36 of the Draft EIR and page 3-25 of the Centennial Specific Plan, the TMA would manage compliance with the internal and external mobility performance standards of the Specific Plan by conducting transit mode surveys and other appropriate monitoring activities to verify the effectiveness of TDM measures. The monitoring and adaptive management process will be a continuing obligation of the TMA. See further discussion in response to Comment F.8-204.

With regard to Kern County, the Draft EIR acknowledged that it has historically experienced higher unemployment rates than the State as a whole.[1298] However, as indicated in Draft EIR Table 5.9-22, Caltrans projections indicate that employment in Kern County will increase 55.6 percent over the next three decades.[1299]

Response to Comment F.8-44:

In Section 4.9, Population, Housing, and Employment, the Draft EIR properly and conservatively evaluates Project impacts against the existing baseline to determine the significance of population and housing growth. Under Threshold 9-1, the Draft EIR asks "Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?"[1300] The Draft EIR properly concludes that while the Project's impact would be less than significant in relation to planned population, housing, and employment growth in the region under threshold 9-4, because the Project would substantially increase population and housing relative to the existing Project site conditions, it would have a significant and unavoidable impact under Threshold 9-1.[1301] While the Draft EIR discusses Thresholds 9-1 and 9-4 together because they are related, the Draft EIR does not "override" the finding of significance under Threshold 9-1 by reference to Threshold 9-4. Rather, in light of Project Objectives discussed in Draft EIR Section 4.0, Project Description, which include to meet regional planning goals and help accommodate anticipated regional growth in an appropriate location, there is no feasible mitigation for the significant impact under Threshold 9-1.

CEQA Guidelines specify that an EIR shall include "feasible" mitigation measures which could minimize significant adverse project impacts.[1302] The feasibility of mitigation measures must be considered in light of Project objectives, which "should include the underlying purpose of

[1298] *Id.,* p. 5.9-22
[1299] *Ibid.*
[1300] *Id.,* p. 5.9-23
[1301] *Id.,* pp. 5.9-23 to -32
[1302] CCR §15126.4(a)(1)

the project."[1303] The underlying purpose of the Project stems from the need for a sustainable community in the greater Los Angeles County region that creates a balance among residential, commercial, and other employment-generating uses and institutional/public uses, while being sensitive to the environment.[1304] This is consistent with the growth projections, visions, assumptions, goals, and policies of the AVAP and 2012-2035 and 2016-2040 SCAG RTP/SCS. The AVAP sets forth a vision that includes the creation of opportunities for the Antelope Valley area to change and grow, while preserving the rural lifestyle enjoyed by current residents and supporting a vibrant economy.[1305] The AVAP was prepared to achieve this vision using four types of environments that would facilitate the preservation of rural areas of the Antelope Valley and focus development in appropriate areas, including Rural Preserve Areas, Rural Town Areas, Rural Town Centers, and Economic Opportunity Areas (EOAs). An EOA is defined as a cluster of land with higher development densities along the routes of two proposed major infrastructure projects in the Antelope Valley – the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[1306] The Project site is located entirely within the West EOA.[1307] Pursuant to the above, Project objectives expressed in Draft EIR Section 4.0, *Project Description* are as follows:

- Implement the Antelope Valley Area Plan (AVAP) by creating an environmentally and economically sustainable master-planned community on the Project site to help accommodate planned regional population and economic growth within the West EOA.
- Design the Project to maximize efficient utilization of regional infrastructure while preserving hundreds of thousands of acres of contiguous natural open space and important biological resources.
- Size the Project to include a broad range of employment, residential, institutional, and recreational land uses to encourage walkability and wellness, while reducing off-site employment-related commuter trips.
- Ensure that all Project site infrastructure and public services are funded by the Project to avoid creating any financial obligations on existing residents and other taxpayers.
- Integrate a multi-modal transportation network, renewable energy, water conservation, community wellness, and other green development features into the Project's design, build out, and ongoing operations.[1308]

During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural

[1303] CCR §15124(b)
[1304] DRP 2017, p. 4-3
[1305] *Ibid.*
[1306] DRP 2015, p. I-8
[1307] *Id.,* pp. 4-3 and -4
[1308] DRP 2017, p. 4-4

uses".[1309] Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure".[1310] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[1311]

The Project has been designed to achieve the above-described AVAP goals, as the Draft EIR explains in its Project Objectives. While the Project would substantially increase population and housing relative to the existing Project site conditions, which is a significant impact under Draft EIR Threshold 9-1, this impact is appropriately considered significant and unavoidable because any potential mitigation such as a significant reduction in the Project's proposed unit count and commercial square footage would result in a development proposal that is not consistent with the goals and policies of the AVAP related to the development within the West EOA, and therefore would not support Project Objectives. Please also see F.8-66 with regard to the Lead Agency's appropriate formulation of Project Objectives.

As noted above, the Draft EIR also evaluates the Project's impacts under Threshold 9-4, which asks "Would the project cumulatively exceed official regional or local population projections?," and under this threshold appropriately concludes that the Project would have a less than significant impact.[1312] This is because implementation of the Project would accommodate the growth anticipated in the AVAP and by SCAG projections in the 2012-2035 RTP/SCS and 2016-2040 RTP/SCS, and would create employment opportunities on the site at a ratio of 1.22 at buildout, helping the County to attain its targeted jobs/housing ratio of 1.3 jobs per dwelling unit.[1313] The Project would contribute to meeting the RHNA housing production goals for the County and would be consistent with the regional effort to boost housing production in unincorporated areas of Los Angeles County to meet regional housing needs, and would achieve the economic development objectives for the Antelope Valley through development of a balanced urban development located adjacent to critical transportation and water infrastructure.[1314] Under Threshold 9-4, Project impacts would be less than significant because it implements and is consistent with the AVAP and SCAG RTP/SCS, and no mitigation is required.

Response to Comment F.8-45:

This comment inaccurately summarizes the growth projections for Los Angeles County, cities and towns located in the northern portion of the County, and the North Los Angeles County region. Contrary to the suggestion in the comment, the Southern California Association of Governments (SCAG), the state Department of Finance (DOF) and Los Angeles County do project that Los Angeles County will experience substantial growth between 2012

1309 DRP 2015, p. I-8
1310 *Id.,* p. I-8
1311 *Ibid.*
1312 *Id.,* p. 5.9-31
1313 *Ibid.*
1314 *Id.,* pp. 5.9-28 and -31

and 2040. As discussed on Draft EIR page 5.9-7 and in Draft EIR Table 5.9-1, the 2012 and 2016 SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) projects that the SCAG regional population will increase by approximately 1,073,000 residents between 2012 and 2020 and by 2.743 million between 2020 and 2040. The 2040 net increase of 2.743 million residents is larger than the 2016 population of 15 states reported by the U.S. Census Bureau and the District of Columbia, or the equivalent of adding the entire population of New Hampshire (1.334 million population) and Hawaii (1.428 million population) to the SCAG region. As discussed on Draft EIR page 5.9-8 and Draft EIR Table 5.9-2, in 2012 SCAG projected that, in 2035, Los Angeles County's population would increase by approximately 1.11 million by 2035 people from the DOF 2016 population estimate for the County (10,241,335 residents). In 2016, SCAG projected that, in 2040, the County's population would increase by 1.27 million people from the 2016 DOF County population estimate. The net increase in the County's 2035 and 2040 population estimated by SCAG would be larger than the 2016 populations of nine states and the District of Columbia. Growth of this magnitude is correctly and accurately characterized as "substantial" in the Draft EIR.

The Draft EIR also accurately states that a disproportionate share of the County's projected growth will occur in the North Los Angeles County region that includes the Project site. As discussed on Draft EIR pages 5.9-9 to 5.9-10, in 2016 SCAG projected that from 2016 to 2040 the resident population in Santa Clarita would increase by 19.4 percent, by 33.6 percent in Lancaster, and by 25.9 percent in Palmdale (25.9 percent). SCAG also projected that the population of North Los Angeles County would increase by 49.86 percent from 2012 to 2040, and that the resident population in unincorporated North Los Angeles County would more than double from 143,325 in 2012 to 312,240 in 2040. The County and SCAG further projected that the Antelope Valley resident population would increase from 406,126 to 784,310 by 2035 in conjunction with the Antelope Valley Area Plan (AVAP) update and EIR, which was certified in June 2015. Notably, no party, including the Commenter, challenged the AVAP EIR's population and growth analysis within the applicable statute of limitations, and therefore this analysis is now "conclusively presumed to comply" with CEQA.[1315] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the AVAP EIR's population and growth analysis (Petition for Writ of Mandate, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. BS156932 [L.A. Cty. Sup. Ct. July 16, 2015]; Petitioner's Opening Brief, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 [L.A. Cty. Sup. Ct. Oct. 24, 2016]; Petitioner's Statement of Issues, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 [L.A. Cty. Sup. Ct. Oct. 24, 2016]; Petitioner's Reply Brief, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 [L.A. Cty. Sup. Ct. Jan. 18, 2017]). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[1316] The comment provides

[1315] CEQA Guidelines § 21167.2

[1316] Ruling on Submitted Matter, Ctr. For Biol. Diversity v. Cty. of Los Angeles, No. BS156932 ([L.A. Cty. Sup. Ct. May 22, 2017), at p. 13

no evidence suggesting that that the population and growth estimates used in the AVAP EIR and in the Draft EIR are inaccurate in any manner.

Contrary to the comment, nothing in the SCAG 2016 RTP/SCS suggests that substantial growth will not occur in Los Angeles County or that regional-scale growth trends will affect the Project's capacity to develop residential, commercial and employment land uses in a balanced manner over time. On page 49, the 2016 RTP/SCS states, consistent with the Draft EIR, that by 2040 the SCAG region's population is expected to grow by more than 20 percent to 22 million people, an increase of 3.8 million people. Consistent with the Draft EIR, 2016 RTP/SCS Table 3-1 shows that Los Angeles County will grow from 9,923,000 residents to 11,514,000 residents between 2012 and 2040, a population increase of about 16 percent and 1,591,000. Since the Draft EIR accurately summarizes growth projections for the SCAG region, the County, and the North County, the comment does not identify any factual information that would affect the Draft EIR analysis and conclusions.

As in many parts of the country, the 2016 RTP/SCS[1317] notes that the SCAG regional population is aging and the percentage share of younger people of working age is expected to fall. The plan further notes that, due to these demographic trends, the SCAG region could face a labor shortage and a subsequent reduction in tax revenues. The comment does not provide a compelling explanation for why the regional demographic trends discussed in the 2016 RTP/SCS could affect the number of Project residents commuting to other locations. The final sentence suggests that these trends mean "that few residents are of peak employment age living in the city, meaning the regional ability to fill employment (likely retail) of the Project are limited [*sic*]." This statement does not provide any support for the speculation that Project employment land uses, which include commercial and industrial uses, will be "mainly retail." In addition, the 2016 RTP/SCS indicates that younger residents may prefer to live in denser, mixed-use urban areas, or the precise opposite of the comment's apparent assertion that "few residents are of peak employment age living in the city *[sic]*." The comment does not explain why the potential labor shortage discussed in the 2016 RTP/SCS could affect the Project's ability to generate employment uses. A labor shortage would increase wages throughout the region, including within the Antelope Valley portion of Los Angeles County where the Project is located. Wage increases would increase the ability of prospective buyers, including buyers employed within the site, to purchase new homes in the Project. Project area employers would also be required to increase wages to attract workers if a regional labor shortage materializes which would increase the ability of onsite workers to purchase homes in the Project area.

As discussed in more detail in response to Comment F.8-23, the estimates of Project internal trips and tripends utilized in the Draft EIR is derived directly from the updated North County Sub-Area Model used by the County in the AVAP EIR. The proportion of trips and tripends that are projected to be internal and external to the Project site by the North County Sub-Area Model are based on model parameters such as population, employment and the relative distances between areas for which Project trips will be made. As shown in Table 5.10-19 of the Draft EIR, the model projects that about 48 percent of the Project's total average daily

[1317] SCAG 2016a, p. 50

trips (ADT) at buildout will be internal, and 52 percent will be external to the Project site. Notably, no party, including the Commenter, challenged the AVAP EIR's traffic analysis within the applicable statute of limitations, and therefore the AVAP EIR's traffic analysis is now "conclusively presumed to comply" with CEQA.[1318] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the EIR's traffic analysis (Petition for Writ of Mandate, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. BS156932 (L.A. Cty. Sup. Ct. July 16, 2015); Petitioner's Opening Brief, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Statement of Issues, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Reply Brief, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 (L.A. Cty. Sup. Ct. Jan. 18, 2017). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[1319] The Lead Agency is entitled to rely on expert traffic model estimates as substantial evidence of a project's likely traffic impacts, including the air emissions associated with such traffic trips.[1320] The comment does not question the accuracy of the North County Sub-Area Traffic Model, or provide evidence that the model is unreliable.

In summary, the Draft EIR accurately and consistently summarizes published SCAG, DOF and County growth projections, including the 2016 RTP/SCS. The analysis of Project internal and external trips is derived from the most recent version of the North County Sub-Area Traffic Model developed by the County for the AVAP EIR that was certified in 2015. No party, including the Commenter, challenged the AVAP EIR analysis of growth and population or the reliability of the North County Sub-Area Traffic Model. The Project implements the AVAP for the Project area, and the Project traffic analysis is consistent with, and is based on the same traffic model used in the certified AVAP EIR. The demographic trends discussed in the 2016 RTP/SCS do not support and are the opposite of the apparent assertions made in portions of the comment. Finally, the comment does not explain why the potential labor shortage discussed in the 2016 RTP/SCS could affect the Project's ability to generate employment uses. The comment does not explain why the potential labor shortage discussed in the 2016 RTP/SCS could affect the Project's ability to generate employment uses when such a shortage would increase wages, including for employment within the site, and thus increase the ability of onsite workers to purchase homes within the Project.

Response to Comment F.8-46:

The Commenter's opinion that the Draft EIR's discussion of cumulative population, housing, and employment impacts is insufficient is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors. However, the Lead Agency disagrees, and notes that the Draft EIR adequately addressed cumulative population,

[1318] CEQA § 21167.2

[1319] Ruling on Submitted Matter, Ctr. For Biol. Diversity v. Cty. of Los Angeles, No. BS156932 (L.A. Cty. Sup. Ct. May 22, 2017), at p. 13

[1320] *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal* (1988) 47 Cal.3d 376, 410; *National Parks & Conserv. Ass'n v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1362

housing, and employment impacts. Rather, it discloses that while the Project would result in substantial growth, it would be consistent with local and regional growth assumptions.[1321] As such, with regard to its consistency with County and regional plans, cumulative population, housing, and employment impacts would be less than significant.[1322] This is consistent with Draft EIR analysis and conclusion under Threshold 9-4 in Section 4.9, *Population, Housing, and Employment*, at Draft EIR pages 5.9-23 through 5.9-31. However, with regard to Project-related growth on site relative to existing Project site conditions, the cumulative impact discussion concludes that impacts would be significant and unavoidable.[1323] This is consistent with Draft EIR analysis and conclusion under Threshold 9-1 in Draft EIR Section 4.9, at pages 5.9-23 through 5.9-31. While the Draft EIR discusses Project impacts and appropriate mitigation strategies for Thresholds 9-1 and 9-4 together because they are related, the Draft EIR clearly concludes that impacts are less than significant with regard to consistency with regional plans, but significant and unavoidable with regard to overall growth on the site in comparison to existing conditions. The Draft EIR also explains that there is no appropriate and feasible mitigation to reduce the significant impact under Threshold 9-1.[1324] In light of Project Objectives discussed in Draft EIR Section 4.0, *Project Description*, which include meeting regional planning goals and helping accommodate anticipated regional growth in an appropriate location, there is no feasible mitigation for the significant impact under Threshold 9-1. Any potential mitigation such as a significant reduction in the Project's proposed unit count and commercial square footage would result in a development proposal that is not consistent with the goals and policies of the AVAP related to the development within the West EOA or with SCAG's regional growth projections, and therefore would not support Project Objectives. Please see responses to Comments F.8-44 for further discussion.

Similarly, with regard to growth-inducing impacts, the Draft EIR comes to differing conclusions when analyzing the Project in relation to regional planning and anticipated regional growth projections versus in relation to existing Project site conditions. In relation to regional planning, the Draft EIR concludes that because the Project is consistent with growth projections, allowable land uses, and development densities/intensities in the AVAP and because the EIR for the AVAP adequately analyzed the growth-inducing impacts of the AVAP, the Project would not have any growth-inducing impacts that were not previously analyzed in that certified EIR, and would not be considered growth-inducing in relation to planned-for and foreseeably anticipated regional growth.[1325] However, the Commenter is correct that with regard to the proposed Project's impacts in comparison to existing Project site conditions, the Draft EIR conservatively concludes that the existence of the Project makes it reasonably foreseeable that additional development proposals seeking AVAP amendments could be made outside the West EOA, which is considered a significant, adverse indirect growth-inducing impact.[1326] Please see responses to Comments F.8-47, F.8-48, and

[1321] DRP 2017, pp. 7-18 and -19
[1322] *Id.,* p. 7-19
[1323] *Ibid.*
[1324] *Id.,* pp. 7-19, 5.9-31
[1325] *Id.,* p. 6-2
[1326] *Id.,* pp. 7-19, 6-6 to -9

F.8-49 regarding the Draft EIR's appropriate discussion of potential growth-inducing impacts.

Response to Comment F.8-47:

The Commenter's summary of CEQA requirements for analysis of growth-inducing impacts is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors, but the Lead Agency notes that it is incomplete and overstates the depth of analysis required for the Draft EIR. As noted by the Commenter, CEQA indicates that an EIR shall include "a detailed statement setting forth…the growth-inducing impacts of the proposed project."[1327] The CEQA Guidelines elaborate, and explain that an EIR should "discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth…"[1328] Further, an EIR's discussion of growth-inducing effects should not assume that growth is necessarily either beneficial or detrimental.[1329] Interpreting the above-described standards, courts have held that an EIR is not required to provide a detailed analysis of a project's effect on growth. Rather, a general analysis based on foreseeable impacts is sufficient. As the court explained in *Napa Citizens for Honest Government v. Napa County Bd. Of Supervisors* (2001) 91 Cal.App.4th 342 ("*Napa Citizens*"), "Nothing in the Guidelines, or in the cases, requires more than a general analysis of projected growth. The detail required in any particular case necessarily depends on a multitude of factors, including, but not limited to, the nature of the project, the directness or indirectness of the contemplated impact and the ability to forecast the actual effects the project will have on the physical environment."[1330] An EIR need not evaluate speculative growth-inducing impacts of a project.[1331]

Consistent with CEQA requirements as described above, the Draft EIR analysis of growth-inducing impacts uses the AVAP EIR as a forecasting tool to independently evaluate reasonably foreseeable regional growth patterns and population trends. The potential implementation of the Project was known at the time of the development of the AVAP and was accounted for in the AVAP's land use and population/employment growth assumptions. The Draft EIR determined that the Project is consistent with allowable land use and development densities and intensities in the AVAP. Draft EIR discussion of prior analysis in the AVAP EIR is reasonably understood as an incorporation of the evidentiary value of that analysis into the Draft EIR, which independently determined that the Project would not result in significant growth-inducing impacts related to approved County and regional plans after reaching the same conclusions as the AVAP EIR regarding foreseeable growth patterns and population trends.

The Draft EIR therefore appropriately focuses the remaining analysis in Section 6.0, Growth-Inducing Impacts, on potential, reasonably foreseeable growth-inducing impacts that are

[1327] PRC §21100
[1328] CCR §15126.2(d)(2)
[1329] *Id.,* §15126.2(d)
[1330] *Napa Citizens* at 369
[1331] *Federation of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 CA4th 1252, 1265

peculiar and specific to the Project and its exact location. To focus the analysis, the Draft EIR first discusses growth constraints near the Project site that limit the ability of the Project to influence growth, including a 2008 Conservation and Land Use Agreement between Tejon Ranch Company and Resource Groups that precludes development in approximately 240,000 acres of open space set aside in the agreement, the San Gabriel Mountains and Angeles National Forest south of the Project site, the Los Padres National Forest and Hungry Valley State Vehicular Recreation Area to the west of the Project site, legally limited water supply in the Antelope Valley, and related provisions in the County General Plan which require focusing new development in designated locations including the West EOA in which the Project site is located.[1332] As a result of the above constraints, the Draft EIR identifies the limited locations near the Project site where the only foreseeable induced growth could occur – these include areas west of the Project site from Quail Lake along SR-138 to the I-5 and northward along the eastern side to Gorman, areas east of the Project site along the SR-138 corridor and inside the West EOA, and areas east of the Project site that are outside of the West EOA near Neenach and toward the cities of Lancaster and Palmdale.[1333]

Taking the above context into account, the Draft EIR evaluates the Project's potential to cause significant growth-inducing impacts under four criteria, including whether the Project would remove obstacles to growth, whether the Project would result in the need to expand one or more public services to maintain desired levels of services, whether the Project would encourage or facilitate economic effects that could result in other activities significantly impacting the environment, or if approval would involve precedent-setting actions that could encourage and facilitate other activities that could significantly affect the environment.[1334] Under the first and second criteria, the Draft EIR notes that project infrastructure and services would be sized to accommodate the Project population only, and as such would not directly lead to growth in surrounding areas.[1335] No new electrical production plants or natural gas facilities are part of the proposed Project, and renewable energy generated onsite would be used only by the Project.[1336] The Project would not generate extra potable water that could be used to support additional development, and the Project's wastewater reclamation facilities would only treat Project-related water.[1337] Internal Project roads would not be sized to support regional traffic flows and would not provide access to other areas outside of Project boundaries.[1338] The Project will add fire and police stations, libraries, and schools to support the anticipated population associated with the Project, but these service facilities will be scaled to serve the Project only.[1339] However, the Draft EIR recognizes the possibility that future nearby landowners could propose to connect to or build upon the Project's infrastructure to serve future development, and could recognize the benefits of Project services and propose further services and development.[1340] The Draft EIR appropriately discloses these possibilities, and further discussion would be

[1332] DRP 2017, pp. 6-4 and -5
[1333] *Id.,* pp. 6-5 and -6
[1334] *Id.,* pp. 6-6 to -9
[1335] *Id.,* pp. 6-7 and -8
[1336] *Ibid.*
[1337] *Id.,* p. 6-7
[1338] *Ibid.*
[1339] *Ibid.*
[1340] *Id.,* pp. 6-6 to -8

unduly speculative because they are uncertain events, are not part of the Project, and are outside of the Project Applicant's control. Further, the potential for these impacts to occur is limited by the growth constraints near the Project site, and as noted in the Draft EIR, any such proposals would be subject to environmental analysis under CEQA and a discretionary approval process by the lead agency.[1341]

With regard to economic and population expansion and growth, the Draft EIR appropriately first considers impacts in relation to regional planning efforts and growth projections. This is consistent with CEQA requirements as discussed above in this response. The Project accommodates a projected demand for residential development in the North Los Angeles County Subregion and in the West EOA. It is consistent with population and housing projections included in the AVAP, demographic projections in the 2012-2035 RTP/SCS at the TAZ level, and household and employment projections in the 2016-2040 RTP/SCS at the TAZ level.[1342] The resident population of the Project at buildout is 82.46 percent of the projected resident population of TAZ 20280000 and TAZ 20281000 by 2035, but exceeds SCAG projections for 2040.[1343] The 2016 RTP/SCS states that TAZ level data or any data at a geography smaller than the jurisdictional level is included in the draft growth forecasts for regional modeling purposes only, and is advisory and nonbinding. Overall, the Project is consistent with the 2016-2040 RTP/SCS. Population, housing, and economic growth relative to the SCAG RTP/SCS would be less than significant as it relates to the exceedance of regional population projections.[1344]

The Draft EIR next considers impacts specific to the Project as proposed. It would include shopping, entertainment, recreation, institutional, and health care uses, which would serve residential development on the site but which the EIR concludes could also foreseeably induce growth locally and/or regionally by supporting visitors to the area that are not residents of the Project.[1345] Long-term growth, should it occur, would primarily be in the form of an economic responses to the presence of an increased resident population and employment opportunities that would occur on the Project site and that could, in turn, incrementally increase the area's demand for local goods and services, while increased Project-related employment opportunities could induce regional economic growth.[1346] Taking all of the above into account, the Draft EIR conservatively concludes that the existence of the Project makes it reasonably foreseeable that additional development proposals seeking AVAP amendments, which could result in a significant impact on the environment, would be made outside the West EOA, which is considered a significant, adverse, indirect growth-inducing impact.[1347]

The Commenter's opinion that Draft EIR Section 6.0, *Growth-Inducing Impacts* should be longer and include more in-depth analysis of the potential induced growth described in the Draft EIR is noted for the record and will be provided to the Regional Planning Commission

1341 *Ibid.*
1342 *Id.,* p. 6-8
1343 *Ibid.*
1344 *Ibid.*
1345 *Ibid.*
1346 *Id.,* p. 6-9
1347 *Ibid.*

and Board of Supervisors. However, the Lead Agency disagrees. The Draft EIR discussion of reasonably foreseeable growth impacts is consistent with courts' interpretations of the test articulated in *Napa Citizens*, and further analysis would be unduly speculative. As noted above, the court in *Napa Citizens* articulated criteria to determine the depth of growth-inducing analysis required in an EIR, and explained that they include "the nature of the project, the directness or indirectness of the contemplated impact and the ability to forecast the actual effects the project will have on the physical environment. In addition, it is relevant, although by no means determinative, that future effects will themselves require analysis under CEQA."[1348]

In *Clover Valley Foundation v. City of Rocklin* (2011) 197 Cal.App.4th 200 ("*Clover Valley*"), the City of Rocklin approved a 622-acre development including 558 homes, a 5.3-acre park, 5.0-acre commercial site, 1.0-acre site for a future fire station, 366 acres of open space, and related infrastructure and streets.[1349] Challengers alleged the EIR failed to adequately analyze the growth-inducing impacts of a proposed sewer pipeline which was part of the project, but the court disagreed.[1350] The EIR and responses to comments received on it recognized that the sewer improvements would provide part of the infrastructure required later to undertake construction of additional housing to north and south of the project, thereby removing an obstacle to development.[1351] The court held that under the *Napa Citizens* criteria, "no further detail or analysis was required of the potential impacts the additional planned development could cause," for three reasons.[1352] With regard to the first *Napa Citizens* criteria, the "nature of the project", the court explained that no further detail was required because the nature of the sewer improvement element of the project was "not to facilitate additional development after the project is completed," but rather was intended "first to meet the needs of the current project."[1353] Under the second criteria, the court concluded that no further detail was required because the anticipated impact would be *indirect,* since the sewer line would provide essential capacity for additional housing, but would remove only one of potentially numerous obstacles and approval requirements for developing additional housing that may arise when and if any such applications are submitted.[1354] Finally, the court explained that no further analysis was required in the EIR for this project because "any future effects of that additional development will undergo CEQA analysis" and the "growth has already been analyzed in the City's general plan EIR and was contemplated in the general plan and the SPMUD Master Plan."[1355] Because "the possible development's general impacts had already been considered and approved on a program level…CEQA did not require the City to redo that analysis in this project EIR as part of the growth-inducing impacts analysis."[1356]

[1348] *Napa Citizens* at 369
[1349] *Clover Valley* at 207
[1350] *Id.,* at 210, 227
[1351] *Id.,* at 227
[1352] *Ibid.*
[1353] *Ibid.*
[1354] *Id.,* at 228
[1355] *Ibid.*
[1356] *Ibid.*

The Draft EIR recognizes that although the limited size of Project infrastructure and service facilities would not directly cause growth beyond the Project, it is possible that indirectly caused growth could occur because nearby landowners could propose connections to these facilities in the future.[1357] Likewise, it recognizes that while Project uses including shopping, entertainment, recreation, institutional, and health care facilities are intended to serve on-site residential uses, the increased services and employment opportunities could cause the indirect impact of inducing local and regional growth by attracting visitors and creating a desire for goods and services nearby.[1358] The Draft EIR therefore concludes that the existence of the Project could foreseeably result in proposals for additional development outside the West EOA, which would be a significant, adverse indirect growth-inducing impact.

This depth of analysis is appropriate under *Napa Citizens* and *Clover Valley*. First, Project development, infrastructure, and services will be sized only to accommodate Project demand, and there is no intention for Project development to facilitate or support further development. As explained in the Draft EIR, infrastructure will not be sized to accommodate growth beyond that proposed for the Project, onsite renewable energy will only be supplied to Project structures, the Project will not create extra potable water for use outside of Project boundaries, the Project wastewater reclamation facilities would only treat Project water rather than any outside water, and Project roads are internal and not sized to support regional traffic.[1359] Like in *Clover Valley*, the purpose of Project development, infrastructure, and services "is first to meet the needs of the current project. And the nature of the project is not to facilitate additional development."[1360]

Second, like in *Clover Valley*, although reasonably foreseeable, potentially significant growth impacts in the surrounding area would be indirect. Further, the potential impacts are out of Project Applicant control, are uncertain, and would be constrained by several legal and practical impediments. Constraints on development include County policies directing development within EOAs, which would make it more difficult and unlikely for an applicant to obtain approval for development outside an EOA; the 2008 Conservation and Land Use Agreement (see response to Comment F.8-50 for further discussion of the agreement); an adjudication judgment that strictly limits withdrawals from the Antelope Valley Groundwater Basin; the existence of the San Gabriel Mountains and Angeles National Forest south of the Project site, both of which are constrained by physical limitations and government ownership; and the existence of the Los Padres National Forest and the Hungry Valley State Vehicular Recreation Area to the west of the Site, which are similarly expected to remain undeveloped.[1361] Third, as noted in *Clover Valley*, any future effects of additional development will undergo CEQA analysis. For all of the above reasons, the impact analysis contained in Draft EIR Section 6.0, Growth-Inducing Impacts is consistent with CEQA requirements, and no additional analysis is required.

[1357] DRP 2017, pp. 6-7, 6-8
[1358] *Id.,* pp. 6-8 and -9
[1359] *Id.,* pp. 6-6 and -7
[1360] *Clover Valley* at 227
[1361] DRP 2017, pp. 6-4 to -6

Response to Comment F.8-48:

The Commenter's opinion that Draft EIR Section 6.0, Growth-Inducing Impacts, should be longer and include more in-depth analysis of the potential induced growth described in the Draft EIR is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors. However, the Lead Agency disagrees. The Draft EIR discussion of reasonably foreseeable growth impacts is consistent with courts' interpretations of the test articulated in *Napa Citizens*, and further analysis would be unduly speculative.

As is addressed more fully in response to Comment F.8-47, the impact analysis contained in Draft EIR Section 6.0, Growth-Inducing Impacts, is consistent with CEQA requirements, and no additional analysis is required.

Response to Comment F.8-49:

The Draft EIR appropriately references analysis included in the AVAP EIR. The Draft EIR analysis of growth-inducing impacts uses the AVAP EIR as a forecasting tool to independently evaluate reasonably foreseeable regional growth patterns and population trends. The potential implementation of the Project was known at the time of the development of the AVAP and was accounted for in the AVAP's land use and population/employment growth assumptions. The Draft EIR determined that the Project is consistent with allowable land use and development densities and intensities in the AVAP. Draft EIR discussion of prior analysis in the AVAP EIR is reasonably understood as an incorporation of the evidentiary value of that analysis into the Draft EIR, which independently determined that the Project would not result in significant growth-inducing impacts related to approved County and regional plans after reaching the same conclusions as the AVAP EIR regarding foreseeable growth patterns and population trends.

The Draft EIR does not avoid Project-specific discussion of growth-inducing impacts. Rather, after its independent evaluation of the reasonably foreseeable regional growth patterns and population trends described in the AVAP EIR, the Draft EIR appropriately focuses the remaining analysis in Section 6.0, *Growth-Inducing Impacts* on potential, reasonably foreseeable growth-inducing impacts that are peculiar and specific to the Project and its exact location. To focus the analysis, the Draft EIR first discusses growth constraints near the Project site that limit the ability of the Project to influence growth, including a 2008 Conservation and Land Use Agreement between Tejon Ranch Company and Resource Groups that precludes development in approximately 240,000 acres of open space set aside in the agreement, the San Gabriel Mountains and Angeles National Forest south of the Project site, the Los Padres National Forest and Hungry Valley State Vehicular Recreation Area to the west of the Project site, legally limited water supply in the Antelope Valley, and related provisions in the County General Plan which require focusing new development in designated locations including the West EOA in which the Project site is located.[1362] As a result of the above constraints, the Draft EIR identifies the limited locations near the Project site where the only foreseeable induced growth could occur – these include areas west of the Project site from Quail Lake along SR-138 to the I-5 and northward along the eastern side to

[1362] *Id.*, pp. 6-4 and -5

Gorman, areas east of the Project site along the SR-138 corridor and inside the West EOA, and areas east of the Project site that are outside of the West EOA near Neenach and toward the cities of Lancaster and Palmdale.[1363]

Taking the above context into account, the Draft EIR evaluates the Project's potential to cause significant growth-inducing impacts under four criteria, including whether the Project would remove obstacles to growth, whether the Project would result in the need to expand one or more public services to maintain desired levels of services, whether the Project would encourage or facilitate economic effects that could result in other activities significantly impacting the environment, or if approval would involve precedent-setting actions that could encourage and facilitate other activities that could significantly affect the environment.[1364] Under the first and second criteria, the Draft EIR notes that project infrastructure and services would be sized to accommodate the Project population only, and as such would not directly lead to growth in surrounding areas.[1365] No new electrical production plants or natural gas facilities are part of the proposed Project, and renewable energy generated onsite would be used only by the Project.[1366] The Project would not generate extra potable water that could be used to support additional development, and the Project's wastewater reclamation facilities would only treat Project-related water.[1367] Internal Project roads would not be sized to support regional traffic flows and would not provide access to other areas outside of Project boundaries.[1368] The Project will add fire and police stations, libraries, and schools to support the anticipated population associated with the Project, but these service facilities will be scaled to serve the Project only.[1369] However, the Draft EIR recognizes the possibility that future nearby landowners could propose to connect to or build upon the Project's infrastructure to serve future development, and could recognize the benefits of Project services and propose further services and development.[1370] The Draft EIR appropriately discloses these possibilities, and further discussion would be unduly speculative because they are uncertain events, are not part of the Project, and are outside of the Project Applicant's control. Further, the potential for these impacts to occur is limited by the growth constraints near the Project site, and as noted in the Draft EIR, any such proposals would be subject to environmental analysis under CEQA and a discretionary approval process by the lead agency.[1371]

With regard to economic and population expansion and growth, the Draft EIR appropriately first considers impacts in relation to regional planning efforts and growth projections. This is consistent with CEQA requirements as discussed above in this response. The Project accommodates a projected demand for residential development in the North Los Angele County Subregion and in the West EOA. It is consistent with population and housing projections included in the AVAP, demographic projections in the 2012-2035 RTP/SCS at the

1363 *Id.,* pp. 6-5 and -6
1364 *Id.,* pp. 6-6 to -9
1365 *Id.,* pp. 6-7 and -8
1366 *Ibid.*
1367 *Id.,* p. 6-7
1368 *Ibid.*
1369 *Ibid.*
1370 *Id.,* pages 6-6 to -8
1371 *Ibid.*

TAZ level, and household and employment projections in the 2016-2040 RTP/SCS at the TAZ level.[1372] The resident population of the Project at buildout is 82.46 percent of the projected resident population of TAZ 20280000 and TAZ 20281000 by 2035, but exceeds SCAG projections for 2040.[1373] The 2016 RTP/SCS states that TAZ level data or any data at a geography smaller than the jurisdictional level is included in the draft growth forecasts for regional modeling purposes only, and is advisory and nonbinding. Overall, the Project is consistent with the 2016-20140 RTP/SCS. Population, housing, and economic growth relative to the SCAG RTP/SCS would be less than significant as it relates to the exceedance of regional population projections.[1374] The Draft EIR next considers impacts specific to the Project as proposed. It would include shopping, entertainment, recreation, institutional, and health care uses, which would serve residential development on the site but which the EIR concludes could also foreseeably induce growth locally and/or regionally by supporting visitors to the area that are not residents of the Project.[1375] Long-term growth, should it occur, would primarily be in the form of an economic responses to the presence of an increased resident population and employment opportunities that would occur on the Project site and that could, in turn, incrementally increase the area's demand for local goods and services, while increased Project-related employment opportunities could induce regional economic growth.[1376] Taking all of the above into account, the Draft EIR conservatively concludes that the existence of the Project makes it reasonably foreseeable that additional development proposals, which could result in a significant impact on the environment, would be made outside the West EOA, which is considered a significant, adverse, indirect growth-inducing impact.[1377]

Draft EIR analysis is consistent with CEQA requirements, and no further analysis is required. For further discussion regarding appropriate analysis in Draft EIR Section 6.0, Growth-Inducing Impacts, see responses to Comments F.8-47 and F.8-48.

Response to Comment F.8-50:

As noted by the Commenter, Draft EIR Section 6.0, Growth-Inducing Impacts, discusses the Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA). On June 17, 2008, the Tejon Ranch Company entered into the TRCRWA with Audubon California, the Endangered Habitats League, Natural Resources Defense Council, the Planning and Conservation League, and the Sierra Club ("Resource Groups").[1378] It covers the Project site and allows Tejon Ranch Company and its partners to pursue development approvals on the Project site, while providing for the designation of permanent open spaces and the dedication or sale of conservation easements over approximately 240,000 acres (or 90 percent) of the Ranch, without challenge from the Resource Groups.[1379] The agreement provides for permanent preservation through a combination of donated conservation

[1372] *Id.,* p. 6-8
[1373] *Ibid.*
[1374] *Ibid.*
[1375] *Ibid.*
[1376] *Id.,* p. 6-9
[1377] *Ibid.*
[1378] *Id.,* p. 6-4
[1379] *Ibid.*

easements, conservation easement acquisition areas, and designated open space areas within future development areas.

The TRCRWA is relevant to a discussion of growth-inducing Project impacts because it is one of several factors that constrains development in the areas immediately surrounding the Project site, limiting the Project's potential for growth inducement in covered areas. The Draft EIR accurately describes the areas constrained by the Conservation Agreement as the 240,000 acres set aside in the agreement, and includes Exhibit 3-2, Project Vicinity Map, which depicts the boundaries of Ranch-owned lands constrained by the agreement.[1380] The Commenter has in fact previously challenged discussion of the TRCRWA in the Grapevine Specific and Community Plan EIR (SCH# 2014041005) with regard to biological impacts related to the California condor, but the reviewing court ruled that such discussion in EIR analysis was entirely appropriate.[1381]

Further, the Draft EIR does not limit discussion of growth-inducing impacts to Ranch-owned property. Rather, it takes development constraints on other surrounding lands to the west, northwest, and south into account[1382] and acknowledges that there are limited areas adjacent to the Project site that could experience growth, which are 1) areas to the west of the Project site from Quail Lake, along SR-138 to the I-5, and northward along the eastern side of I-5 to Gorman; 2) areas east of the Project site along the SR-138 corridor, which are also included in the West EOA; and 3) areas east of the Project site near Neenach and toward the cities of Lancaster and Palmdale, which are outside the West EOA.[1383] Neither does the Draft EIR avoid considering growth-inducing impacts for the Project. Rather, potential growth-inducing impacts are appropriately analyzed, as discussed further in responses to Comments F.8-47, F.8-48, and F.8-49.

With regard to availability of the TRCRWA, the Lead Agency notes that it is publicly available online[1384], as filed with the SEC. The Commenter has also had access to the TRCRWA on several prior occasions, including as Appendix D to the Tehachapi Uplands Multiple Species Conservation Plan on which the Commenter provided comments, as cited in the Grapevine Specific and Community Plan Project EIR (SCH# 2014041005) on which the Commenter provided comments, and as summarized in Appendix J-1 to the Tejon Mountain Village EIR (SCH# 2005101018) on which the Commenter provided comments. For informational purposes, in response to the Commenter's request, the TRCRWA is hereby added as Appendix 5.7-D to the Final EIR.

With regard to the effect of and enforceable nature of the TRCRWA, see response to Comment F.8-51.

1380 *Ibid.*; *Id.,* Exhibit 3-2

1381 Order Denying Petition for Writ of Mandate and Judgment in Favor of Respondents and Real Parties in Interest, *Ctr. for Biological Diversity v. Kern Cty.*, No. S-1500-CV-286902 KCT (Kern Cnty. Sup. Ct. Dec. 8, 2010) at pages 23-24, 26

1382 DRP 2017, pp. 6-4 and -5

1383 *Id.,* page 6-5

1384 Available at http://www.secinfo.com/d14D5a.t46Xm.c.htm#1stPage.

Response to Comment F.8-51:

The TRCRWA is described for informational purposes in the Draft EIR but is not a part of the Project and is not a mitigation measure for the Project. The Draft EIR does not rely upon the TRCRWA to mitigate growth-inducing impacts, nor would it be appropriate to do so, considering that as noted by the court in *Napa Citizens*, "Neither CEQA itself, nor the cases that have interpreted it, require an EIR to anticipate and mitigate the effects of a particular project on growth in other areas."[1385] Nor does the Draft EIR rely on the TRCRWA to mitigate biological resource impacts, as addressed further in response to Comment F.8-180. Rather, it is particularly relevant to a discussion of growth-inducing Project impacts because it is one of several factors that constrains development in the areas immediately surrounding the Project site, limiting the Project's potential for growth inducement in covered areas. The Draft EIR accurately describes the areas constrained by the TRCRWA as the 240,000 acres set aside in the agreement, and includes Exhibit 3-2, Project Vicinity Map, which depicts the boundaries of Ranch-owned lands constrained by the agreement.[1386]

The TRCRWA created a new, independent, nonprofit conservancy, the Tejon Ranch Conservancy. The mission of the Conservancy is to administer the Ranch-wide Management Plan (RWMP) to preserve and enhance the native biodiversity and ecosystem values of designated open space areas of Tejon Ranch and to implement best management practices for ongoing historical uses of Tejon Ranch for the benefit of future generations. In June 2013, the Conservancy Board of Directors adopted the first, Conservancy-prepared RWMP for Tejon Ranch, and it will continue to be updated every 5 years. Where applicable, the Tejon Ranch Conservancy holds all conservation easements over conserved lands.

With regard to TRCRWA enforceability, the Commenter is incorrect. The agreement is fully enforceable by all parties and includes remedies that compel specific performance of the obligations set forth in the agreement, as set forth in TRCRWA Section 12, Remedies.

Response to Comment F.8-52:

The Commenter's opinion is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors. However, the Draft EIR conclusion that sizing infrastructure to serve only the Project would not lead to a direct, growth-inducing impact is consistent with CEQA requirements. Growth-inducing impacts typically result if a project provides new infrastructure that is oversized and can be used to serve other projects. Per CEQA Guidelines Section 15126.2(d), "a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas" and therefore cause a potentially significant impact by removing an impediment to growth. Courts have agreed that project construction of oversized infrastructure that can serve homes or business in addition to those planned for the project removes an impediment to growth, causing a potential growth-inducing impact. In *Clover Valley Foundation v. City of Rocklin* (2011) 197 Cal.App.4th 200, an EIR evaluating a 558-home project concluded that an off-site sewer pipeline constructed as part of the project, which would serve the project homes plus a

[1385] *Napa Citizens* at 371)
[1386] DRP 2017, p. 6-4; *Id.,* Exhibit 3-2

possible additional 524 homes, removed an obstacle to future growth and therefore caused a growth-inducing impact.[1387] The court found this appropriate under CEQA Guidelines Section 15126.2(d).[1388] However, growth-inducing impacts can be precluded where the infrastructure is sized to serve only the project, particularly if there are further physical or legal constraints on development in surrounding areas.[1389]

As such, in its discussion of potential growth-inducing impact by removing obstacles to growth, the Draft EIR appropriately notes that the potential for such impacts are limited because Project infrastructure facilities are not sized to accommodate growth beyond that which is proposed for the Project.[1390] Renewable energy generated on-site would only be used for Project uses; the Project would not generate extra, potable water and proposed wastewater reclamation facilities would only be large enough to treat Project-related water; and new Project roads would be internal, are limited to the boundaries of the Project, and are not sized to accommodate regional traffic.[1391] However, the Draft EIR acknowledges that future development proposals are out of its control, and therefore concludes that future nearby landowners could propose to connect to or build upon the Project's infrastructure.[1392] As further discussed in responses to Comments F.8-47 and F.8-48, the above-described discussion of the potential complies with CEQA requirements.

Response to Comment F.8-53:

The Commenter's opinion is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors. However, the Lead Agency disagrees. The Commenter provides incomplete citations to Draft EIR Sections 5.9, *Population, Housing, and Employment* and 6.0, Growth-Inducing Impacts, which appear to reveal inconsistences. However, when considered in context, the Draft EIR's analyses and conclusions in Sections 5.9, and 6.0 are consistent, the Draft EIR adequately analyzes impacts, and explains that there is no feasible mitigation for the significant impact identified in Section 5.9.

First, in Section 5.9, the Draft EIR properly and conservatively evaluates Project impacts against the existing baseline to determine the significance of population and housing growth. Under Threshold 9-1, the Draft EIR asks "Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?"[1393] The Draft EIR properly concludes that because the Project would substantially increase population and housing relative to the existing Project site conditions, it would have a significant and unavoidable impact under Threshold 9-1.[1394] The Draft EIR also evaluates the Project's impacts under Threshold 9-4, which asks "Would the project cumulatively exceed official regional or local population projections?," and under this threshold appropriately concludes

1387 *Clover Valley Foundation* at 225-2256
1388 *Id.,* at 227
1389 Stephen Kostka and Michael Zischke, Practice Under the Environmental Quality Act, 2d ed Cal CEB §13.55
1390 DRP 2017, p. 6-6
1391 *Id.,* pp. 6-6 and -7
1392 *Id.,* p. 6-7
1393 *Id.,* p. 5.9-23
1394 *Id.,* pp. 5.9-23 to -32

that the Project would have a less than significant impact.[1395] This is because implementation of the Project would accommodate the growth anticipated by the reasonably foreseeable projections described in the AVAP and by SCAG projections in the 2012-2035 RTP/SCS and 2016-2040 RTP/SCS, and would create employment opportunities on the site at a ratio of 1.22 at buildout, helping the County to attain its targeted jobs/housing ratio of 1.3 jobs per dwelling unit.[1396] The Project would contribute to meeting the RHNA housing production goals for the County and would be consistent with the regional effort to boost housing production in unincorporated areas of Los Angeles County to meet regional housing needs, and would achieve the economic development objectives for the Antelope Valley through development of a balanced urban development located adjacent to critical transportation and water infrastructure.[1397] Under Threshold 9-4, Project impacts would be less than significant because the Project implements and is consistent with the AVAP and SCAG RTP/SCS, and no mitigation is required. While the Draft EIR discusses Thresholds 9-1 and 9-4 together because they are related, its conclusions are not inconsistent. The Draft EIR clearly concludes that impacts are less than significant with regard to consistency with regional plans (Threshold 9-4), but significant and unavoidable with regard to overall growth on the site in comparison to existing conditions (Threshold 9-5).

Similarly, with regard to growth-inducing impacts, the Draft EIR comes to differing conclusions when analyzing direct Project growth in relation to regional planning and anticipated regional growth projections, versus reasonably foreseeable indirect growth-related impacts in the areas around the Project site that are out of the Applicant's control. In Section 6.0, an appropriate first step in the Draft EIR analysis is to consider Project consistency with household and employment growth trends anticipated for the region, and with regional policies to sustainably accommodate said anticipated growth. The Draft EIR therefore appropriately considers Project consistency with growth projections and population trends in the 2012-2035 SCAG RTP/SCS and 2016-2040 SCAG RTP/SCS, and the AVAP.[1398] The potential implementation of the Project was known at the time of the development of the AVAP, and it was accounted for in the AVAP's land use and population/employment growth assumptions, as well as implementation program. As noted in the Draft EIR, the AVAP EIR fully evaluated the growth-inducing impacts of buildout of the unincorporated areas of the Antelope Valley under AVAP policies that focus dense development in EOAS such as the West EOA, within which the Project site is located. The Draft EIR determined that the Project is consistent with allowable land use and development densities and intensities in the AVAP. Draft EIR discussion of prior analysis in the AVAP EIR is reasonably understood as an incorporation of the evidentiary value of that analysis into the Draft EIR, which independently determined that the Project would not result in significant growth-inducing impacts related to the approved County and regional plans after reaching the same conclusions as the AVAP EIR regarding foreseeable growth patterns and population trends. The Draft EIR also notes that the Project is consistent with demographic projections in the 2012-2035 RTP/SCS at the TAZ level, and household and employment projections in the 2016-2040 RTP/SCS at the TAZ level. As such, the full citation from the

1395 *Id.,* p. 5.9-31
1396 *Ibid.*
1397 *Id.,* pp. 5.9-28 and -31
1398 *Id.,* pp. 6-3 to -5, -8 to -9

Draft EIR is as follows: "Therefore, the Project, as planned, *would not result in significant growth-inducing impacts related to approved County and regional plans*" (emphasis added).[1399]

The Draft EIR next conducts a Project-specific analysis of potential growth-inducing impacts on areas surrounding Project site. The Project would include shopping, entertainment, recreation, institutional, and health care uses, which would serve residential development on the site but which the EIR concludes could also foreseeably induce growth locally and/or regionally by supporting visitors to the area that are not residents of the Project.[1400] Long-term growth, should it occur, would primarily be in the form of an economic responses to the presence of an increased resident population and employment opportunities that would occur on the Project site and that could, in turn, incrementally increase the area's demand for local goods and services, while increased Project-related employment opportunities could induce regional economic growth.[1401] Taking all of the above into account, the Draft EIR conservatively concludes that "*the existence of the Project makes it reasonably foreseeable that additional development proposals seeking AVAP amendments, which could result in a significant impact on the environment, would be made outside the West EOA, which is considered a significant, adverse, indirect growth-inducing impact*.[1402] This conclusion is not inconsistent with an independent observation that the Project itself is consistent with growth projections and assumptions in the AVAP, AVAP EIR, 2012-2035 SAG RTP/SCS, and 2016-2040 SCAG RTP/SCS, but rather is an acknowledgement that potential indirect Project impacts cannot be measured by consistency with regional plans alone, and the Project Applicant cannot ensure future development proposals will also be consistent with County and regional plans.

The Commenter also points out that the Draft EIR at page 5.9-27 says "the Project would not lead to substantial growth on the Project site." This statement appears in the context of a discussion regarding planned regional growth as evaluated in the AVAP.[1403] The statement was intended to convey that the Project would not create substantial unplanned growth, because it does not represent a large portion of the future growth planned for the Project site and surrounding area. In response to this comment, the following clarifying correction is made to Draft EIR page 5.9-27, as shown in double underline:

> Since the Project's estimated population of 57,150 residents would represent 14.1 percent of the buildout population of the Antelope Valley's unincorporated area, the Project would not be taking up a large portion of future growth planned for the area. Rather, it would result in a population increase that would be in accordance with County projections and, within the context of County planning, would not lead to substantial unanticipated growth on the Project site or in the Antelope Valley.

1399 *Id.,* p. 6-9
1400 *Ibid.*
1401 *Id.,* p. 6-9
1402 *Ibid.*
1403 *Id.,* pp. 5.9-26 and -27

With regard to mitigation of the significant impact identified in Draft EIR Section 5.9, in light of Project Objectives discussed in Draft EIR Section 4.0, Project Description, there is no appropriate and feasible mitigation to reduce the significant impact under Threshold 9-1.[1404] CEQA Guidelines specify that an EIR shall include "feasible" mitigation measures which could minimize significant adverse project impacts.[1405] The feasibility of mitigation measures must be considered in light of Project objectives, which "should include the underlying purpose of the project."[1406] The underlying purpose of the Project stems from the need for a sustainable community in the greater Los Angeles County region that creates a balance among residential, commercial, and other employment-generating uses and institutional/public uses, while being sensitive to the environment.[1407] This is consistent with the growth projections, visions, assumptions, goals, and policies of the AVAP and 2012-2035 and 2016-2040 SCAG RTP/SCS, as noted above. The AVAP uses four types of environments to facilitate the preservation of rural areas of the Antelope Valley and focus development in appropriate areas, including Rural Preserve Areas, Rural Town Areas, Rural Town Centers, and Economic Opportunity Areas (EOAs). An EOA is defined as a cluster of land with higher development densities along the routes of two proposed major infrastructure projects in the Antelope Valley – the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[1408] The Project site is located entirely within the West EOA.[1409]

Pursuant to the above, the first Project Objective expressed in Draft EIR Section 4.0, Project Description, is "Implement the Antelope Valley Area Plan (AVAP) by creating an environmentally and economically sustainable master-planned community on the Project site to help accommodate planned regional population and economic growth within the West EOA."[1410] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses".[1411] Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure".[1412] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[1413] The Project has been designed to achieve the above-described AVAP goals, as the Draft EIR explains in its Project Objectives. Therefore, while the Project would substantially increase population and housing relative to the existing Project site conditions, which is a significant impact under Draft EIR Threshold 9-1,

1404 *Id.,* pp. 7-19, 5.9-31
1405 CCR §15126.4(a)(1)
1406 *Id.,* §15124(b)
1407 DRP 2017, p. 4-3
1408 DRP 2015, p. I-8
1409 *Id.,* pp. 4-3 and -4
1410 DRP 2017, p. 4-4
1411 DRP 2015, p. I-8
1412 *Ibid.*
1413 *Ibid.*

this impact is appropriately considered significant and unavoidable. Any potential mitigation such as a significant reduction in the Project's proposed unit count and commercial square footage would result in a development proposal that is not consistent with the goals and policies of the AVAP related to the development within the West EOA, and therefore would not support Project Objectives.

With regard to the analysis of and mitigation of foreseeable indirect potential growth-inducing impacts discussed in Draft EIR Section 6.0, as noted by the court in *Napa Citizens*, "Neither CEQA itself, nor the cases that have interpreted it, require an EIR to anticipate and mitigate the effects of a particular project on growth in other areas."[1414] As such, Draft EIR Section 6.0, Growth-Inducing Impacts, appropriately discloses and analyzes potential indirect growth-inducing impacts, specifically the potential for the Project to lead to further proposals for development, but it does not include a discussion of mitigation for the impacts of such reasonably foreseeable development. This does not frustrate "CEQA's fundamental goal" of "fostering informed decision making," and ensuring that "the public be fully informed as to the environmental consequences of action by their public officials," as expressed in *Laurel Heights Improvement Assn v. Regents of University of California* (1986) 47 Cal.3d 376, 402, 404 ("*Laurel Heights*"). The Project Draft EIR is consistent with this fundamental CEQA goal, whereas the EIR in *Laurel Heights* was not. In *Laurel Heights*, challengers alleged that an EIR prepared for a project moving a school of pharmacy from one campus to another building was insufficient, because it only evaluated the impacts of using the immediately available 100,000 square feet in the new building, and did not evaluate foreseeable future impacts when the remainder of the building eventually became available for use.[1415] The court agreed, explaining that the future use was a foreseeable element of the project whose impacts should have properly been evaluated in the EIR, and articulating a test that an EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects."[1416]

By comparison, the Draft EIR fully and consistently defines the scope of development, which is a maximum of 19,333 dwelling units, approximately 7,363,818 square feet of Business Park uses, 1,034,550 square feet of Commercial uses, 1,568,160 square feet of Institutional/Civic uses, 130,680 of Recreation/Entertainment uses, and 5,624 acres of Open Space.[1417] The Draft EIR includes proposed infrastructure and service use locations, and sufficiently describes the process for future Tract Map approval for Project refinement. The Draft EIR fully analyzes Project impacts, both during the approximately 20 years of buildout and during foreseeable future operations. It also appropriately discloses and analyzes growth-inducing impacts, as discussed more fully in responses to Comments F.8-47, F.8-48, and F.8-49. The Draft EIR and Specific Plan do not make conflicting representations regarding the scope, impact of or any other aspect of the Project and do not obscure the Project's purpose and planned development components. The Draft EIR does not make, and

1414 *Napa Citizens* at 371
1415 *Laurel Heights* at 393, 394
1416 *Id.,* at 394-396
1417 DRP 2017, p. 4-6

the comment does not provide a citation to any inconsistent statement about the scope of the development in any way comparable with the findings in *Laurel Heights*.

Response to Comment F.8-54:

The Commenter's opinion regarding inconsistent analysis is noted and will be provided to the Regional Planning Commission and Board of Supervisors. However, the Lead Agency disagrees, and Draft EIR Project description and impact analysis are consistent and comply with CEQA, as also discussed in response to Comment F.8-53.

Specifically, with regard to traffic impacts, Draft EIR Section 5.10, Traffic Access and Circulation, as supplemented and updated in this Final EIR, fully and accurately discloses foreseeable impacts due to Project construction and operations, and identifies mitigation measures to reduce impacts to the extent feasible. As noted by the Commenter, with mitigation incorporated, the Draft EIR concludes that traffic-related Project impacts would be less than significant.[1418] It is recognized that, if Caltrans does not implement the improvements outlined in the mitigation measures in the manner or within the timeframe needed to serve the Project, significant and unavoidable direct impacts to traffic circulation may result.[1419]

However, this is limited to Project-related impacts. The potentially significant impact identified in Draft EIR Section 6.0, Growth-Inducing Impacts, is related to foreseeable future development that could be proposed by others. These potential future development projects are not part of the Project, and cannot reasonably be evaluated with more detail than they are in Section 6.0. Further, CEQA does not require such analysis, and the Draft EIR contains an appropriate depth of analysis of these potential impacts, as is more fully discussed in responses to Comments F.8-47, F.8-48, and F.8-49. The Lead Agency acknowledges that such potential impacts could include traffic-related impacts associated with future, unrelated development proposals. However, an EIR need not evaluate speculative growth-inducing impacts of a project.[1420] Further, mitigation of such potential impacts is not required. As noted by the court in *Napa Citizens*, "Neither CEQA itself, nor the cases that have interpreted it, require an EIR to anticipate and mitigate the effects of a particular project on growth in other areas."[1421] As such, Draft EIR Section 6.0, *Growth-Inducing Impacts* appropriately discloses and analyzes potential indirect growth-inducing impacts, specifically the potential for the Project to lead to further proposals for development, but it does not include a discussion of mitigation for the impacts of such reasonably foreseeable development. The Draft EIR is consistent, the Commenter does not provide evidence disputing this conclusion, and no further analysis is required.

Response to Comment F.8-55:

The term "growth-accommodating" is used in the Draft EIR as a common sense term to describe the Project's relationship to reasonably foreseeable growth projections and

1418 *Id.,* p. 9-4
1419 *Ibid.*
1420 *Federation of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 CA4th 1252, 1265
1421 *Napa Citizens* at 371

population trends described in regional planning documents, including the Antelope Valley Area Plan (AVAP), 2012-2035 SCAG RTP/SCS, and 2016-2040 SCAG RTP/SCS. As discussed below, it is both appropriate for the Draft EIR to analyze and discuss the Project's consistency with and ability to accommodate growth anticipated in the AVAP and SCAG plans, and for the Draft EIR to include impact analyses regarding said consistency and growth accommodation in Section 5.9, Population, Housing, and Employment, and Section 6.0, Growth-Inducing Impacts.

The County adopted the AVAP in 2015 as a component of its General Plan in order to establish a comprehensive land use plan for the Antelope Valley, and the AVAP expressly states that it was prepared "[i]n anticipation of future growth" and is thus "focused on ways to manage this growth".[1422] To achieve this, the AVAP incorporates a "Rural Preservation Strategy." At its core, the AVAP's Rural Preservation Strategy is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment".[1423]The AVAP's Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development".[1424] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas (EOAs).[1425] The Project site is located entirely within the AVAP's West EOA.[1426] Per the Rural Preservation Strategy, EOAs are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[1427] During the AVAP community planning process, EOAs "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to [EOAs] so that the areas around them can be preserved and maintained at low density, or agricultural uses"[1428] Indeed, the very first policy described in the AVAP - Land Use Policy LU 1.1 – requires that the County "[d]irect the majority of the unincorporated Antelope Valley's future growth to … identified economic opportunity areas".[1429]

Accordingly, the AVAP Land Use Policy Map establishes land use designations for the Project site that correspond to the land use densities and intensities proposed by the Centennial Specific Plan, as shown on Exhibit 4-2a and as discussed in Section 5.8, Land Use, Entitlements, and Planning.[1430] Moreover, the AVAP expressly states its expectation that the Project site will be developed as a "master-planned community" pursuant to a "specific plan." The Project has accordingly been designed as a Specific Plan, and will comply with the vision,

[1422] DRP 2015, p. I-6
[1423] *Id.,* p. I-6
[1424] *Id.,* p. I-7; DRP 2014a, p. 7-7
[1425] *Ibid.*
[1426] DRP 2017, p. 4-4
[1427] DRP 2015, p. I-8
[1428] *Ibid.*
[1429] *Id.,* LU-3
[1430] DRP 2017, pp. 5.8-19 to -71

assumptions, goals, and policies of the AVAP. It is a Project objective to "Implement the Antelope Valley Area Plan (AVAP) by creating an environmentally and economically sustainable master-planned community on the Project site to help accommodate planned regional population and economic growth within the West EOA".[1431] It is therefore appropriate for the Draft EIR to discuss consistency with the AVAP and with the stated Project Objective of accommodating growth anticipated in the AVAP.

It is also appropriate to analyze potential Project-related impacts in relation to anticipated and planned-for regional growth, as discussed more fully in responses to Comments F.8-47 and F.8-48. The Draft EIR analysis of growth-inducing impacts uses the AVAP EIR as a forecasting tool to independently evaluate reasonably foreseeable growth patterns and population trends. The potential implementation of the Project was known at the time of the development of the AVAP and was accounted for in the AVAP's land use and population/employment growth assumptions. The Draft EIR determined that the Project is consistent with allowable land use and development densities and intensities in the AVAP. Draft EIR discussion of prior analysis in the AVAP EIR is reasonably understood as an incorporation of the evidentiary value of that analysis into the Draft EIR, which independently determined that the Project would not result in significant growth-inducing impacts related to approved County and regional plans after reaching the same conclusions as the AVAP EIR regarding foreseeable growth patterns and population trends.[1432]

The Draft EIR appropriately explains that the Project would accommodate growth that has already been anticipated and planned for in the AVAP and in both the 2012-2035 SCAG RTP/SCS and 2016-2040 SCAG RTP/SCS, and would not have a significant impact with regard to increased growth above that anticipated in said regional plans. Therefore, impacts would be less than significant in relation to planned growth in the region, and the Draft EIR explains this in detail in both Section 4.9, Population, Housing, and Employment, and Section 6.0, Growth-Inducing Impacts.[1433] The Draft EIR does not avoid an analysis of growth-inducing impacts, and its analysis of such potential impacts is consistent with CEQA requirements, as discussed in responses to Comments F.8-47, F.8-48, and F.8-49.

Response to Comment F.8-56:

The Northwest State Route 138 Corridor Improvement Project ("NW SR-138 Project") will widen SR-138 to provide operational and safety improvements and accommodate foreseeable increases in travel and goods movement in northern Los Angeles County due to anticipated regional growth. The Draft EIR discusses the NW SR-138 Project, including State Route (SR)-138 improvement alternatives, design, purpose and how the alternatives related to the Project's proposed circulation system in Section 4.0, Project Description, pages 4-39 to 4-41, Section 5.10, Traffic, Access, and Circulation, pages 5.10-34 to 5.10-36, and Section 7, Cumulative Impacts, pages 7-8 to 7-9. This information was based on the Draft EIR/EIS for the NW SR-138 Project which was circulated for public review and comment in July 2016. A Notice of Completion and Availability for the Project Draft EIR was filed by the County on

1431 *Id.,* p. 4-4
1432 DRP 2017, p. 6-9
1433 *Id.,* pp. 5.9-23 to -33; 6-1 to -2; 6-6 to -9

May 15, 2017 and the 60-day comment period began on May 17, 2017. Please note that some updates have been made to the Draft EIR discussion of the NW SR-138 Project, as discussed in responses to Comments F.8-26 and F.8-28.

The proposal and future implementation of the NW SR-138 Project is not a potential growth-inducing impact arising from the Project, and is therefore appropriately not discussed in the Draft EIR as a growth-inducing impact. The NW SR-138 Project is an entirely separate project from the Centennial Specific Plan Project, and has undergone its own environmental review process under CEQA. The NW SR-138 project was fully analyzed under CEQA and NEPA in the NW SR-138 Draft EIR and FEIR. The NW SR-138 Project has long been planned to accommodate anticipated regional growth that would occur with or without the Project, and was not induced by the Project. Caltrans considered widening SR-138 from I-5 to SR-14 in its 2004 North County Combined Highway Corridors Study, and Caltrans initiated the NW SR-138 Project to expand upon the 2004 study and evaluate specific operational improvements for SR-138 from I-5 to SR-14.[1434] The 2015 Federal Transportation Improvement Program (FTIP) lists federally funded projects and regionally significant projects for the period of 2014-2020, and it includes completion of the Project Approval and Environmental Documentation for alternative improvements to SR-138 from I-5 to SR-14. The 2016 RTP/SCS identifies new transportation investments to improve regional mobility and identifies the Northwest SR-138 Improvement Project as a major regional highway project needed to improve regional access to opportunities such as jobs, education, recreation and healthcare.[1435]

Moreover, anticipated regional growth was addressed in the Final SR-138 EIR.[1436] The EIR assumes growth projections included in the SCAG 2012 RTP/SCS.[1437] As discussed in response to Comment F.8-20, the growth projections described in the SCAG 2012 RTP/SCS include growth associated with the Project. As explained in the SR-138 EIR, "[widening SR-138] would not provide access to areas previously inaccessible or improve access in ways that would foster local development beyond that which is already planned, and would not affect the rate, amount, or type of growth envisioned in the Antelope Valley Area Plan. …. With or without [widening SR 138], residential growth within the regional area would continue to be limited by natural resource constraints (e.g., water availability/supply), as well as geographic and regulatory factors (e.g., Rural Preserve Areas) that would guide future development to rural town centers, rural town areas, and economic opportunity areas".[1438] Consistent with this EIR, the SR-138 determined that widening SR-138 would have negligible influence on regional growth and would not result in growth-related impacts.[1439]

1434 *Id.,* p. 5.10-34
1435 SCAG 2016a, pp. 100, 102
1436 Caltrans 2017b, p. 4-10
1437 California Department of Transportation (Caltrans). 2016 (July). Northwest State Route 138 Corridor Improvement Project: Draft Environmental Impact Report/Environmental Impact Statement and Section 4(F) Evaluation. Los Angeles, CA: Caltrans. https://www.metro.net/projects/nw138/nw138-DEIR-DEIS/.
1438 Caltrans 2017b, p. 446
1439 *Ibid.*

Response to Comment F.8-56A:

The Northwest State Route 138 Corridor Improvement Project Final EIR/EIS is noted and already included in the record, and its relationship to the Project is addressed in the Draft EIR and in response to Comment F.8-56.

Response to Comment F.8-57:

With regard to the proposed Pacific Crest Trail (PCT) realignment, specifically, the Forest Service, the PCTA, the Conservancy, and the Tejon Ranch Company are discussing the relocation of the existing segment of the PCT that currently crosses Lancaster Road at 270th Street West, approximately two miles east-southeast of the Project site, so that it is generally aligned along 300th Street West between SR-138 and the northeastern corner of the Project site, as shown on Draft EIR Exhibit 5.14-2.[1440] A portion of the western right-of-way of 300th Street West has been reserved for the conceptual PCT realignment where this conceptual realignment is contiguous with a portion the Project site and where it bisects the northeastern corner of the site.[1441] To facilitate the PCT realignment described in the Draft EIR, TRC has granted to the Conservancy two conservation easements that would preserve in perpetuity the conservation values of those portions of Tejon Ranch land located outside of the Project boundary and through which the proposed PCT alignment would extend.[1442] Both conservation easements expressly acknowledge that the Forest Service, the Conservancy, and TRC are in ongoing discussions regarding an alternative realignment for the PCT, and that TRC intends to convey to the Forest Service a perpetual trail easement for the construction, maintenance, and use of the PCT on the property covered by the conservation easements.[1443] Moreover, the Conservation Easements both expressly authorize public recreational use of the PCT on the conservation easement property and permit TRC to grant the trail easement to the Forest Service.[1444] Both Conservation Easements further acknowledge that, in October 2009, PCTA and Forest Service, among other parties, entered into a Memorandum of Understanding that delegates to PCTA certain responsibilities for the construction, maintenance and use of that segment of the PCT alignment to be located on the Conservation Easement property.[1445]

As explained in the Draft EIR, however, the proposed realignment of the PCT to the west side of 300th Street West through the Project site is not part of the Project.[1446] Nevertheless, the proposed PCT realignment is assumed to be the future alignment for evaluation purposes in the Draft EIR and is depicted on the Project's Recreation and Trails Plan.[1447] Moreover, the Draft EIR analysis includes consideration of the Project's potential impacts on the PCT and its users.[1448] The Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043) (AVAP EIR) also considered the environmental effects on the PCT associated

[1440] DRP 2017, p. 5.14-14
[1441] *Ibid.*
[1442] See Kern County Official Records Document Nos. 214047995, 20140445960 ("Conservation Easements")
[1443] Conservation Easements, Recital G
[1444] *Id.,* Sections 6(b)(2)(O)
[1445] *Id.,* Recital G
[1446] DRP 2017, 4-19
[1447] *Id.,* Exhibit 4-10a
[1448] *Id.,* pp. 5.7-138; 5.8-73; 5.12-20; 5.13-1, -8, -10 to -30; 5.14-3, -8, -10 to -22; 5.21-77

with buildout of the Project site in accordance with the Antelope Valley Area Plan.[1449] Further, when and if implemented, the PCT alignment would be a separate project with a separate environmental permitting process.[1450]

With regard to visual impacts, first, the proposed alignment is not final. It is expected that discussion among the stakeholders for the PCT realignment will continue, and further design considerations will be acknowledged and contemplated. Second, the Project's potential visual impact on the PCT and its uses were analyzed in Draft EIR Section 5.13, Visual Resources. Distant views of portions of the Project site are intermittently visible from segments of an approximate two-mile stretch of the trails that passes through the Three Points area.[1451] Due to distance and intervening topography, views of the Project site from the existing PCT alignment are very limited and do not substantially contribute to the visual experience of users of the existing PCT alignment.[1452] Users of the currently conceptual future PCT realignment along 300th Street West would have some direct views of portions of the Project site, the foothills, and the Tehachapi Mountains, as depicted in Draft EIR Exhibit 5.13-5. The Draft EIR acknowledges that views of the local foothills and/or Tehachapi Mountains would be partly obstructed by proposed structures.[1453] Development on the eastern section of the site would present trail users with views of residential, commercial, and business park structures along 300th Street West for a distance of approximately 1½ miles.[1454] Therefore, MM 13-4 requires that structures proposed along the PCT alignment be screened by a block wall along the rear of the structures and a wide, landscaped setback that would contain the conceptual PCT realignment. These features would ensure that the on-site urban uses in the foreground of views from the trail, as it passes through the site, would have limited visibility.[1455] The location and design of the conceptual PCT realignment is intended to be a similar (i.e., some rural/agricultural uses and some land development) to comparatively better than views from the existing alignment. Therefore, views from the conceptual future realignment of the portion of the PCT along 300th Street West would be reduced to a less than significant level.[1456]

Response to Comment F.8-58:

As disclosed in the Draft EIR, "There are no State-designated scenic highways within 20 miles of the Project boundaries; SR-138 is not a State scenic highway, nor is it eligible for listing.[1457] Thus, while there are features on and around the Project site that would be considered scenic by many, because these components of the overall visual character are not within the viewshed of a State-designated scenic highway, the proposed changes to the Project site

[1449] DRP 2014a, pp. 3-2; 4-15; 5.15-6, -11 to -16; 5.16-5; Figure 5.15-1
[1450] DRP 2017, p. 5.14-14
[1451] *Id.,* p. 5.13-10
[1452] *Ibid.*
[1453] *Id.,* p. 5.13-17
[1454] *Id.,* p. 5.13-21
[1455] *Ibid.*
[1456] *Ibid.*
[1457] California Department of Transportation (Caltrans). 2011 (September 7). California Scenic Highway Mapping System: Scenic Route (Los Angeles County). Sacramento, CA: Caltrans. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

would not result in impacts related to damaging scenic resources along a scenic highway."[1458]

While SR-138 is not a State-designated scenic highway, the Draft EIR analyzes and clearly acknowledges that the Project would cause substantive change in views from SR-138, which the AVAP identifies as a "Scenic Drive". The Antelope Valley Area Plan (AVAP) is the primary, underlying County planning document for the Project site. AVAP Goal COS 5 is to ensure that scenic resources, including Scenic Drives, can be enjoyed by future generations. To that end, Policy COS 5.2 indicates that the amount of potential development in Scenic Resource Areas should be very limited, and should instead be focused within Economic Opportunity Areas (EOAs). Focusing development in EOAs allows for expected growth and development in the AVAP area while also achieving AVAP Goal COS 5 by preserving scenic resources in areas outside the EOAs. The Project site is located within the Western EOA and is not within a Scenic Resource Area. Focusing development on the Project site is therefore consistent with AVAP Goal COS 5 and specifically with Policy COS 5.2. Further, AVAP Policy COS 5.7 ensures that development standards and guidelines are established for development within the viewsheds of Scenic Drives, and the Project will comply with such standards and guidelines. Impacts on SR-138 with regard to its status as a Scenic Drive in the AVAP would therefore be less than significant.[1459] Nonetheless, the Draft EIR acknowledges that the Project would result in significant and unavoidable impacts related to a change in visual character experienced from public vantage points, including SR-138, for which there is no feasible mitigation.[1460]

Response to Comment F.8-59:

With regard to light and glare, the Draft EIR discloses that the Project would cause new sources of light and glare during construction activities and during Project operation. With regard to construction activity impacts, motorists on SR-138 could be affected by light and glare from construction of new structures adjacent to it, which would be a significant impact absent mitigation.[1461] MM 13-5 requires that security lighting at the construction equipment and building material staging areas be directed away from roadways and existing residences, and that it be screened and directed away from on-site residences that have been occupied as each development phase is built.[1462] This security lighting would also be limited and temporary in nature. With MM 13-5 incorporated, impacts would be less than significant.[1463] With regard to long-term, operational light and glare, the Commenter is correct that the Project would introduce new light and glare sources into the Project site that would result in nighttime lighting and glare, and nighttime sky glow.[1464] Nighttime sources of light would include streetlights, vehicle headlights, and lights used in an around buildings, parking lots,

1458 DRP 2017, p. 5.13-2
1459 *Id.,* p. 5.13-24
1460 *Id.,* p. 5.13-20
1461 *Id.,* p. 5.13-26
1462 *Ibid.*
1463 *Ibid.*
1464 *Ibid.*

parks, and walking paths located on the Project site.[1465] These outdoor lighting sources would also cause increased sky glow in the area.[1466]

To reduce the above-identified impacts, PDF 13-3 has been incorporated into the Project, and all feasible mitigation has been identified and is required in MMs 13-2 and 13-6. PDF 13-3, and MM 13-2 require the implementation of detailed components of the Green Development Program listed on Draft EIR pages 5.13-29 and 5.13-30. MM 13-6 requires the preparation of an Exterior Lighting Plan in coordination with a qualified Biologist to minimize impacts to wildlife, review by an Electrical Engineer, and approval by the County prior to the submittal of each building permit.[1467] It would apply to all proposed structures and to all development areas that border natural open space resources, and must include, at a minimum, the elements listed on Draft EIR page 5.13-31.

The requirements of MMs 13-2 and 13-6 are consistent with Los Angeles County's Rural Outdoor Lighting District Ordinance, enacted in 2012.[1468] In developing the ordinance, the County considered community input, reviewed the requirements of other successful jurisdictions, and incorporated relevant parts of the Model Lighting Ordinance created over the course of seven years by the International Dark Sky Association and the Illuminating Engineering Society of North America.[1469] The ordinance was established to permit the reasonable use of outdoor lighting for nighttime safety, utility, security, productivity, and enjoyment while promoting dark skies for the enjoyment and health of humans and wildlife.[1470] The County duly conducted an environmental review of the ordinance under CEQA, concluding that its implementation would not have a significant impact on the environment, but rather would reduce existing impacts because outdoor light was not being consistently regulated in much of the County. Despite the incorporation of these measures, the Project site is currently an undeveloped area with few existing light sources, and it is not possible to fully mitigate the impacts of introducing new sources of nighttime light and glare from the Project. The Draft EIR therefore concludes that the impact would be significant and unavoidable.[1471]

Regarding the last sentence of this comment referring to wildlife impacts due to lighting, this is fully addressed in Section 5.7, Biological Resources, of the EIR. Specifically, Draft EIR page 5.7-141 recognizes that indirect impacts on biological resources as a result of Project implementation may include "increased lighting and glare effects on wildlife species in the remaining and adjacent open space areas…" Implementation of MMs 13-2 and 13-6 from Section 5.13, Visual Resources, which require the Project Applicant to develop a Lighting

1465 *Id.,* p. 5.13-27
1466 *Id.,* pp. 5.13-27 and -28
1467 *Id.,* p. 5.13-31
1468 Los Angeles County Department of Regional Planning (LACDRP). 2017 (accessed October 2). Rural Outdoor Lighting District Ordinance. Los Angeles, CA: LACDRP. http://planning.lacounty.gov/view/rural_outdoor_lighting_district_ordinance/.
1469 Los Angeles County Department of Regional Planning (LACDRP). 2011. Staff Report to the Regional Planning Commission re: Project No. R2011-004-25-(1-5) Case No. RADVT20100006/ENV Case No. T201100135, Amendment to Title 22 (Zoning Ordinance) Regarding Proposed Rural Outdoor Lighting District Ordinance (pp. 3, 8). September 8, 2011. http://planning.lacounty.gov/assets/upl/data/ord_outdoor-lighting-rpc-package.pdf (accessed 10/2/2017).
1470 *Id.,* p. 8
1471 DRP 2017, p. 5.13-29

Plan to reduce potential impacts to biological resources caused by light and glare, would reduce the level of the impact. The Lighting Plan, also referred to as the Dark Sky Plan, shall be consistent with County lighting standards and shall provide guidelines for outdoor lighting that will be used throughout the Project site. Final lighting orientation and design shall be approved by the County of Los Angeles Department of Building and Safety. This measure will reduce the impact of light and glare to a level considered less than significant.[1472]

The analysis of biological resources, including indirect impacts such as nighttime light and glare, is based on intensive investigation of the site, as described beginning on page 5.7-17 under the heading "Methodology to Document Biological Resources" as well as numerous site-specific studies and scientific resource documents; the primary technical references are cited on page 5.7-3 with all references provided in Section 5.7.9, References, of the Draft EIR. The findings of the biological resources analysis are based on expert interpretation of all biological resource data collected for the site and surrounding region. As stated in Section 21082.2(a) of the *Public Resources Code*, the determination of a significant environmental impact shall be based on "substantial evidence in light of the whole record". Section 21082.2(c) states that "Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous…is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." This comment does not provide expert or other factual evidence disputing the findings of Section 5.7 regarding nighttime light and glare impacts to wildlife.

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

Los Angeles County Department of Regional Planning (LACDRP). 2011. Staff Report to the Regional Planning Commission re: Project No. R2011-004-25-(1-5) Case No. RADVT20100006/ENV Case No. T201100135, Amendment to Title 22 (Zoning Ordinance) Regarding Proposed Rural Outdoor Lighting District Ordinance. September 8, 2011. http://planning.lacounty.gov/assets/upl/data/ord_outdoor-lighting-rpc-package.pdf (accessed 10/2/2017).

Response to Comment F.8-60:

The Commenter is correct that with regard to Thresholds 13-1 and 13-4, the Draft EIR concludes that because the Project will unavoidably result in a transition from open space to developed land uses, and will change the topography of the site due to grading and development, it will have significant and unavoidable impacts to the visual character and quality of the site and its surroundings.[1473] PDFs and MMs have been identified to reduce impacts to the extent feasible. Visual character impacts related to grading and development of the Project would be reduced through the implementation of PDFs 13-4 and 13-5, and MMs 7-13, 13-1, 13-2, and 13-3.[1474] However, the change from a rural to urban conditions

[1472] *Id.,* p. 5.7-167
[1473] *Id.,* p. 5.13-14
[1474] *Id.,* p. 5.13-20

and the varying degrees of obstruction of existing views of local foothills and the Tehachapi Mountains would be considered a significant and unavoidable impacts, for which no other feasible mitigation exists.[1475] Further mitigation is infeasible because it would not allow the achievement of the Project Objectives identified in Draft EIR Section 4.0, Project Description, particularly with regard to Objectives 1 (Implement the Antelope Valley Area Plan (AVAP) by creating an environmentally and economically sustainable master-planned community on the Project site to help accommodate planned regional population and economic growth within the West EOA) and 3 (Size the Project to include a broad range of employment, residential, institutional, and recreational land uses to encourage walkability and wellness, while reducing off-site employment-related commuter trips).[1476] The Draft EIR therefore appropriately concludes that Project-related impacts would be significant and unavoidable despite the incorporation of PDFs into the Project and the imposition of feasible mitigation measures.

Response to Comment F.8-61:

With regard to Thresholds 13-1 and 13-4, the mitigation measures that have been identified will reduce impacts, but the Draft EIR concludes that even with all feasible mitigation incorporated, the Project would result in significant and unavoidable impacts to the visual character of the Project site and the surrounding area.[1477] With regard to the efficacy and binding nature of the mitigation that has been identified, it is first noted that Section 21081.6 of the *Public Resources Code* requires a public agency to adopt a program for assessing and ensuring the implementation of required mitigation measures applied to proposed developments, and these specific reporting and/or monitoring requirements shall be adopted coincidental to final approval of the project by the responsible decision maker. Accordingly, the Lead Agency has prepared a Mitigation Monitoring and Reporting Program (MMRP) for the Project, and it is included in the Final EIR as Appendix 2.0-C.Rev, Mitigation Monitoring and Reporting Program. To ensure compliance with the Project mitigation measures, the Applicant will be required to retain the services and incur all associated costs of a qualified environmental/mitigation monitoring consultant who must be approved by the Director of planning, and the applicant must submit annual mitigation monitoring reports to Regional Planning for approval until such reports are no longer required.[1478]

Per PDF 13-1, implemented by MM 7-13 in Draft EIR Section 5.7, Biological Resources, the Applicant is required to develop a Landscaping Plan and plant palette subject to review and approval by the County Biologist.[1479] The palette would be composed of non-invasive species that do not require high irrigation rates, which would minimize the adverse visual impacts of altering the landscape through the use of invasive and non-native species unsuited to the Project site and would avoid the use of unattractive irrigation infrastructure. MM 7-13 uses mandatory "shall" language and will be binding upon the Applicant under the MMRP. With regard to impacts to rock outcroppings visible to the public from SR-138, MM 13-1 requires

1475 *Ibid.*
1476 *Id.,* p. 4-4
1477 *Id.,* pp. 5.13-19 and -20
1478 Final EIR Appendix 2.0-C.Rev, p. C-1
1479 DRP 2017, p. 5.7-190

that during grading and development of the Project, rock outcroppings be preserved to the maximum extent feasible, by requiring the Project plans and specifications to demonstrate the implementation of measures to preserve existing rock outcroppings, subject to the review and approval of the County.[1480] County review and approval will ensure that development standards have been implemented that minimize the visual alteration of the site and to create an aesthetically pleasing environment while still allowing for the achievement of Project Objectives identified in Draft EIR Section 4.0, Project Description. The Project has also been designed to cluster development in the flattest parts of the Project site in order to minimize alterations to site character by preserving areas with dense stands of oak trees, steep slopes, and existing natural drainages.[1481] While this design element has been built into the Project, it is also a binding requirement under MM 13-2 to "Preserve oak woodlands, savannahs, and other sensitive habitat areas near Oso Canyon and at the foot of the San Gabriel Mountains southerly of SR-138.[1482] With regard to potential off-site visual impacts, off-site Project features would be individually small in scale and most would be located underground or at grade, such that impacts would be less than significant.[1483] With regard to the utility lines along SR-138, they would need to be relocated to accommodate the Project. While these are an existing feature and are thus already part of the visual landscape, they are a necessary feature of the Project and could cause visual impacts.[1484] As such, MM 13-3 requires that they are either relocated to the south of the Business Park area or placed underground.[1485] This mitigation measure requires the choice of one option or the other, but the undergrounding cannot be guaranteed as a feasible option, and the impact is therefore conservatively considered significant and unavoidable even with this measure incorporated. The Draft EIR appropriately considers and incorporates all feasible mitigation. Please see the response to Comment F.8-60 with regard to the infeasibility of further mitigation while still meeting Project Objectives.

Response to Comment F.8-61A:

Based on this comment, the following addition has been made to page Draft EIR 5.3-18:

> However, MM 13-1 would require that, during grading and development of the Project, rock outcroppings that are visible from SR-138 would be preserved to the extent feasible.[2]
>
> [2] Section 21061.1 of CEQA defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors".

Because this is a mitigation measure, the Project Applicant/Developer would be required to provide the County with substantial evidence that there are economic, environmental, social, and/or technological factors that make preservation of a rock outcropping visible from

[1480] *Id.,* pp. 5.13-18 and -29
[1481] *Id.,* p. 5.13-9
[1482] *Id.,* p. 5.13-29
[1483] *Id.,* p. 5.13-19
[1484] *Id.,* p. 5.13-20
[1485] *Id.,* p. 5.13-30

SR-138 infeasible if the rock outcropping is not preserved. Therefore, with the above addition to the Draft EIR, which cites the CEQA statute, there is a clear and enforceable performance standard. Please see response to Comment F.8-61 regarding enforcement of the MMs with the MMRP.

Response to Comment F.8-62:

The Commenter is correct that the exact size and location of proposed, new fire stations to serve the Project would be determined by the Los Angeles County Fire Department (LACFD) at the time of Project development. However, the Draft EIR analyzes the provision of up to four new fire stations at a level of detail appropriate for a Specific Plan, and with sufficient specificity to evaluate potential environmental impacts. Per state law, a specific plan may be prepared for the systematic implementation of the general plan, is programmatic in nature, typically deals with major infrastructure, development, and conservation standards, and includes an implementation program.[1486] It must include information about the proposed distribution, location, and extent and intensity of major components of public and private, essential facilities proposed to be located in the area covered by the plan.[1487] Accordingly, the Draft EIR appropriately analyzes the future provision of up to four new fire stations within the Project area, and provides conceptual site locations for three and general size proposals for each station.[1488] In Village 1, one fire station is proposed east of the National Cement Plant Road. The second fire station is proposed in Village 4, and the third fire station is proposed in Village 7, with the location of a potential fourth station to be determined. The stations proposed consist of three medium and one large station.[1489] A medium station would consist of an approximately 10,000-square-foot building on an approximate 1.25-acre lot, and a large station would consist of an approximate 15,500-square-foot building on an approximately 4.00-acre lot.[1490]

The number of proposed on-site fire stations and their general locations were determined through consultation with the LACFD and were based upon the projected increase in population to be served, types of development proposed, geographic distribution of proposed land uses, circulation system, and projected response times to calls from the Project site.[1491] Based on the current, conceptual land use plan for the Project, the new fire station locations would provide 5-minute response times to 90 percent of fire calls from the Project site, which is consistent with the LACFD's stated goal and the Insurance Service Office's Fire Suppression Rating Schedule standard for appropriate fire service.[1492] MM 16-1 requires the Project to meet this standard.[1493] To maintain this goal and ensure that the LACFD can provide optimal service to all future Project residents and employees, the LACFD

[1486] California Government Code §§ 65450, 65453
[1487] *Id.,* § 656451(a)(2)
[1488] DRP 2017, Exhibit 4-1
[1489] *Id.,* pp. 4-76, 5.16-12
[1490] *Ibid.; Id.,* Appendix 4.0-A, Section 3.10.5
[1491] DRP 2017, p. 4-76
[1492] *Ibid*.
[1493] *Id.,* p. 5.16-16

would ultimately approve the final station site locations, and precise locations for all fire stations would be established when future tract maps are processed.[1494]

The Specific Plan's implementation program specifies that future subdivision maps will require discretionary review.[1495] Per the Specific Plan, prior to submission of an application for a Tentative Map, the applicant may submit a "Conceptual Plan," which would be reviewed and commented upon as necessary by the LACFD.[1496] The Applicant would then apply for a Tentative Map, whereupon infrastructure requirements for that subdivision would be set, and would substantially conform to the conceptual plans laid out in Specific Plan Section 3.0, Plan Elements, or otherwise be provided as determined to be appropriate by the Subdivision Committee and either the Hearing Officer or Regional Planning Commission.[1497] Specific Plan Figure 3-30, Conceptual Public Services Plan, depicts the proposed conceptual locations of three of the fire stations, and the plan text discusses the general sizes proposed for each station, as well as the LACFD's ultimate ability to determine the appropriate, final locations to meet response time standards.[1498] This is consistent with the programmatic nature of the Specific Plan, and provides sufficient detail to analyze potential environmental impacts in the project-level EIR.

The Draft EIR also appropriately considers the potential environmental impact of building the new fire stations. The Draft EIR addresses potential environmental impacts of development of the entire Conceptual Land Use Plan, including the proposed new fire stations. The stations were included within the assumed 1,568,160 square feet of proposed Institutional/Civic uses on approximately 110 acres, all contained within the assumed disturbed portion of the Project site.[1499] Development in this assumed disturbed area is evaluated throughout the Draft EIR. Draft EIR Section 5.16 also specifically considers the potential environmental impacts of building the stations with regard to increased fire hazards during construction, the use and handling of hazardous materials, available water supply, and impacts to traffic and circulation.[1500] Finally, as discretionary actions, applications for tentative maps are subject to further environmental review under CEQA.[1501] This would ensure that the impacts specific to the exact size and location of proposed fire stations would be analyzed and reduced to a less than significant level.

Fire flows are considered to be intermittent water uses that are accounted for in a project's water system losses or non-revenue water. As shown in Draft EIR Table 5.18-7, the Project demand includes a potable water system loss of 327 acre-feet per year at buildout, or just under 105 million gallons per year. The volume of fire flows for the Project is discussed on pages 5.3-35 and 5.3-36 of Section 5.3, Hazards and Fire Safety, in the Draft EIR. The Project's water system will provide water supplies to support proposed land uses and provide adequate fire flows and pressure to support any fire-suppression activity in the event of

1494 *Id.,* pp. 4-76, 5.16-16
1495 *Id.,* Appendix 4.0-A, Section 4.5.2.1
1496 *Id.,* Appendix 4.0-A, Section 4.5.3.1
1497 *Id.,* Appendix 4.0-A, Section 4.7.2
1498 Id., Appendix 4.0-A, Section 3.10.5
1499 *Id.,* p 4-6, Table 4-1
1500 *Id.,* pp. 5.16-11 to -15
1501 PRC § 21080(a)

wildland or structural fires. The proposed water system includes water mains, water tanks, pump stations (where necessary), and fire hydrants to ensure sufficient fire flows and water pressure to meet County of Los Angeles Department of Public Works' and the Los Angeles County Fire Department's fire-suppression standards for improved property and development. These requirements must be met prior to the approval of building permits by the County. The fire flow demand for the Project is conservatively assumed to be 4,000 gallons per minute for a duration of 4 hours (approximately 1.0 million gallons) in each of the four water system pressure zones within the site. The system losses shown in Draft EIR Table 5.18-7 are several times greater in magnitude than the required fire flow volumes for the Project. In addition, water reserves to ensure that supplies are available to meet fire suppression demand when needed will be maintained in the onsite water bank and the offsite existing, adjacent water bank that will serve the Project.[1502] The Draft EIR found that the Project's water supplies would sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet, or more than 25.6 billion gallons. This level of reserve water supplies significantly exceeds the maximum fire flow demands for the Project area. Consequently, the Draft EIR accounts for the amount of, access to and impacts associated with potential fire suppression water demand in the analysis of Project water supplies and related infrastructure, including the onsite and offsite water banking facilities.

Response to Comment F.8-63:

The Commenter is correct that, as discussed in the Draft EIR, the Project site is located in an area designated as a Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection (CAL FIRE).[1503] In response to this comment, Exhibit 5.3-2, Fire Hazard Severity Zones, has been added to the Draft EIR. This figure was unintentionally omitted from the Draft EIR. It depicts the portions of the Project site that have been designated Very High Fire Hazard Severity Zones (VHFHSZ), High Fire Hazard Severity Zones (HFHSZ), and Moderate Fire Hazard Severity Zones. The first sentence of the second paragraph under "Environmental Setting" on Draft EIR page 5.3-33 has been revised as follows:

> The western and southeastern edges and eastern p~~P~~ortions of the Project site are designated as a VHFHSZ and the western and central portions are designated as a HFHSV, with the eastern edge designated as Moderate Fire Hazard Severity Zone (see Exhibit 5.3-2, Fire Hazard Severity Zones).

The second sentence of the first paragraph under "On-Site Impacts" on Draft EIR page 5.3-35 has been revised as follows:

> The majority of the Project area is within a VHFHSV and an HFHSV, which are subject to high fire hazards due to the presence of high brush, woodlands, and steep slopes. Areas within the Moderate Fire Hazard Severity Zone include the eastern edge of the Project site and areas farther east.

[1502] DRP 2017, Appendix 5.19-A, p. 8-2
[1503] *Id.,* p. 5.3-30

The Draft EIR adequately analyzes the impact of introducing urban development into an area subject to wildfires, and the Project would comply with regulatory requirements and incorporates mitigation measures that would reduce impacts to a less than significant level. The Draft EIR evaluates the Project's potential fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a VHFHSZ, (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The potential for wildland fire hazards would exist at the wildland/urban interface due to (a) the presence of brush; (b) increased human activity; and (c) the increased potential for fires due to accidental and arson-related causes.[1504] CAL FIRE classifies a zone as having a moderate, high, or very high fire hazard based on a combination of how a fire will behave and the probability of flames and embers threatening buildings. As explained in the Draft EIR, current characteristics of the Project site that contribute to its hazard designation include (1) limited access, (2) lack of existing adequate fire flows, (3) topography, and (4) types of vegetative cover. These characteristics would be addressed as the Project site is developed.[1505] The Draft EIR determines that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under the applicable thresholds of significance. This determination, however, does not rely solely upon implementation of MM 3-9 or other mitigation measures. Rather, the Draft EIR concludes that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protections services, including but not limited to MM 3-9. For further discussion, see Draft EIR Section 5.3, pages 5.3-35 to 5.3-39.

Contrary to the Commenter's assertion, the Draft EIR and Specific Plan,[1506] provide sufficient detail regarding the preparation and approval of a Fuel Modification Plan. The Fire Code contains minimum standards to safeguard the public's safety and welfare, including a requirement for fuel modification plans. Fuel modification plans must be submitted and have preliminary approval prior to any subdivision of land, or have final approval prior to the issuance of a permit for any permanent structure used for habitation, and must be reviewed by the Forestry Division of the LACFD for defensible space, fire safety, and compliance with Section 325.2.1, 325.2.2, 325.10, and 503.2.1 of the Fire Code, LACFD's fuel modification guidelines, and California Code of Regulations, Title 14, Division 1.5, Chapter 7,

1504 *Id.,* pp. 5.2-35 and -36
1505 *Id.,* p. 5.2-35
1506 Final EIR Appendix 4.0-A.Rev

subchapter 2.[1507] The Draft EIR describes the components of the Fuel Modification Plan as follows:

> "A fuel modification plan consists of three sequential zones where combustible native or ornamental vegetation has been modified and/or partially or totally replaced with drought-tolerant, low-fuel-volume plant species. Fuel modification zones are designed to protect homes from wildfire by limiting and reducing the amount of fuel available for a wildfire. The reduction in available fuel affects the flame lengths and amount of heat produced by the fire and eliminates landscape areas where embers can ignite vegetation. Each zone should be designed so that the amount of fuel is reduced and the moisture in the plants is increased the closer to a structure. The details of fuel modification plans vary in complexity and reflect the fire history; the amount and type of vegetation; the arrangement of the fuels; the topography; the local weather patterns; and the construction, design, and placement of structures (LACFD 2015). The following is a generalized fuel modification plan and associated zones (LACFD 2011):
>
> **Zone A** is a minimum 20-foot setback zone from the edge of any structures; it is adjacent to structures and should offer protection from intense flames through either properly maintained, irrigated plants with high moisture content, or through walkways, gravel, stone, paved surfaces, or water features to create breaks in the fire's path.
>
> **Zone B** is the irrigation zone/transition zone that extends from the edge of Zone A up to 100 feet from structures; a large percentage of existing vegetation may be removed and replaced with irrigated, fire- and drought-resistant plants. It may have detached structures and may contain some native vegetation if spaced according to the planting guidelines that create a transition to the native brush and thinning zone (Zone C).
>
> **Zone C** is the native brush thinning zone and, if applicable, extends from the edge of Zone B up to 200 feet from structures. Vegetation will consist mainly of native plants with appropriate thinning and spacing; adequately spaced ornamental shrubs and trees are allowed (if approved by LACFD) but generally not recommended due to water conservation goals. The objective of this zone is to slow the rate of fire spread, reduce flame lengths, and minimize the intensity of the fires prior to reaching irrigated zones (i.e., Zones A and B) or the structure."
>
> (DRP 2017, pp. 5.3-31 and -32)

The characteristics of each zone and the landscaping elements appropriate in and prohibited in each is further described in the Specific Plan. For example, in Zones A and B, irrigation by automatic or manual systems shall be provided, and landscaping shall consist largely of

[1507] DRP 2017, pp. 5.3-30 and -31

green lawns, ground covers and adequately spaced shrubs and trees.[1508] All plants shall be inherently fire resistant and spaced appropriately, most trees are generally not recommended and some species are expressly prohibited within 10 feet of combustible structures, and vines and climbing plants are prohibited on any combustible structure.[1509] In Zone C, irrigation systems are not required, and landscaping and vegetation may consist of existing, native plants, adequately spaced ornamental shrubs and trees, or both.[1510] There may also be replacement landscape planting in Zone C, with ornamental or less flammable native species, to meet minimum slope coverage requirements of County Public Works or Parks and Recreation Landscape or Hillside Design Guidelines.[1511] Existing, native vegetation in Zone C will be controlled by thinning and removal of species constituting a high fire risk, and fuel loads shall be reduced by pruning up the lower 1/3 of remaining trees and shrubs and removing dead wood.[1512] Trees should be limbed up to at least 6 feet above bare earth and a minimum of 3 times the height of underlying plant material, and general spacing for existing, native shrubs is 15 feet between the edge of canopies.[1513]

With regard to the location of fuel modification zones, the Draft EIR indicates that the Fuel Modification Zone for the Project currently extends 200 feet from all structures, and the three fuel modification Zones A-C would comply with the above detailed descriptions.[1514] Preliminary discussions with the LACFD indicate that, due to a variety of variables such as topography and nearby vegetation, it may be appropriate to utilize a fuel-modification buffer that is less than 200 feet, and the extent and location of the fuel zone clearance area, along with conditions under which the setback may be reduced, would be finalized with LACFD review and approval of the Fuel Modification Plan.[1515] Based on conversations between the Applicant and the LACFD, the buffer from structures for the majority of the Project site would be 100 feet because the Project site is predominantly characterized by annual grassland, which is low combustible vegetation.[1516] The 100-foot setback from structures is likely more appropriate for the majority of the property, while in some instances, an alternative compliance of a 150-foot setback from the structure may be appropriate, especially in cases where a number of trees are in the immediate vicinity of lots but are at a grade uphill from the lots.[1517] Figure 3-21 of the Specific Plan depicts landscape zones, including the Transition Zone in which many fuel modification zones are located.[1518] Figure 3-22, Typical Transition Zone, depicts the typical composition of Fuel Modification Plan Zones A-C.[1519] The Specific Plan also describes the relative sizes and extents of each zone where the setback is 200 feet, 150 feet, and/or 100 feet.[1520]

[1508] *Id.,* Appendix 4.0-A, pp. 3-98 and -99
[1509] *Ibid*.
[1510] *Id.,* Appendix 4.0-A, p. 3-99
[1511] *Ibid*.
[1512] *Ibid*.
[1513] *Ibid*.
[1514] *Id.,* p. 5.3-37
[1515] *Ibid*.
[1516] *Ibid*.
[1517] *Ibid*.
[1518] *Id.,* Appendix 4.0-A, p. 3-33; DRP 2017, p. 4-82
[1519] *Id.,* Appendix 4.0-A, p. 3-34
[1520] *Id.,* Appendix 4.0-A, p. 3-99

With regard to plant composition in the fuel modification zones, in accordance with the Landscape Plan for the Project (see MM 7-13 in Section 5.7, Biological Resources), the Fuel Modification Plan (see MM 3-9) will utilize a plant palette that is tailored to the unique environmental conditions of the Project site and that borrows extensively from the existing landscape.[1521] This will allow for both native and adopted species of oaks, willows, cottonwoods, and grasses. The design of this plan would take the Project site's topographical features into consideration. Transitional slopes and some greenways would be enhanced with regionally appropriate species that relate to the historic background of this region such as stone fruits (i.e., peaches, plums, avocadoes) and orchards (i.e., citrus and nuts). Furthermore, species selected for modification would be adapted to the conditions found on the Project site by surviving hot, dry summers without high irrigation demands. A partial species list includes evergreens and deciduous trees that may be modified by the Community Forester in consultation with County staff biologists.[1522] Specific Plan Table 3-8, Plant List, provides the botanical name, common name, water requirements, native status, inherent fire resistance, height, and potential for use in Fuel Modification Plan Zones A-C for all plants being considered as part of the Project plant palette.[1523] There is also a list of prohibited plants.[1524] The final plant palette for fuel modification zones will be approved by the LACFD. The LACFD also provides a pre-approved plant list and plant selection guidelines by zone on its website, which provides further information to the public regarding expected components of the Fuel Modification Plan. While fuel modification plans are ultimately site specific and the required Fuel Modification Plan is subject to further review and approval, as discussed above, the Draft EIR and Specific Plan provide the public with an appropriate amount of information regarding composition of the required plan to evaluate potential environmental impacts.

The impacts of fuel modification zones have been accounted for in the analysis of Project impacts on biological resources in Section 5.7, Biological Resources. MM 7-21 on Draft EIR page 5.7-194 prohibits fuel modification zones from encroaching on the adjacent SEA. MM 7-1 on Draft EIR pages 5.7-171 through 5.7-174 prohibits fuel modification in areas occupied by special status plant species (i.e., crownscale and Mojave spineflower). As such, fuel modification zones would be located away from open spaces where sensitive biological resources are present and would be confined to areas that are proposed for disturbance.

Response to Comment F.8-64:

The Project's fuel modification zone is included within the 7,751-acre development footprint/impact boundary, as depicted on Exhibits 5.7-11a and 5.7-11b. No Project-related fuel modification actions, such as vegetation clearing, will occur outside the development footprint. As stated on page 5.7-172 in Section 5.7.6, Environmental Impacts, "MM 7-22 is included to ensure that fuel modification zones are contained within the current Project impact boundary and would not intrude into the adjacent SEA 17." Regarding invasive species within fuel modification zones, a list of invasive plant species that will be prohibited

[1521] *Id.,* p. 5.3-37
[1522] *Ibid*.
[1523] *Id.,* Appendix 4.0-A, pp. 3-43 to -49
[1524] *Id.,* p. 3-50

from being used in landscaping, and this would include fuel modification zones, is part of the Specific Plan (PDF 7-8).[1525]

Response to Comment F.8-65:

As the Commenter correctly notes, CEQA and the CEQA Guidelines require the EIR to identify feasible MMs and alternatives that can reduce or avoid the Project's potential significant environmental impacts. The Commenter is also correct that CEQA is not required to consider every conceivable alternative to the Project.[1526] Rather, to promote informed decision-making and public participation, the EIR need only analyze a reasonable range of feasible alternatives that meet most of the Project objectives while avoiding or reducing any of the Project's significant environmental effects.[1527] However, the Commenter's claim that the EIR is required to include a "rigorous analysis of reasonable alternatives" must be read in the context of the CEQA Guidelines. Per CEQA Guidelines §15126.6(d), "[t]he EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project," but the significant effects of each alternative shall be discussed "in less detail than the significant effects of the project as proposed."

The County disagrees with this comment's assertion that the Draft EIR fails to analyze a reasonable range of feasible alternatives to the proposed Project. For purposes of CEQA, "feasible" means "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors."[1528] The Lead Agency has the discretion to determine how many Project alternatives constitute a reasonable range.[1529] Moreover, as recognized by the California Supreme Court, "the statutory requirements for consideration of alternatives must be judged against a rule of reason" (internal citations omitted).[1530] "CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in the EIR. Each case must be evaluated on its facts[.]"[1531] Thus, the adequacy of the Draft EIR's alternatives analysis should be considered in light of the Project's potential environmental effects, the nature of the Project, relevant County policies, and other pertinent facts.[1532]

The Draft EIR analyzes four on-site alternatives and one off-site Project alternative, in addition to the statutorily required "No Project" alternative (designated by the Draft EIR as "Alternative A"). All of the alternatives would be consistent with, and are designed to promote the policies of the Antelope Valley Area Plan (AVAP) and its Rural Preservation Strategy, with the exception of Alternative B.

Alternative B, the Previously Proposed Project alternative, is larger than the proposed Project and is based on the original Centennial Project application submitted by the Project

1525 DRP 2017, p. 5.7-140
1526 CEQA Guidelines §15126.6(a)
1527 *Id.,* §15126.6
1528 *Id.,* §15364
1529 *Goleta,* at 553, 566
1530 *Id.,* at 562
1531 *Id*., at 566
1532 *Mira Mar Mobile Community v. City of Oceanside*, at 447, 487

in 2002, prior to the County's adoption of the AVAP. Alternative B covers approximately 11,676 acres and would permit development of 7,847 acres with a maximum of 22,998 dwelling units, approximately 12.2 million square feet (sf) of employment-generating uses, approximately 2 million sf of retail-serving centers, and approximately 943 acres of civic and institutional uses. Alternative B would exceed the approved population, housing, and employment projections included in the AVAP for the area.[1533]

Alternative C, the Additional Drainage Avoidance alternative, would reduce significant biological resource impacts by reducing the Project's development footprint so as to avoid approximately 37 acres that would otherwise be impacted by the Project and preserve it as open space. The primary environmental benefit of Alternative C is that it would reduce impacts to jurisdictional drainages that indirectly function as wildlife movement corridors and serve important ecological functions.[1534] Alternative C would reduce the number of residential units to 19,241, as compared to the Project's proposed 19,333 dwelling units.[1535] Alternative C would also provide 200,000 fewer square feet of commercial uses as compared to the Project.[1536]

Alternative D, the Infrastructure Relocation alternative, would relocate two of the Project's proposed water tanks and its proposed water treatment plant (WTP) to other areas on the Project site. This relocation would reduce the WTP's potential impacts within the Oso Creek drainage, a sensitive habitat, would reduce the Project energy demand and would reduce certain visual and air quality impacts. No change in development capacity would occur under this alternative.[1537]

Alternative E, the Density Clustering/East of Aqueduct alternative, would relocate proposed land use development from the east and west portions of the Project site to the central portion of the site, while maintaining the same number of dwelling units, employment generating uses, and other land uses, in a higher density cluster development pattern.[1538] Alternative E would disturb approximately 656 fewer acres than the proposed Project, and would increase the ratio of acreage of open space and preserved lands to total site acreage by approximately 4 percent compared to the Project.[1539] The reduced impact area would result in a comparable reduction in impacts to various biological resources, including vegetation types, habitat for special status plant and wildlife species, and jurisdictional drainages.[1540]

Finally, Alternative F, the Central Economic Opportunity Area Development alternative, would relocate the Project from the AVAP's West Economic Opportunity Area (EOA) to its Central EOA. This alternative assumes the same types of land uses, amount of development, public facilities, and other amenities as the proposed Project.[1541] As compared to the Project,

1533 DRP 2017, p. 8-16
1534 *Id.,* p. 8-17
1535 *Id.,* p. 8-15
1536 *Ibid*.
1537 *Id.,* p. 8-17
1538 *Id.,* p. 8-18
1539 *Id.,* p. 8-54
1540 *Ibid*.
1541 *Id.,* p. 8-18

this alternative would likely have reduced biological impacts because the off-site location is expected to contain fewer jurisdictional drainages due to flatter terrain with fewer topographical variations, and fewer oak woodland resources.[1542] This alternative is also expected to have a reduced impact on wildlife movement, and a reduced cumulative impact on special status vegetation types, compared to the Project.[1543]

Thus, in accordance with CEQA, the Draft EIR presents a reasonable range of potentially feasible on-site and off-site alternatives to the Project that would reduce and/or avoid some of the Project's potentially significant environmental effects. The selected alternatives promote informed decision making and public participation by providing for consideration a range of alternative land use patterns and siting options that will reduce and/or avoid some of the Project's significant environmental effects and attain most of the Project objectives. Accordingly, the alternatives analysis complies with the requirements of *Public Resources Code* §§ 21002, 21002.1(a).

Response to Comment F.8-66:

As discussed on page 8-3 of the Draft EIR, one of the Project objectives is to "implement the Antelope Valley Area Plan (AVAP) by creating an environmentally and economically sustainable master-planned community on the Project site to help accommodate planned regional population and economic growth within the West EOA." The Lead Agency disagrees with this comment's assertion that this project objective impermissibly restricts the alternatives analysis because it too narrowly frames the goal of the Project as somehow flowing from a need to respond to the existence of the AVAP.

The County has broad legal authority to formulate project objectives. "CEQA does not restrict an agency's direction to identify and pursue a particular project designed to meet a particular set of objectives."[1544] A project objective to implement the AVAP falls well within the County's discretion and in no way violates CEQA. As discussed in response to Comment F.8-65, CEQA only requires that the EIR consider *feasible* alternatives to the proposed Project. *CEQA Guidelines* §15126.6(f)(1) expressly states that "factors that may be taken into account when addressing the feasibility of alternatives" include, but are not limited to, "general plan consistency." Since the AVAP is a component of the County's general plan, and since CEQA expressly allows the EIR to wholly reject as infeasible *any* alternative that it is inconsistent with the AVAP, it necessarily follows that the County has broad authority to identify implementation of the AVAP as a legitimate project objective. Indeed, the general plan is such a fundamental statement of a county's land use policy that CEQA expressly mandates that all EIRs carefully analyze a project's consistency with the general plan.[1545] Moreover, the Environmental Checklist set forth in CEQA Guidelines Appendix G expressly identifies general plan inconsistencies as a potentially significant impact of a project that triggers environmental review. Given CEQA's emphasis on general plan consistency, the notion that

[1542] *Id.,* p. 8-63
[1543] *Ibid*.
[1544] *California Oak Found. v. Regents of Univ. of Cal.* (2010) 188 Cal.App.4th 227, 276
[1545] CEQA Guidelines §15125(d)

this EIR is legally prohibited from including *implementation* of the County's General Plan in its statement of project objectives is misguided and turns CEQA on its head.

In any case, implementation of the AVAP is only one of several Project objectives identified in the Draft EIR. As set forth on Draft EIR page 8-3, the other identified Project objectives are as follows:

1. Design the Project to maximize efficient utilization of regional infrastructure while preserving hundreds of thousands of acres of contiguous natural open space and important biological resources;
2. Size the Project to include a broad range of employment, residential, institutional, and recreational land uses to encourage walkability and wellness, while reducing off-site employment-related commuter trips;
3. Ensure that all Project site infrastructure and public services are funded by the Project to avoid creating any financial obligations on existing residents and other taxpayers; and
4. Integrate a multi-modal transportation network, renewable energy, water conservation, community wellness, and other green development features into the Project's design, build out, and ongoing operations.

Given the breadth and diversity of the many project objectives identified in the Draft EIR, the single Project objective to implement the AVAP in no way artificially narrows the Project purpose such that it impermissibly restricts the EIR's alternatives analysis. After all, CEQA requires that alternatives analyzed in the EIR be capable of attaining most, not all, of the project objectives.[1546] In fact, the Draft EIR analyzes multiple alternatives that would not implement the AVAP as adopted, including Alternative A, the No Project alternative, and Alternative B, the Previously Proposed Project alternative.[1547]

Although the Draft EIR's statement of Project objectives is in full compliance with CEQA, this comment is nevertheless noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.8-67:

This comment incorrectly claims that the Draft EIR "impermissibly rejected" Alternative A, the No Project alternative. In fact, Alternative A was not rejected in the Draft EIR. Rather, Alternative A was carried forward for full analysis in Section 8.0, Alternatives to the Proposed Project, as required by CEQA Guidelines §15126.6(e). Alternative A, along with all other Project alternatives analyzed in Section 8.0, will be considered for approval by the Regional Planning Commission and Board of Supervisors concurrently with their consideration of the proposed Project. The only alternatives that were not carried forward for analysis in Section 8.0, and were thus "rejected" by the Draft EIR, are the Alternative Site

[1546] *Id.,* §15126.6(a)
[1547] DRP 2017, pp. 8-30 and -33

Location Within or Near Tejon Ranch alternative and the Public Input Alternative, as discussed on Draft EIR pages 8-12 and 8-13.

This comment correctly notes that Draft EIR page 8-30 states that Alternative A "is not consistent with the AVAP and the development anticipated on the site for the West EOA." However, this comment's speculation that this Draft EIR determination is "intend[ed] to argue that the existing of the AVAP somehow *mandates* development" is not accurate, as discussed in response to Comment F.8-66. Rather, the cited statement merely reflects the fact that the No Project alternative is not consistent with the intent of the AVAP and its Rural Preservation Strategy. As described in greater detail in response to Comment F.8-20, the AVAP's Rural Preservation Strategy proposes to locate most of the future growth projected for the Antelope Valley within economic opportunity areas (EOAs) designated by the AVAP. Indeed, AVAP Policy LU 1.1 expressly states its intent to "[d]irect the majority of the unincorporated Antelope Valley's future growth to … economic opportunity areas, though appropriate land use designations, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan." As discussed in response to Comment F.8-20, the Project site is located within the AVAP's designated West EOA. Since no development would occur on the Project site under the No Project alternative (Alternative A), it follows that such an alternative would not be consistent with the intent of AVAP Policy LU 1.1 or the plan's Rural Preservation Strategy, which calls for future development to occur on the Project site. Accordingly, the Draft EIR's analysis of Alternative A's land use impacts[1548] accurately concludes that the No Project alternative "would not be consistent with the intent of the AVAP or the West EOA within the Project's development footprint."

Response to Comment F.8-68:

This comment expresses confusion regarding the impetus of the Public Input Alternative and the reasons for its rejection. As explained in Section 4.0, Project Description, on June 17, 2008, Tejon Ranch Company (TRC) entered into a Conservation and Land Use Agreement (Agreement) with Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy). Known as the Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA), the Agreement allows TRC and its development partners to pursue approvals for development of portions of the Tejon Ranch (Ranch) without opposition from the Resource Groups, while providing for the designation of Project open spaces and the dedication or sale of conservation easements over approximately 240,000 acres, or approximately 90 percent, of the 270,000-acre Ranch. The TRCRWA permanently protects an approximately 145,000-acre reserve area through a series of phased dedications of conservation or other open space easements. The TRCRWA also designates three portions of the Ranch for future development, which areas include the Project site, as well as the sites of the Grapevine and Tejon Mountain Village projects previously approved by Kern County.

At the time the TRCRWA was being negotiated, the Conservation Biology Institute and South Coast Wildlands prepared the *Proposed Reserve Design for Tejon Ranch: A Threatened*

[1548] *Id.,* p. 8-28

California Legacy (2006) (Proposed Reserve Design), which proposes a Ranch-wide conservation plan that would serve as an alternative to the conservation plan ultimately agreed to under the TRCRWA. Like the TRCRWA, the Proposed Reserve Design proposes to permanently preserve the vast majority of the Ranch acreage. Also, like the TRCRWA, the Proposed Reserve Design designates three portions of the Ranch for future development, though the footprints and locations of such development areas are not identical to those ultimately agreed to under the TRCRWA. Moreover, the Proposed Reserve Design explains that its proposed Ranch development areas were selected without "consider[ing] whether these areas are appropriate for development from a regional development planning perspective, potential development constraints or the development suitability of portions of these areas, environmental compliance or endangered species implications of development in these areas, other constraints such as military flight corridors, or economic considerations".[1549]

The footprint of the Public Input Alternative, which is depicted on Draft EIR Exhibit 8-3, is identical to the footprint of the of the development area that the Proposed Reserve Design suggests as an alternative to the Centennial Project site, as depicted on Figure 8d of the Proposed Reserve Design. Thus, the Proposed Reserve Design's alternative Centennial project site is the source of the Public Input Alternative considered, but rejected for analysis in the Draft EIR.

The County's reasons for rejecting the so-called Public Input Alternative are set forth on Draft EIR page 8-13. First, this proposed alternative was recommended by the Conservation Biology Institute and South Coast Wildlands in 2006, well before the County's 2015 adoption of the AVAP. Second, this proposed alternative would include the development of approximately 4,990 acres of land located east and northeast of the Project site within 5 separate and noncontiguous areas (much in Kern County) and would not be consistent with the Land Use Policy Map of the AVAP (e.g., the majority of the Public Input Alternative site is located outside of the AVAP-designated West EOA and portions of the alternative site are designated by the AVAP as Open Space Conservation, which does not support urban development). Third, this alternative would reflect an approximate 33 percent decrease in developable acreage and does not provide enough acreage to include both Project-proposed urban land use and Project-proposed on-site natural open space areas. Fourth, this alternative would lead to the unavoidable loss of agricultural land, similar to the Project.

In addition to the reasons for rejecting the Public Input Alternative cited in Section 8.0 of the Draft EIR, the majority of that alternative's proposed development footprint is located in Kern County, as shown on Draft EIR Exhibit 8-3. As such, the Lead Agency has no legal authority to approve the Public Input Alternative, at least with respect to those portions of the alternative located in Kern County. With respect to those portions of the Public Input Alternative footprint that are located within the County, much of the area is designated by the AVAP as Open Space Conservation and is thus precluded from urban development, as discussed above. Since the Public Input Alternative is inconsistent with the AVAP's land use

[1549] Proposed Reserve Design, p. 1

designation and falls outside of the County's regulatory authority, it is infeasible under *CEQA Guidelines* §15126.6(f)(1) and was thus not analyzed in the Draft EIR.

Response to Comment F.8-69:

This comment mischaracterizes the Draft EIR's descriptions of both the Project and Alternative B by ignoring the Draft EIR's distinction between the area of the Project's boundary and the area of the Project's development footprint within that boundary.

As explained on Draft EIR page 8-9, an application for the Centennial project was formally submitted to the County in 2002 and over time the Project applicant changed the Project design in response to concerns expressed by the County, other agencies, and members of the public regarding the potential impacts associated with the conceptual land use plan described in the 2002 application. The Draft EIR's Alternative B, the Previously Proposed Project alternative, is based on the 2002 land use plan and is depicted in Draft EIR Exhibit 8-1.

The proposed Project's land use plan is depicted on Draft EIR Exhibit 4-1 and it reflects the applicant's revisions to the 2002 land use plan. As explained on Draft EIR page 8-9, the Project's land use plan expands the Project site boundary, as compared to the 2002 land use plan, by including additional property on the east side of the Project site. This boundary expansion thus increases the overall acreage of the Project site from 11,676 acres (Alternative B) to 12,323 acres (proposed Project), as shown on Draft EIR Table 8-1.[1550]

However, the proposed Project also reduces the land use plan's overall development footprint (i.e., developed hardscape and graded open space) within the site boundary as compared to the 2002 land use plan (Alternative B), as shown on Draft EIR Table 8-1, revised for clarification below in response to this comment. First, land designated for development of public rights of way (e.g., roads, greenways, internal slopes) is reduced from 627.8 acres (Alternative B) to 327 acres (proposed Project). Second, land designated for development of civic and institutional uses (e.g., schools, golf courses, parks, and utilities) is reduced from 943.3 acres (Alternative B) to 686 acres (proposed Project). Third, land designated for development of non-residential uses (e.g., commercial uses, business parks, employment uses) is reduced from 884.5 acres (Alternative B) to 699 acres (proposed Project). Fourth, open spaces uses are increased from 3,829 acres (Alternative B) to 5,624 acres (proposed Project). As compared to the 2002 land use plan, the proposed Project would increase the amount of land designated for development of residential uses from 3,982.5 acres (Alternative B) to 4,987 acres (proposed Project), but the proposed Project would reduce the number of residential units by 3,665, as compared to Alternative B.[1551] Taken together, the proposed Project would have a total development footprint of 7,207 acres, whereas as Alternative B would have a total development footprint of 7,847 acres, as shown on revised Table 8-1. Thus, the proposed Project would reduce the overall development footprint on the Project site by approximately 640 acres, as compared to Alternative B.

[1550] DRP 2017, p. 8-15
[1551] *Id.,* p. 8-9

In response to this comment, Draft EIR Table 8-1 is hereby revised as follows:

TABLE 8-1
CENTENNIAL SPECIFIC PLAN ALTERNATIVES COMPARISON

	Centennial Project	Alternative A No Project	Alternative B Previously Proposed Project	Alternative C Additional Drainage Avoidance	Alternative D Infrastructure Relocation	Alternative E Density Clustering/East of Aqueduct	Alternative F Central EOA Development
Project Site	12,323 ac	12,323 ac	11,676 ac	12,323 ac	12,323 ac	12,323 ac	12,323 ac (within 23,930-ac EOA)
Open Space	5,624 ac	12,323 ac [a]	3,829 ac	5,661 ac	5,612 ac	6,280 ac	5,624 ac
Residential Area	4,987 ac	0 ac	3,982.5 ac	4,952 ac	4,984 ac	4,519 ac	4,987 ac
Dwelling Units	19,333 du	0 du	22,998 du	19,241 du	19,333 du	19,333 du	19,333 du
Non-Residential Area [a]	699 ac	0 ac	884.5 ac	678 ac	699 ac	650 ac	699 ac
Non-Residential Floor Area (msf)	10.10 msf	0 msf	14.22 msf	9.90 msf	10.10 msf	10.10 msf	10.10 msf
Civic and Institutional Uses [b]	~~684~~685 ac	0 ac	943.3 ac	699 ac	720 ac	632 ac	~~684~~685 ac
Public Rights-of-Way [c]	327 ac	0 ac	~~2,036.7~~ 627.8 ac [c]	327 ac	327 ac	303 ac	327 ac
Developed Land Use	7,207 ac [d]	Existing	7,847 ac	7,170 ac [e]	7,223 ac [f]	6,551 ac [g]	7,207 ac [d]
Open Space: Natural/Unimpacted	5,116 ac	Existing	3,829 ac	5,153 ac	5,100 ac	5,772 ac	5,116 ac

EOA: Economic Opportunity Area; ac: acres; du: dwelling unit; msf: million square feet

[a] includes Commercial, Business Park, and Employment areas
[b] includes Schools, Golf Course, Parks, and Utilities
[c] includes roads, greenways, internal slopes
[d] includes 6,698 acres of developed hardspace and 509 acres of graded open space within the grading footprint
[e] includes 6,656 acres of developed hardspace and 509 acres of graded open space within the grading footprint
[f] includes 6,730 acres of developed hardspace and 496 acres of graded open space within the grading footprint
[g] includes 6,104 acres of developed hardspace and 1,164 acres of graded open space within the grading footprint

Note: Acreage for all categories is conceptual gross acreage and does not include transitional slopes and/or internal slopes. Actual totals may vary with future detailed planning. Total for Project site may not add due to rounding.

Response to Comment F.8-70:

With regards to this comment's claim that the Draft EIR fails to explain why Alternatives C and E were not considered as the "preferred alternatives", CEQA does not require the EIR to

identify a so-called "preferred alternative." However, *CEQA Guidelines* §1512636(e)(2) does require the EIR to identify the "environmentally superior" alternative among the other alternatives. As the Commenter correctly notes, the Draft EIR identifies Alternative E, the Density Clustering/East of Aqueduct alternative, as the "environmentally superior" alternative.[1552]

As explained in the Draft EIR, Alternative E would result in a reduced grading footprint of approximately 656 acres[1553], as compared to the Project and other alternatives. Due to this grading reduction, Alternative E would have significantly reduced impacts related to sensitive habitat, wildlife corridors, water supplies, visual resources, and light and glare, as compared to the Project and other alternatives, though this alternative would not completely avoid any of the Project's significant and unavoidable impacts.[1554] The Commenter also correctly notes that the Draft EIR concluded that Alternative E could attain most of the Project objectives.[1555]

This comment questions the Draft EIR's failure to explain why the Project Applicant proposed the Project instead of the environmentally superior Alternative E. CEQA does not obligate the Project Applicant to propose the most environmentally protective project design that can also attain the project objectives, nor does CEQA require the EIR to explain why the project proponent might prefer the proposed project over the environmentally superior alternative. CEQA only requires that the EIR analyze a reasonable range of feasible alternatives to the proposed project that can also attain most of the project objectives, to briefly compare the environmental effects of each alternative to the proposed project and other alternatives, and to identify the environmentally superior alternative among the alternatives considered in the EIR.[1556] As the Commenter correctly states, it is the Lead Agency's obligation to demonstrate that it has complied with these CEQA requirements and to consider project alternatives and mitigation measures. However, this comment's reliance on *Mountain Lion v. Fish and Game Commission* is misplaced because in that case, the environmental review document at issue completely failed to consider the required "No Project" alternative[1557], whereas this EIR fully analyzes the No Project alternative, as discussed on Draft EIR pages 8-27 through 8-30.

Response to Comment F.8-71:

The primary purpose of the Draft EIR's alternatives analysis is to provide the public and County decision makers with adequate information about a reasonable range of options available to reduce some of the proposed Project's environmental impacts.[1558] As explained in the Draft EIR, Alternative D, the Infrastructure Relocation alternative, would relocate two water tanks and the water treatment plan (WTP) proposed by the Project to other areas of

1552 DRP 2017, p. 8-72
1553 *Ibid*.
1554 *Id.,* pp. 8-19 to -26, -52 to -60, -71 to -72
1555 *Id.,* p. 8-72
1556 CEQA Guidelines §15126.6
1557 16 Cal.4th at 105, 137
1558 *Laurel Heights Improvement Assn's v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376, 403

the Project site.[1559] By relocating the water tanks, Alternative D would eliminate the need to grade the Project's proposed water tank site and avoid the need for hydro-pneumatic pumping systems and lift stations, thereby reducing the Project's grading-driven adverse impacts and reducing the Project's overall energy demand and operational emissions of GHG and criteria pollutants.[1560] Since the Project proposes to locate the WTP within the Oso Creek Drainage, its relocation under Alternative D would eliminate the Project's proposed disturbance of this sensitive riparian habitat.[1561] Alternative D would also reduce the Project's overall impact on visual resources because it would relocate the water tanks behind ridgelines on the Project site.[1562] Thus, Alternative D offers a number of environmental benefits as compared to the Project and is thus appropriately included in the Draft EIR's range of alternatives.

Response to Comment F.8-72:

Contrary to this comment's claim, the Draft EIR does discuss the need for the Project and whether it can be accommodated in existing areas. Indeed, the Draft EIR clearly explains that the Project represents the culmination of a long-term, comprehensive regional and local planning process designed to accommodate projected growth in the Antelope Valley while also protecting the Antelope Valley's valuable open space and agricultural resources. Specifically, the Draft EIR explains that the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* and the County's *Antelope Valley Area Plan* (a component of the General Plan) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria pollutant and greenhouse gas (GHG) emissions and promotes public health.[1563]

As discussed in response to Comment F.8-20, SCAG is required by law to prepare a Regional Housing Needs Assessment (RHNA) based on regional growth projections and the County is in turn required to periodically update its General Plan to accommodate the County's fair share of the regional housing need by identifying sufficient land designated for residential use. SCAG's latest growth forecasts were adopted in 2016 and included forecasts at the regional, county, city, subregional, and TAZ levels.[1564]

SCAG projects that, through 2040, the regional population will grow by 20 percent, resulting in a net increase of approximately 4 million additional residents. The entire North Los Angeles County Subregion, which includes the Antelope Valley and the Project site, will have 245,473 households by 2020 and 331,399 households by 2040, an increase of 85,926 households over 20 years. The unincorporated portion of this subregion is projected to have 69,982 households in 2020 and 116,546 households in 2040. As explained in Draft EIR Section 5.9, Population and Housing, the County's housing element indicates that 30,145 new

1559 DRP 2017, p. 8-17
1560 *Id.,* pp. 8-45, -48, -51
1561 *Id.,* p. 8-47
1562 *Id.,* p. 8-49
1563 *Id.,* pp. 4-3 to -15; 5.8-1 to -11, -19 to -74; 5.9-1 to -21, -23 to -31; 8-4
1564 *Id.,* p. 5.9-4

housing units are needed to meet future housing demand through 2021, a portion of which will be provided by the Project. SCAG's growth projections also included a breakdown at the TAZ level.[1565] The Project site is located in portions of two TAZs and population projections for these TAZs are provided in Draft EIR Table 5.9-5, reprinted below. TAZ 20280000 includes the area north of SR-138 and east of I-5, while TAZ 20281000 includes the area south of SR-138.[1566] As shown in Draft EIR Table 5.9-5, significant population growth is anticipated in TAZ 20280000, which covers the portion of the Project site north of SR-138.

TABLE 5.9-5
POPULATION PROJECTIONS FOR TAZS

	2008[a]	**2012[b]**	**2020[a]**	**2035[a]**	**2040[b]**
TAZ 20280000	372	311	27,575	65,264	50,505
TAZ 20281000	1,041	350	2,079	4,038	1,367
Total	**1,413**	**661**	**29,654**	**69,302**	**51,872**

a – from 2012 SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
b – from 2016 RTP/SCS
Source: [a] SCAG, 2012e, [b] 2015d.

SCAG projects this growth to occur in the North Los Angeles Sub-Region, generally, and in the Project site TAZs, in particular, whether or not the Project is approved. Thus, the Draft EIR explains that the Project is considered growth accommodating rather than growth inducing at a regional level based on SCAG projections.[1567]

Both SCAG and the County have long been engaged in comprehensive, long-term land use and transportation planning to evaluate various development patterns to sustainably accommodate projected growth and regional and sub-regional scale, as discussed in the Draft EIR and in response to Comment F.8-20. At the regional level, SCAG, its member agencies, and regional stakeholders engaged in a public process to prepare the region's first Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) pursuant to SB 375. In order to weigh relative costs and benefits, the 2012 RTP/SCS working group evaluated four regional development patterns that would be capable of achieving the region's CARB-established greenhouse gas (GHG) reduction target while also accommodating future growth projections and housing needs. The land use scenarios under consideration varied with respect to the mix of location (e.g., greenfield development vs. infill development), housing type (e.g., single-family versus multi-family), and transportation investments (e.g., roadway versus transit improvements). These different land use scenarios were developed to explore their relative merits and they informed the project alternatives, evaluated in the environmental impact report, that SCAG prepared for the 2012 RTP/SCS (2012 RTP/SCS EIR).

When it adopted the 2012 RTP/SCS, SCAG ultimately settled on a balanced land use plan that assumes a significant increase in multi-family housing to be constructed in urban infill areas

1565 *Id.,* p. 5.9-10
1566 *Id.,* Exhibit 5.9-1
1567 *Id.,* pp. 1-7; 5.9-3, -31, -33; 8-4

and so-called High Quality Transit Areas (HQTA), but also targets some suburban and rural pockets of the region for additional housing and employment growth, including the Project site, as shown in Draft EIR Table 5.9-5, above. Under the SCAG's balanced land use plan, 68 percent of all new homes in the region would be constructed as multi-family units, and over 50 percent of new housing and employment growth would be located in urban infill areas and HQTAs. The balanced land use plan also provides for approximately 33 percent of all new housing units to be constructed in suburban and rural residential areas of the region.

As discussed in response to Comment F.8-20, SCAG's balanced land use plan provides significant environmental benefits over the "business as usual" land use plan analyzed as the "No Project" alternative in the 2012 RTP/SCS EIR because it would consume less undeveloped land and significantly increases the number of multi-family housing units constructed in urban infill areas. Accordingly, SCAG's balanced land use results in fewer impacts to aesthetic, biological, cultural, mineral, soil erosion, hazardous materials, and water resources, as compared to No Project conditions. The No Project land use plan would also generate 7 percent more VMT than the balanced land use plan, and would thus have significantly greater impacts related to the GHG and criteria pollutant emissions. However, the 2012 RTP/SCS EIR demonstrates that a land use policy focused on infill development risks going too far, as shown by its analysis of the so-called "Envision 2" alternative, which assumes significantly more aggressive infill development patterns than the balanced land use plan. Among other adverse effects, SCAG determined that the Envision 2 land use plan would unreasonably expose lower income populations living in existing infill areas to exacerbated impacts related to gentrification, as well as increased congestion-related impacts (including higher incidents of cancer and other health effects), noise impacts, vibration impacts, infrastructure capacity impacts, among other adverse effects that would be reduced by adoption of a more balanced land use plan that relies on significant, but not overly aggressive, infill development. As discussed in response to Comment F.8-20, SCAG's balanced land use plan was also incorporated in its 2016 RTP/SCS update.

As part of the RTP/SCS process, SCAG encourages its member cities and counties to ensure that their respective general plans consider and reflect RTP/SCS policies and land use strategies as appropriate. The current *Los Angeles County General Plan 2035* was adopted in October 2015 and it serves as the foundational document for community-based plans applicable to 11 unincorporated County planning areas, including the *Antelope Valley Area Plan* (AVAP) adopted in June 2015. The AVAP serves as the community plan applicable to the unincorporated area of the Antelope Valley, which covers a geographic area of 1,800 square miles, or 44 percent of the total County land area.[1568] The AVAP contains regional goals and policies pertaining to land use, housing, community design, circulation, public services and facilities, governmental services, environmental resource management, public safety, and energy conservation, among other topics. The AVAP updates and supersedes the 1986 Antelope Valley Areawide General Plan (AVAGP), the previous community plan applicable to the Antelope Valley planning area.[1569]

[1568] *Id.,* p. 5.8-10
[1569] *Id.,* p. 5.8-3

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[1570] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations, forming the foundation of the AVAP.[1571] This community vision is embodied in the AVAP's "Rural Preservation Strategy." At its core, the AVAP's Rural Preservation Strategy is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment".[1572]

The AVAP's Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development".[1573,1574] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas (EOAs).[1575] Per the AVAP, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[1576] Rural Town Areas serve as transition areas between Rural Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[1577] Rural Preserve Areas are located outside of Rural Town Centers and are largely undeveloped, unserved by existing or planned infrastructure and public facilities, and contain important environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[1578]

The Project site is located entirely within the AVAP's West EOA.[1579] Per the Rural Preservation Strategy, EOAs are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[1580] During the AVAP community planning process, EOAs "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to [EOAs] so that the areas around them can be preserved and maintained at low density, or agricultural uses".[1581]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure".[1582] As stated by the

1570 DRP 2015, p. I-5
1571 *Ibid*.
1572 *Id.,* p. I-6
1573 *Id.,* p. I-7
1574 DRP 2014a, p. 7-7
1575 *Ibid*.
1576 DRP 2015, p. I-7
1577 *Ibid*.
1578 *Ibid*.
1579 DRP 2017, p. 4-4
1580 DRP 2015, p. I-8
1581 *Ibid*.
1582 *Ibid*.

AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in EOAs so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[1583] To ensure that this strategy is implemented, the AVAP specifies that the interpretation of [AVAP] policy should be governed by the AVAP's Rural Preservation Strategy.[1584]

The planning policies and environmental benefits of the Rural Preservation Strategy are closely aligned with the regional land use policies described in the 2012 and 2016 RTP/SCS documents. For example, the AVAP reduces the projected number of new residential housing units in the planning area by 62 percent, locates housing units closer to jobs, and increases the AVAP's jobs/housing ratio from 0.18 to 1.3 at buildout, as compared to the 1986 AVAGP it replaces.[1585] As a result, implementation of the AVAP would generate just 17,065,721 vehicle miles traveled (VMT), a 50 percent reduction below the 33,787,619 VMT generated by the 1986 AVAGP.[1586] Moreover, implementation of the AVAP would convert to urban use only 6,169 acres of undeveloped agricultural land, compared to the 24,433 acres of agricultural land that would be converted under the 1986 AVAGP.[1587] Finally, as compared to the 1986 AVAGP, the AVAP greatly expands the boundaries of Significant Ecological Areas within the planning area and specifically provides for greater protection of wildlife movement corridors.[1588] Thus the AVAP substantially limits the potential for "urban sprawl" development patterns in the Antelope Valley by focusing new development into compact and sustainably designed mixed-use EOA communities that place houses in close proximity to jobs and commercial uses while expanding SEA boundaries and preserving wildlife movement corridors and agricultural land.[1589]

The County developed the AVAP in a manner similar to the process that SCAG undertook when it developed the RTP/SCS balanced land use plan. Specifically, the County environmental impact report prepared for the AVAP (AVAP EIR) evaluated multiple alternative land uses that had the potential of achieving the following project objectives:

- Preserve and enhance each unique town's rural character, allowing for continued growth and development without compromising the rural lifestyle;
- Preserve open space around existing towns in order to preserve hillside areas and significant ridgelines, conserve biological resources, provide opportunities for recreation, and make more efficient use of existing infrastructure in the core areas;
- Plan for integrated circulation systems, including bikeways, walkways, and multi-purpose trails;

1583 *Ibid*.
1584 *Ibid*.
1585 DRP 2014a, p. 7-7
1586 *Id.,* p. 7-8
1587 *Id.,* p. 7-7
1588 *Id.,* p. 7-8
1589 *Ibid*.

- Conserve significant resources, including agricultural lands, mineral resources, water supply, and scenic areas;
- Preserve public health, safety, and welfare through identification of natural and environmental hazards, including noise, seismic, fire, and airborne emissions, and designation of land uses in an appropriate manner to mitigate these impacts; and
- Provide a balance of jobs and housing consistent with AB 32, SB 375, and SCAG's RTP/SCS.

With these objectives in mind, the AVAP EIR analyzed, in addition to the AVAP project, impacts associated with various land use plans that would further reduce development intensity within the planning area as compared to the 1986 AVAGP, specifically the "Reduced Density" and "Alternative Land Use Plan" alternatives. The AVAP EIR also analyzed the impacts associated with continuation of the 1986 AVAGP as the required "No Project" alternative.

The following table compares the buildout projections that would occur under the land use policies assumed for each AVAP project alternative analyzed in the AVAP EIR.

AVAP PROJECT ALTERNATIVES – BUILDOUT PROJECTIONS

	AVAP EIR Proposed Project	**AVAP EIR "No Project" Alternative (AVAGP)**	**AVAP EIR "Reduced Density" Alternative**	**AVAP EIR "Alternative Land Use Plan" Alternative**
Dwelling Units	106,180	278,158	81,784	67,463
Population	405,410	1,070,571	311,834	248,323
Employment	134,351	51,219	103,597	46,225
Jobs/Housing Ratio	1.3	0.18	1.3	0.69
Source: AVAP EIR, Table 7-2				

The AVAP EIR determined that, as compared to the AVAP land use plan, the No Project alternative would have far greater impacts with respect to agricultural and forestry resources, air quality, biological resources, cultural resources, GHG emission, mineral resources, noise, transportation/traffic, and utilities and service systems (water supply).1590 This is largely due to the fact that the AVAP EIR's No Project alternative assumes future buildout of the Antelope Valley in accordance with the 1986 AVAGP, which would accommodate substantially more housing and a far larger population than does the AVAP. The No Project alternative also designates considerably smaller SEA than does the AVAP and thus does not emphasize the conservation of sensitive biological resources and open space areas to the same degree as the AVAP.1591 The AVAP EIR also determined that development of the Antelope Valley in accordance with the 1986 AVAGP would not concentrate future development near regional employment and activity centers, would not

1590 *Id.,* pp. 7-7 to -13
1591 *Id.,* p. 7-8

maintain a health jobs/housing balance, and would thus be inconsistent with SCAG RTP/SCS.[1592]

Since the Reduced Density and Alternative Land Use Plan alternatives would significantly reduce the number of allowable dwelling units, population, and employment growth within the Antelope Valley, the AVAP EIR determined that these alternatives would generally have reduced environmental impacts, as compared to the AVAP.[1593] However, the AVAP also determined that the Reduced Density and Alternative Land Use Plan alternatives would not avoid the AVAP significant and unavoidable impacts, would not accommodate projected growth to the same extent as the AVAP, and that the Alternative Land Use Plan alternative would result in a very low jobs/housing ratio and thus would have greater impacts than the AVAP with respect to population and housing.[1594] Accordingly, the County adopted the AVAP's more balanced land use plan with the primary objective of directing future development within three separate EOAs, while reducing allowable densities elsewhere within the planning area and allowing for the expansion of the existing SEAs.

In adopting the AVAP, the County has established its preferred land use pattern for the overall Antelope Valley. As discussed above, the heart of the AVAP is its Rural Preservation Strategy, which focuses the majority of project growth within three designated EOAs in order to preserve the rural character of the balance of the Antelope Valley. Having determined where future growth is best suited to occur within the Antelope Valley, the Draft EIR describes a set of project objectives for the Centennial project that would ensure implementation of the AVAP's broader planning vision for the West EOA, as follows:

- Implement the Antelope Valley Area Plan (AVAP) by creating an environmentally and economically sustainable master-planned community on the Project site to help accommodate planned regional population and economic growth within the West EOA;
- Design the Project to maximize efficient utilization of regional infrastructure while preserving thousands of acres of contiguous natural open space and important biological resources;
- Size the Project to include a broad range of employment, residential, institutional, and recreational land uses to encourage walkability and wellness, while reducing off-site employment-related commuter trips;
- Ensure that all Project site infrastructure and public services are funded by the Project to avoid creating any financial obligations on existing residents and other taxpayers; and
- Integrate a multi-modal transportation network, renewable energy, water conservation, community wellness, and other green development features into the Project's designs, buildout, and ongoing operations.

[1592] *Id.,* p. 7-13
[1593] *Id.,* pp. 7-13 to -25
[1594] *Id.,* pp. 7-18, -22, -23

As explained in more detail in response to Comment F.8-65, the Draft EIR presents a reasonable range of potentially feasible on-site and off-site alternatives to the Project that would reduce and/or avoid some of the Project's potentially significant environmental effects while achieving most of the project objectives listed above. The selected alternatives promote informed decision making and public participation by providing for consideration a range of alternative land use patterns and siting options that will reduce and/or avoid some of the Project's significant environmental effects and attain most of the Project objectives. Accordingly, the alternatives analysis complies with the requirements of *Public Resources Code* §§ 21002, 21002.1(a).

This comment recommends that the Draft EIR analyze an "alternative that relies more on high-density mixed commercial/residential development projects on existing disturbed lands in order to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and encourage the efficient delivery of services and goods." Setting aside the fact that the Project is already designed to promote the various "smart growth" design principles recommended by CAPCOA and the Office of the Attorney General (as discussed in responses to Comments F.8-20, F.8-83, F.8-101, F.8-202, and F.8-204), the environmental setting of the AVAP planning area does not provide opportunities for high-density mixed use development on previously disturbed areas located outside of designated EOAs in a manner that would also be consistent with the AVAP's planning vision and Rural Preservation Strategy described above.

As explained in the Project Draft EIR and in the AVAP EIR, the AVAP planning area covers 1,800 square miles of predominately rural land that is either undeveloped or occupied by government uses, such as National Forests.[1595,1596] A smaller portion of the AVAP planning is occupied by single-family uses, military facilities, farmland and regional parks, and the remaining 1 percent of the total land area is occupied by multi-family residential, commercial, office, industrial, golf courses, schools and miscellaneous uses.[1597] The only truly urban areas within the boundaries of the AVAP planning area are the incorporated cities of Lancaster and Palmdale, which are outside of the County's land use jurisdiction.[1598] There are a few scattered communities in the AVAP planning area within the County's land use jurisdiction, but these are small rural communities that cannot accommodate projected future growth without significantly comprising their existing rural character.[1599] Given the rural qualities of the AVAP planning area, there are no "existing disturbed lands" that could feasibly accommodate future growth projected for the Project site's TAZs in high-density mixed use commercial/residential development projects, as this comment suggests. Certainly not without seriously compromising the rural character of the AVAP planning area outside of designated EOAs and completely undermining the AVAP project objectives described above.

1595 DRP 2015, pp. 4-8 to -10
1596 DRP 2014a, p. 5.10-4
1597 *Ibid*.
1598 *Ibid*.
1599 *Ibid*.

Indeed, the AVAP planning area's limited ability to accommodate projected growth while maintaining its rural character is precisely the reason why the Draft EIR does not analyze any reduced density alternatives other than Alternative C. As explained in the Draft EIR, such alternatives were rejected for consideration because substantial reductions in the Project's proposed unit count and commercial square footage below levels assumed by Alternative C would result in a development proposal that is not consistent with the goals and policies of the AVAP related to development within the West EOA, or supportive of the Project's objectives.[1600]

As discussed above, to promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to designated EOAs, which were specifically selected due to their proximity to large existing and planned transportation infrastructure projects (i.e., the High Desert Corridor and NW SR-138 Corridor Improvement Project).[1601] Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (*see* AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude designated EOAs, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP (*see* AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7). All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within EOAs so as to preserve the rural character of Antelope Valley outside of the EOAs.

Thus, contrary to the Commenter's claims in this and other related comments, the Draft EIR's decision to reject alternatives that would not support the AVAP's recommended distribution of population density and building intensity within the West EOA is not improper. Rather, it is a reasonable and appropriate criterion when considered in the context of the AVAP's planning vision and Rural Preservation Strategy.

In *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 566 (*Goleta*), the California Supreme Court discussed the importance of long-term comprehensive land use planning in the context of an EIR's alternatives analysis. In that case, the Court explained that land use plans like the AVAP "embody fundamental policy decisions that guide future growth and development" and that, when preparing such plans, "[l]ocal governments must confront, evaluate and resolve competing environmental, social and economic interests".[1602] According to the Court, such comprehensive planning processes "necessarily compels cities and counties to consider *alternate* land-use goals, policies and implementation measures" (emphasis in original).[1603] "The process, moreover, is structured to transcend the provincial. Public participation and hearings are required at every stage, in order to obtain an array of viewpoints."[1604] Because of this, the Court held, a project-level EIR, such as the Draft EIR in

[1600] DRP 2017, pp. 8-10, -69
[1601] DRP 2015, p. I-8
[1602] *Goleta,* at 571
[1603] *Ibid*.
[1604] *Ibid*.

this case, "is not ordinarily an occasion for the reconsideration or overhaul of fundamental land use policy."[1605]

As discussed above, the AVAP is the product of 23 public meetings conducted over the course of eight years to "develop a shared vision for the future, identify community issues, draft proposals for the future, and prioritize their recommendations, forming the foundation of the Area Plan".[1606] In addition, County planners "partnered with other County departments to explore the recommendations, refine the proposed goals and policies, plan for program implementation, and gather support to ensure success".[1607] Indeed, development of the AVAP was "an iterative process, and in this case, the communities were included in the earliest steps of development and subsequent rounds of review".[1608]

Not only were alternative land use visions for the AVAP planning area debated and refined by the public and County over the course of the AVAP's eight-year planning process, they were also subject to environmental review in accordance with CEQA. As discussed above, the AVAP EIR analyzed a Reduced Intensity Alternative that would have reduced the number of dwelling units, population, and employment permitted under the AVAP by 23 percent.[1609] The AVAP EIR also analyzed an Alternative Land Use Policy Map alternative that would have reduced the number of dwelling units permitted under the AVAP by 36 percent, the population by 39 percent and employment by 66 percent.[1610] Thus, the public and County decision makers have had ample opportunity to review and comment on the proposed use of the Project site with a building density and intensity comparable to the proposed Project, as well as alternative development visions for the site. The fact that the applicant has proposed a Project that is consistent with the AVAP's Rural Preservation Policy should not prompt reconsideration of the AVAP's planning policies in the Draft EIR.

In the words of the *Goleta* court:

> Informed and enlightened regional planning [does] not demand a project EIR dedicated to defining optimal alternative[s] … without regard to feasibility. Indeed, such ad hoc reconsideration of basic planning policy [is] not only unnecessary, but would [be] in contravention of the legislative goal of long-term comprehensive planning. … [T]he keystone of regional planning is consistency – between the general plan, its internal elements, subordinate ordinances, and all derivative land use decisions. Case-by-case reconsideration of regional land-use policies, in the context of a project-specific EIR, is the very antithesis of that goal. … [A]n EIR is not ordinarily an occasion for the reconsideration or overhaul of fundamental land use policy.
>
> (*Goleta,* at 572-573)

1605 *Id.,* at 573
1606 DRP 2015, p. I-5
1607 *Ibid*.
1608 *Ibid*.
1609 DRP 2014a, p. 7-6
1610 *Ibid*.

Therefore, it is appropriate for the Draft EIR to reject Project alternatives that would require substantial reductions in the Project's proposed unit count and/or commercial square footage below levels assumed by Alternative C because such alternatives would result in a development proposal that is not consistent with the goals and policies of the AVAP and its Rural Preservation Strategy.

Response to Comment F.8-73:

The County disagrees with this comment's assertion that the Draft EIR should have considered a wider range of alternatives to the proposed Project. The Lead Agency has the discretion to determine how many Project alternatives constitute a reasonable range.[1611] Moreover, as recognized by the California Supreme Court, "the statutory requirements for consideration of alternatives must be judged against a rule of reason" (internal citations omitted).[1612] "CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in the EIR. Each case must be evaluated on its facts[.]"[1613] Thus, the adequacy of the Draft EIR's alternatives analysis should be considered in light of the Project's potential environmental effects, the nature of the Project, relevant County policies, and other pertinent facts.[1614] Please see responses to Comments F.8-65, F.8-66, and F.8-74 for a discussion regarding the adequacy of the Project alternatives analyzed in the Draft EIR. This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.8-74:

The County disagrees with this comment's assertion that the Draft EIR should have considered a wider range of alternatives to the proposed Project. The Lead Agency has the discretion to determine how many Project alternatives constitute a reasonable range.[1615] Moreover, as recognized by the California Supreme Court, "the statutory requirements for consideration of alternatives must be judged against a rule of reason" (internal citations omitted).[1616] "CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in the EIR. Each case must be evaluated on its facts[.]"[1617] Thus, the adequacy of the Draft EIR's alternatives analysis should be considered in light of the Project's potential environmental effects, the nature of the Project, relevant County policies, and other pertinent facts.[1618] Please see responses to Comments F.8-65 and F.8-66 for a discussion regarding the adequacy of the Project alternatives analyzed in the Draft EIR. This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

1611 *Goleta,* at 553, 566
1612 *Id.,* at 562
1613 *Id*., at 566
1614 *Mira Mar Mobile Community v. City of Oceanside*, at 447, 487
1615 *Goleta,* at 553, 566
1616 *Id.,* at 562
1617 *Id*., at 566
1618 *Mira Mar Mobile Community v. City of Oceanside*, at 447, 487

Response to Comment F.8-75:

Contrary to this comment's claim, the Draft EIR does not assert that the Project is "required" by the AVAP or that its approval is mandatory. Indeed, Section 4.8.1 of the Project Description clearly explains that the Project's proposed specific plan, zoning ordinance amendment, General Plan amendment, vesting tentative map, development agreement and conditional use permits are all *discretionary* approvals that would be *considered* for adoption by the Lead Agency. This comment's assertions that the proposed Project approvals are subject to CEQA review, and that the Project must comply with the state and federal Endangered Species Acts, are correct. This comment also accurately states that the Project would require adoption of a specific plan and approval of an AVAP Highway Plan amendment, as discussed in Section 4.8.1. However, this comment's assertion that the Draft EIR is misleading because it purportedly claims that the Project is "required" by the AVAP is not supported by the facts and is itself misleading. The Draft EIR makes no such claim.

Response to Comment F.8-76:

The County disagrees with this comment's assertion that the Draft EIR should have considered a wider range of alternatives to the proposed Project, as well as this comment's assertion that the Draft EIR does not provide any evidence indicating that a smaller version of the Project is not feasible. The Lead Agency has the discretion to determine how many Project alternatives constitute a reasonable range.[1619] Moreover, as recognized by the California Supreme Court, "the statutory requirements for consideration of alternatives must be judged against a rule of reason" (internal citations omitted).[1620] "CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in the EIR. Each case must be evaluated on its facts[.]"[1621] Thus, the adequacy of the Draft EIR's alternatives analysis should be considered in light of the Project's potential environmental effects, the nature of the Project, relevant County policies, and other pertinent facts.[1622] Please see responses to Comments F.8-65, F.8-66, and F.8-74 for a discussion regarding the adequacy of the Project alternatives analyzed in the Draft EIR. This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.8-77:

The County disagrees with this comment's assertion that the Draft EIR should have considered a wider range of alternatives to the proposed Project, and the assertion that the Draft EIR sets up a false "all or nothing" decision for County decision makers. The Lead Agency has the discretion to determine how many Project alternatives constitute a reasonable range.[1623] Moreover, as recognized by the California Supreme Court, "the statutory requirements for consideration of alternatives must be judged against a rule of

[1619] *Goleta,* at 553, 566
[1620] *Id.,* at 562
[1621] *Id.,* at 566
[1622] *Mira Mar Mobile Community v. City of Oceanside*, at 447, 487
[1623] *Goleta,* at 553, 566

reason" (internal citations omitted).[1624] "CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in the EIR. Each case must be evaluated on its facts[.]"[1625] Thus, the adequacy of the EIR's alternatives analysis should be considered in light of the Project's potential environmental effects, the nature of the Project, relevant County policies, and other pertinent facts.[1626] Please see responses to Comments F.8-65, F.8-66, and F.8-74 for a discussion regarding the adequacy of the Project alternatives analyzed in the Draft EIR. This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.8-78:

The County disagrees with this comment's assertion that the Draft EIR should have considered a wider range of alternatives to the proposed Project, as well as this comment's assertion that the Draft EIR does not provide any evidence indicating that a smaller version of the Project is not feasible. The Lead Agency has the discretion to determine how many Project alternatives constitute a reasonable range.[1627] Moreover, as recognized by the California Supreme Court, "the statutory requirements for consideration of alternatives must be judged against a rule of reason" (internal citations omitted).[1628] "CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in the EIR. Each case must be evaluated on its facts[.]"[1629] Thus, the adequacy of the Draft EIR's alternatives analysis should be considered in light of the Project's potential environmental effects, the nature of the Project, relevant County policies, other pertinent facts.[1630] Please see responses to Comments F.8-65, F.8-66, and F.8-74 for a discussion regarding the adequacy of the Project alternatives analyzed in the Draft EIR. Finally, it should be noted that the Draft EIR does not assert that a significantly reduced density alternative would be economically infeasible, but rather that such an alternative is infeasible when considered in light of the nature of the Project and relevant County policies, such as the RTP/SCS and the AVAP.[1631]

Response to Comment F.8-79:

This comment's statement that climate change and the finite nature of fossil fuel energy sources require the increased development of renewable sources of energy is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The Project has been specifically designed to significantly reduce its reliance on fossil fuel and to promote energy efficiency and the use of renewable energy sources, as discussed in response to Comment F.8-204. Specifically, regarding renewable energy production, MM 21-1 requires the Project Applicant/Developer to provide the County with

1624 *Id*., at 562
1625 *Id*., at 566
1626 *Mira Mar Mobile Community v. City of Oceanside*, at 447, 487
1627 *Goleta,* at 553, 566
1628 *Id.,* at 562
1629 *Id*., at 566
1630 *Mira Mar Mobile Community v. City of Oceanside*, at 447, 487
1631 DRP 2017, pp. 8-9 to -11

plans and specifications that demonstrate 50 percent of the Project's anticipated electrical energy demand at buildout shall be satisfied from on-site renewable energy generation.

Energy providers associated with the Project will be required to comply with Renewable Portfolio Standards set by SB X1-2 and 350. SB X1-2 requires IOUs, POUs, and ESPs to increase purchases of renewable energy such that at least 33 percent of retail sales are procured from renewable energy resources by December 31, 2020. In the interim each entity was required to procure an average of 20 percent of renewable energy for the period of January 1, 2011 through December 31, 2013; and will be required to procure an average of 25 percent by December 31, 2016, and 33 percent by 2020. Senate Bill 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030.

In addition, MM 21-5 requires the Project to equip a minimum of 70 percent of public and community pools and spas with active solar water hearing systems where heating is necessary or desired, and MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature. MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. Similarly, MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent. Also, the Specific Plan's Green Development Program requires the installation of onsite solar panel systems on roof areas for a minimum of 30 percent of all single-family detached and attached residential units; a minimum of 30 percent of all multi-family residential units, and a minimum of 60 percent of buildings located within Business Park land use designations.

This comment cites several articles and studies (i.e., Cameron 2010; Subramanian 2012; Lovich 2011; Walston 2016) that support this comment's claim that the development of utility-scale renewable energy facilities has the potential to adversely affect local species and their habitats, including avian species. However, the Project does not propose construction of a utility-scale renewable energy facility. Indeed, Policy COS 13.9 of the Antelope Valley Area Plan expressly prohibits ground-mounted utility-scale renewable energy production facilities within the West EOA, where the Project site is located. This comment also cites articles and studies (i.e., McDonald 2009; Elkind 2009) that support this comment's claim that reliance of distributed solar energy collection systems is one way to promote renewable energy production while reducing or avoid some of the biological impacts associated with utility-scale renewable energy facilities. As discussed above, the Project would install roof-mounted distributed solar energy collection systems, and not construct utility-scale renewable energy facilities, to satisfy its renewable energy production obligations under MM 21-1, and is thus consistent with this comment.

Response to Comment F.8-80:

This comment correctly explains that the generation and consumption of electricity is a source of adverse environmental impacts, as disclosed in the Draft EIR. As discussed on Draft EIR page 5.11-8, for example, the combustion of fossil fuels for the generation of electric power is the primary contributor of sulfur dioxide (SO_2) emissions, which at peak levels can cause breathing difficulty, respiratory illness and aggravate existing heart disease. The Draft EIR also discloses that the generation of electricity is a significant source of greenhouse gas (GHG) emissions.[1632]

The County agrees with this comment's concern for the need to reduce energy consumption and the need for California to increase the availability of renewable sources of electric power and to reduce our reliance on fossil fuel generated electricity. Accordingly, the Project includes a Green Development Program, which is intended to meet or exceed state, regional, and local requirements for energy efficiency and green building ordinances.[1633] Sustainable and resiliency features will be incorporated in the design from the earliest stages through the final buildout.[1634] The Green Development Program will be adopted by resolution and incorporates the County's Green Building Ordinances with respect to development for the Project Site.[1635] Moreover, per the Green Development Program, MMs 21-1 and 21-3, prior to any tentative tract map approval, the project proponent is required to provide the County with an Energy Plan documenting compliance with applicable energy conservation requirements of applicable Title 24 standards in the California Code of Regulations, including verification that the project will *exceed* the energy conservation requirements of 2016 Title 24 standards by 15 percent for residential developments and 10 percent for nonresidential developments. The Energy Plan must also confirm that a menu of energy efficiency design elements, along with other design considerations and options, has been made available by the project proponent to builders, developers, and property owners as part of the internal design review process. In addition, each developer, builder, or property owner will be required to incorporate the design elements required to comply with 2016 Title 24 requirements, and select from the menu or implement other available technologies as may be needed to reduce energy consumption by 15 percent below 2016 Title 24 requirements for residential developments and 10 percent for nonresidential developments. All provisions outlined in the approved Energy Plan shall be either conditions of approval for any commercial/industrial site plan or included as notes on all final subdivision maps.

This comment's observation that electricity generation accounts for approximately 20 percent of California's total GHG emissions inventory is generally consistent with the determination of the California Air Resources Board's 2017 California GHG Emission Inventory, which reports that electric power generation accounts for 19 percent of the state's total GHG emissions.[1636] This comment also accurately cites the California Energy

[1632] *Id.*, p. 5.21-56
[1633] *Id.,* Appendix 4.0-A, p. M-6
[1634] *Ibid*.
[1635] *Id.,* p. 2-60
[1636] California Air Resources Board (CARB). 2017. 2017 Edition California GHG Emission Inventory: California Greenhouse Gas Emissions for 2000 to 2015 – Trends of Emissions and Other Indicators. Sacramento, CA: CARB. https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2015/ghg_inventory_trends_00-15.pdf.

Commission's August 2011 Preliminary California Energy Demand Forecast to support the proposition that, without implementation of energy efficiency, the State's peak electricity demand is projected to grow by 1.14 percent between 2010 and 2020, assuming relatively high economic and demographic growth. The same CEC forecast projects that the State's peak electricity demand will grow by just 0.91 between 2010 and 2020 with more stringent energy efficiency requirements, as this comment notes, but this CEC projection assumes lower economic and demographic growth and high electricity rates, as compared to CEC's 1.4 percent "high energy demand" projection.

This comment cites a 2015 report by Matthew Heberger and Kristina Donnelly, titled *Oil, Food, and Water: Challenges and Opportunities for California*, to support the proposition that electricity generated from fossil fuels contributed to air pollution from carbon dioxide and fine particulate matter, and water pollution from direct spills or impacts to groundwater from drilling, mining, and injection activities. While the County does not dispute the fact that fossil-fuel-fired electricity generation contributes to adverse impacts to air and water resources (which impacts are disclosed and analyzed in Draft EIR Sections 5.4, Water Quality, 5.11, Air Resources, and 5.21, Climate Change), the cited report does not directly support the Commenter's claim, as the report is focused on the statewide adverse impacts of oil production on the agriculture industry, rather than the adverse impacts of fossil-fuel-fired electricity generation. Nevertheless, this comment is consistent with the Draft EIR's disclosure that fossil-fuel-fired electricity generation contributes to adverse impacts to air and water resources.

The Commenter's observation that electricity generation is water intensive is generally supported by the cited 2007 Larson report, which determined that some forms of electrical generation are highly water dependent, such as bioenergy (which requires water for crop production), hydropower, and coal fired one-through cooling power plants. This comment's observation that water and energy utilities should work together to develop more efficient systems that would benefit both resources is noted for the record and is generally supported by the cited 2016 Tarroja report.

The Project has been designed to be highly water efficient. For example, per the Centennial Green Development Program, the Project will implement the Residential Mandatory Measures and Nonresidential Mandatory Measures for water efficiency and conservation set forth in Divisions 4.3 and 5.3 of the CALGreen Code or the County CALGreen Code, whichever are more stringent, and including applicable emergency regulations and subsequent amendments.[1637] The Project will also install, maintain and monitor all non-construction potable and non-potable water use using appropriate metering equipment, such as smart meter or dual meter, throughout the site, and will install, maintain, and operate onsite wastewater treatment and conveyance facilities that provide recycled water treated to California Title 22 unrestricted reuse standards from onsite wastewater.[1638] The Project also requires the preparation and submittal to the Los Angeles County Department of Regional Planning of a water use report to verify that applicable indoor and outdoor water use performance standards are being achieved and that available supplies will be sufficient to

[1637] DRP 2017, Appendix 2.0-A to Appendix 4.0-A, p. 22
[1638] *Ibid*.

meet future demand. Response measures may include, without limitation, tiered water service rate enhancements, surcharges, additional enforcement, water system repairs or upgrades and securing supplemental water from sources such as inter-basin groundwater transfers or new imported water supplies. The Project will provide real-time water consumption data to residents and businesses from service provider to monitor usage.[1639] The Project is also subject to many other mitigation measures and design requirements to ensure its efficient use water during construction and operation, as discussed in response to Comment F.8-204.

This comment's observation that the development of electricity generation facilities and transmission lines may impact wildlife is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. In support of this observation, the Commenter cites a 2012 article by the Nature Conservancy's D. Richard Cameron concerning the potential environmental effects associated with constructing and operating utility-scale renewable energy projects in the Mojave Desert and which recommends various policies for reducing such impacts on higher conservation value areas, thus reducing the trade-offs between converting to a green energy economy and conserving biodiversity. The Project does not propose development of a utility-scale renewable energy project in the Mojave Desert. However, as discussed is more detail in response to Comment F.8-95, the Project's Green Development Program does require the installation of rooftop mounted distributed solar generation equipment at various levels throughout the Project site and therefore promotes the recommendation of the cited 2016 Trainor report to increase the overall number distributed renewable energy systems in order to reduce land use impacts associated with centralized utility-scale energy facilities.

In response to this comment, the following document is added to the administrative record:

California Air Resources Board (CARB). 2017. 2017 Edition California GHG Emission Inventory: California Greenhouse Gas Emissions for 2000 to 2015 – Trends of Emissions and Other Indicators. Sacramento, CA: CARB. https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2015/ghg_inventory_trends_00-15.pdf.

Response to Comment F.8-81:

This comment's observation regarding the benefits of energy efficiency measures is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. As discussed in responses to Comments F.8-80 and F.8-204, the Project has been designed to be highly energy efficient and, in fact, will be required to significantly exceed all California energy efficiency standards applicable to residential and nonresidential buildings.

This comment cites a 2009 energy efficiency study by Nicole Hopper et al. that generally supports the Commenter's claim that energy efficiency measures reduce energy consumption and thus has beneficial impacts. This comment also cites a 2009 article by

1639 *Ibid*.

Robert McDonald *et al*. that generally supports the Commenter's claim that shifting from non-renewable fossil fuels to renewable energy sources will reduce GHG emissions, air, water and pollution impacts to biological resources, provided renewable energy facilities are properly sited. This comment also relies on articles by Bill Powers (2009) and Ethan Elkind (2009) that generally support the Commenter's claim that distributed solar is a good example of appropriately sited renewable energy facilities. As discussed in responses to Comments F.8-80 and F.8-204, the Project has been designed to be highly energy efficient and will promote the use of distributed renewable energy systems located on rooftops, within building footprints. The Project does not, however, propose development of a utility-scale renewable energy facility of the type studied in the Robert McDonald article.

The Commenter cites a 2013 publication of the Los Angeles Department of City Planning that generally supports this comment's claim that legislation is needed to promote the appropriate siting and use of renewable energy, such as CALGreen and its requirement that new construction incorporate solar-ready roofs and solar-ready pre-wiring. As discussed in response to Comment F.8-80, the Centennial Specific Plan's Green Development Program, MMs 21-1 and 21-3, require that, prior to any tentative tract map approval, the Project proponent must provide the County with an Energy Plan documenting compliance with applicable energy conservation requirements of applicable Title 24 standards in the California Code of Regulations, including meeting solar-ready roof and wiring requirements, and verification that the Project will *exceed* the energy conservation requirements of 2016 Title 24 standards by 15 percent for residential developments and 10 percent for nonresidential developments.

As this comment correctly notes, it has been California policy that all new residential buildings will be zero net energy (ZNE) by 2020 and new commercial buildings will be ZNE by 2030, as described in the 2008 California Public Utilities Commission (CPUC) long-term energy efficiency strategic plan. In 2013, the California Energy Commission (CEC), in coordination with the CPUC, commenced a process to update the California Building Energy Efficiency Standards (Title 24) and, in 2016, the CEC updated the Title 24 Building Energy Efficiency Standards to establish building design and construction requirements that move closer to achieving California's ZNE goals, with the next update scheduled for 2019. As part of 2019 Building Energy Efficiency Standards rulemaking process, CEC staff has currently determined that ZNE cannot be achieved by 2020 within the confines of existing net energy metering and life cycle costing rules.[1640, 1641] CEC staff has also determined that the State's ZNE goals cannot be achieved until California develops and implements electric grid harmonization strategies that maximize self-utilization of photovoltaic array output and minimize renewable energy exports back to the grid, such as commercially viable battery

[1640] California Energy Commission, 2019 Building Energy Efficiency Standards PreRulemaking Presentation - Proposed 2019 Building Energy Efficiency Standards ZNE Strategy (Aug. 24, 2017), http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-01/TN220876_20170824T105443_82217_ZNE_Strategy_Presentation.pdf.

[1641] Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

storage, demand response, thermal storage technologies.[1642,1643] California has, however, continued to make substantial progress toward achieving its ZNE policy, including most recently the CEC's decision to require solar panels on rooftops of most types of new residential buildings.[1644] These and additional future building code standards updates, which must also take into account all applicable statutory building code standards mandates, such as consumer cost effectiveness, are expected to continue the State's trajectory toward achieving its ZNE policy.

However, commercial and residential energy efficiency standards have been made more stringent since 2005. For example, Title 24 standards sets minimum energy-saving requirements for new buildings and renovations that will reduce energy used for lighting, heating, cooling, ventilation, and water heating; the newest standards under Title 24 went into effect on January 1, 2017.[1645] As discussed above, the Project is required to comply with and exceed the Title 24 Building Energy Efficiency Standards, including those obligating new construction to be ZNE when such regulations are adopted as planned.

Response to Comment F.8-82:

Assuming that this comment is intended to be taken literally, its claim that the Draft EIR underestimates the Project's GHG emissions "by relying upon the unrealistic assumption that most residents will find onsite employment" is clearly not supported by the facts. The Draft EIR expressly discloses that the total number of Project residents will be far larger than the number of on-site jobs. As explained in the Draft EIR, the Project is expected to generate 57,150 residents but would only provide 23,675 on-site jobs.[1646] Thus, the statement that "most residents will find onsite employment" is not supported by the information in the Draft EIR.

Assuming that this comment is intended to refer only to Project residents *in the workforce*, however, the Draft EIR never claims or assumes that such residents will work at jobs located on the Project site. On page 5.10-49, the Draft EIR explains that, under the Project's land use plan, which balances the number of on-site jobs with on-site housing uses, all on-site jobs could theoretically be filled by Project workers, but it also explains a portion of the Project workforce "can be expected to live or work outside of the Project site area." Moreover, the Draft EIR never speculates as to the number of Project residents that will actually work at on-site jobs. Rather, the Draft EIR relies on the North County Sub-Area Traffic Model to estimate the volume of external and internal trips within the Project area based on parameters such as population and employment and the relative distances between areas

1642 *Ibid*.

1643 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

1644 California Energy Commission Initial Statement of Reasons for Proposed Building Standards of the California Energy Commission Regarding Code of Regulations, Title 24, Part 1, Chapter 10 and Part 6 (2010 California Energy Code) Docket Number 17-BSTD-02

1645 CCR, Title 24

1646 DRP 2017, pp. 5.9-24 and -29

for which trips will be made, the same traffic model used in the AVAP EIR.[1647,1648] As shown on Draft EIR Table 5.10-19, the North County Sub-Area Traffic Model determined that 52 percent of the Project's average daily total trips would occur external to the Project site. The Draft EIR also explains that most of the Project's internal trips would occur between home and non-work activities, such as shopping and recreation.[1649] The Lead Agency is entitled to rely on expert traffic model estimates as substantial evidence of a project's likely traffic impacts, including the air emissions associated with such traffic trips.[1650,1651] This comment does not question the accuracy of the North County Sub-Area Traffic Model, nor does it provide evidence that the model is unreliable.

The Lead Agency disagrees with this comment's assertion that the Draft EIR's GHG analysis is deficient for failing to consider "the GHG emissions if the Project is not built in the order proposed." To the contrary, the Draft EIR's analysis of Project impacts related to GHG emissions does take into account Project construction phasing. As explained on Draft EIR page 5.21-50 and Draft EIR Appendix 5.11-A, the Project's construction-related GHG emissions are largely attributable to fuel use from construction equipment and were calculated by using the California Emissions Estimator Model (CalEEMod) Version 2016.3.1 using the construction inputs described in Section 5.11, Air Resources. Use of this GHG emission estimation tool is appropriate and is supported by substantial evidence ("CalEEMod is a 'state-of-the-practice' land use emissions calculator tool … used by municipal lead agencies to evaluate the GHG emissions pursuant to [CEQA]"[1652]). The major construction phases assumed by this analysis included demolition, site preparation, grading, building construction, architectural coating and paving.[1653] As explained in the Draft EIR, these phases were assumed to occur in connection with anticipated construction at the Project and related off-site Project impact areas as described in Section 4.0, Project Description.[1654] Specific inputs to CalEEMod included but were not limited to the start and finish dates of construction phases; inventories of construction equipment to be used during each phase; areas to be paved; and areas to be painted.[1655] Output emissions data were provided for off-road equipment and on-road vehicles.[1656]

The Draft EIR's GHG analysis further assumed that, once construction begins (in Year 1), it will proceed continuously for approximately 20 years, with full buildout completed after 20 years.[1657] The Draft EIR assumed that Project grading would occur from Year 1 through Year 18 and, for a conservative estimate, it was assumed that grading would be limited by weather

1647 *Id.*, p. 5.10-49
1648 DRP 2014, p. 5.16-25
1649 DRP 2017, p. 5.10-51
1650 *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal* (1988) 47 Cal. 3d 376, 410
1651 *National Parks & Conserv. Ass'n v. County of Riverside* (1999) 71 Cal. App. 4th 1341, 1362
1652 California Air Resources Board (CARB). 2015. Greenhouse Gas Quantification Methodology for the Strategic Growth Council Sustainable Agricultural Land Conservation Program Agricultural Conservation Easements Greenhouse Gas Reduction Fund Fiscal Year 2014-2015 (p. 1). Sacramento, CA: CARB. https://www.arb.ca.gov/cc/capandtrade/auctionproceeds/sgcsalcpqm.pdf.
1653 DRP 2017, p. 5.21-50
1654 *Ibid.*
1655 *Id.,* p. 5.21-50
1656 *Ibid*.
1657 *Ibid*.

and other factors to 200 days per year.[1658] Project construction was assumed to begin in 2016, with a buildout complete in 2035, although the actual start of construction and buildout are likely to occur later than 2016 and 2035, respectively.[1659] The 2035 buildout date is consistent with the Project traffic impact analysis (see Section 5.10, Traffic Access and Circulation) and also with the CalEEMod model, which does not include on-road emissions factors beyond 2035.[1660] This is a conservative approach; if the actual start of construction occurs later than 2016 and buildout occurs later than 2035, both the construction equipment fleet and on-road vehicles are assumed to be "cleaner" than would be the case if construction starts in 2016 and buildout occurs in 2035, as described in CARB's 2016 Mobile Source Strategy.[1661] This is so because such later model vehicles will be subject to more stringent emission controls and fuel standards and thus generate less unit emissions with each future year. As such, assuming development of the Project site occurs sooner than is likely to occur provides a more conservative assessment of construction GHG emissions.

The Draft EIR also explained, however, that the rate of Project construction would vary with a variety of factors, including, but not limited to, market demand, weather, and as-found site conditions.[1662] Accordingly, it would be highly speculative to estimate the quantities of grading, building, paving, and painting on a year-by-year basis over a 20 year period.[1663] Therefore, the Draft EIR's GHG analysis assumed that each construction activity would be spread equally over the applicable years but, to be conservative, construction emissions were evaluated for a peak grading year.[1664]

The methodology described above is based on informed judgment and is prepared with a sufficient degree of analysis to allow the public and the Lead Agency to intelligently assess the Project's GHG impacts. This is all that CEQA requires.[1665] Moreover, CEQA permits the Lead Agency to rely on reasonable estimates and assumptions in its analysis, and the Draft EIR is required to evaluate environmental impacts only to the extent that it is reasonably feasible to do so.[1666] Indeed, the Draft EIR's GHG analysis is not required to engage in speculation, nor address all permutations of the data or variations on the issue.[1667,1668] The analytical methodology that the Draft EIR uses to evaluate the Project's GHG impacts satisfies these standards.

It should be noted that this comment provides no evidence to support its implied claim that the Draft EIR's GHG analysis would be different were it to assume that the "Project is not built in the order proposed." Indeed, as discussed in the Draft EIR, climate change is a *global*

1658 *Ibid*.
1659 *Id.,* p. 5.21-51
1660 *Ibid*.
1661 *Ibid*.
1662 *Id.,* p. 5.21-50
1663 *Ibid*.
1664 *Ibid*.
1665 CEQA Guidelines §15151; *Napa Citizens for Honest Gov't v. Nappy County Bd. of Supervisors* (2001) 91 Cal. App. 4th 342, 356
1666 CEQA Guidelines §15151; *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* (1988) 47 Cal. 3d 376, 410
1667 CEQA Guidelines §15145; *San Joaquin Raptor Rescue Ctr. v. County of Merced* (2007) 149 Cal.App.4th 645, 680
1668 *National Parks & Conserv. Ass'n v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1365

phenomenon and the significance of greenhouse gas is inherently cumulative in nature.[1669] Accordingly, the Project's impact related to GHG emissions is appropriately considered on a cumulative level, not on a project level.[1670] This comment provides no evidence that the Project's total contribution to the global inventory of GHGs would be significantly different if the "Project is not built in the order proposed," as compared to the balanced development assumed by the Draft EIR. In any case, please see response to Comment F.8-11 for a discussion of the various mechanisms incorporated into the Centennial Specific Plan and the County Code to ensure that the Project cannot result in long-term development that substantially deviates from the balanced development described in the Draft EIR.

With regards to this comment's assertion that the Draft EIR does not adequately disclose or analyze the Project's GHG impacts, please also see response to Comment F.8-79.

In response to this comment, the following document is hereby added to the administrative record:

California Air Resources Board (CARB). 2015. Greenhouse Gas Quantification Methodology for the Strategic Growth Council Sustainable Agricultural Land Conservation Program Agricultural Conservation Easements Greenhouse Gas Reduction Fund Fiscal Year 2014-2015. Sacramento, CA: CARB. https://www.arb.ca.gov/cc/capandtrade/auctionproceeds/sgcsalcpqm.pdf.

Response to Comment F.8-83:

As discussed in response to Comment F.8-204, the Project takes a very aggressive approach to reducing greenhouse gas (GHG) emissions arising from the Project. Among other things, the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the county's Antelope Valley Area Plan (AVAP) for the purpose of sustainability accommodating regional growth projections in a manner that reduces criteria air pollutant and GHG emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. Indeed, the South Coast Air Quality Management District (SCAQMD) has determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D4-2). See also response to Comment F.8-20 for further discussion.

Consistent with Smart Growth principles, Medium- to Very High Density development is generally included in the central area of each Village, and the density of development progressively lowers with increased distances from core areas, called the Village Core, Town

[1669] DRP 2017, p. 5.21-86
[1670] *Ibid*.

Center or Neighborhood Center.[1671] The Town Center of the Project is located in Village 3, and is the "downtown" area of the Project; Villages 1, 2, 5, and 7 each have a Village Core, and Villages 6, 8, and 9 each have a Neighborhood Center.[1672] An 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center.[1673] Moreover, to reduce vehicle miles traveled, the Project includes an integrated network of roadways, walking and biking trails to reduce automobile use and facilitate safe and efficient travel. An extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) would link residential, schools, shopping, and employment areas.[1674] One hundred percent (100 percent) of all residential development will be located within ¼ miles walking distance of a park, trailhead, club house or other public amenity, and an 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center.[1675]

As discussed in response to Comment F.8-204, the Project has also been designed to aggressively manage waste so as to reduce the Project's overall GHG footprint. With regard to construction waste, the Master Developer is required to provide the County with a plan and monitoring program that commits to diverting from landfill disposal 100 percent of soil during grading activities, and at least 75 percent of nonhazardous construction and demolition waste, which exceeds the 65 percent diversion requirement with the Tier 1 voluntary measure in Section A5.408.3.1 of the California Green Building Standards (CALGreen) Code.[1676] This goal also exceeds the 50 percent reduction required by Section 20.87.040 of the County Code and Sections 4.408.5/5.408.1.4 of the CALGreen Code.

The Project will also implement the residential and nonresidential mandatory measures for material conservation and efficiency that are set forth in Chapter 4 (residential) and Division 5.4 (nonresidential) of the CALGreen Code, including but not limited to:

a. The CC&Rs will require the Property Owner to recycle and divert from the waste bin, solids such as metal, glass, paper, plastic, cardboard, food, and yard waste; and divert from the waste bin hazardous waste, electronic waste, and universal waste. Information on items prohibited from landfill disposal on recycling and composting will be provided to Property Owners.

b. Prior to the issuance of each building permit from commercial properties, including multi-family residences, schools, and places of worship, the Property Owner shall submit to the County a site plan of the property that depicts how solid wastes would be collected and stored for on-site processing, curbside collection, and/or self-hauling.

c. Prior to the sale, lease, or rental of any commercial property, including multi-family residential structures or portions thereof, the Property Owner shall provide to each prospective purchaser or tenant a notice explaining how that property collects and

[1671] *Id.,* p. 4-16
[1672] *Ibid*.
[1673] *Id.,* pp. 4-16, -17
[1674] *Id.,* p. 4-6
[1675] *Id.,* pp. 4-16, -17
[1676] *Id.,* Appendix 2-A to Appendix 4.0-A, p. 25

> stores recyclables, compostables, universal waste, hazardous waste, and electronic waste for on-site processing, curbside collection, and/or self-hauling.[1677]

Finally, the Project Applicant/Master Developer must set aside a minimum of 5 acres for a future Materials Recovery Facility/Transfer Station that includes a household, hazardous waste permanent collection and reuse center and allows for mulching/composting operations.[1678] The Project also requires the establishment and operation of a community waste recycling program including education and outreach, recycled waste pickup and drop-off services.[1679] Please also see responses to Comments F.8-80 and F.8-204 for a list of the many measures and project design features the Project is required to implement to ensure that it not only meets, but exceeds, applicable legal requirements regarding energy and water use efficiency.

The Commenter recommends that the County consider the incorporation of potential mitigation measures contained in lists prepared by CAPCOA and the California Office of the Attorney General (the latter list has actually been incorporated into the former list, and they are one document). The Commenter makes the same suggestion in Comment F.8-204, with an additional suggestion that the County consider mitigation measures in lists prepared by several other agencies. All of the mitigation measures in the two lists identified in this comment and in Comment F.8-204 have been considered and are fully addressed in response to Comment F.8-204. For example, the Attorney General recommends mitigation requiring the enforcement of idling times for construction vehicles, which has been incorporated into the Draft EIR as MMs 11-2 and 21-4. Similarly, CAPCOA recommends mitigation requiring nonresidential use to provide "end of trip" facilities (i.e., showers, lockers) to encourage use of bicycles for commute purposes, which recommendation has been incorporated into MM 11-4. Please refer to response to Comment F.8-204 for a complete explanation of the manner in which the Project and its MMs incorporate the MMs included in the various lists cited in this comment.

Response to Comment F.8-84:

Please see responses to Comments F.8-80 and F.8-204 for a discussion of the various measures the Project will implement to ensure efficient energy use on a Project-wide basis. With respect to "green building" principles, specifically, the Project includes a Green Development Program, which is intended to meet or exceed state, regional, and local requirements for energy efficiency and green building ordinances.[1680] The Centennial Green Development Program's Green Building component requires all residential and non-residential development to comply with CALGreen Code Mandatory Measures, as well as the voluntary CALGreen Tier 1 measures, and to comply with the Los Angeles Green Building Ordinances. Additional measures are also included to further improve energy, water and material management conservation and efficiency, and to assure health building materials and designs, as discussed throughout response to Comment F.8-204. Sustainable and

1677 *Ibid*.
1678 *Ibid*.
1679 *Ibid*.
1680 *Id.,* Appendix 4.0-A, p. M-6

resiliency features will be incorporated in the design from the earliest stages through the final buildout.[1681] The Green Development Program is adopted by resolution and incorporates the County's Green Building Ordinances with respect to development for the Project Site.[1682]

This comment cites a 2008 report by the Commission for Environmental Cooperation, titled *Green Building In North America*, which evaluates the potential for green building to reduce global greenhouse gas emissions. As discussed above, and in responses to Comments F.8-80 and F.8-204, the Project is will implemented in a manner consistent with the cited report's green building recommendations.

Response to Comment F.8-85:

The mitigation measures recommended in this comment are noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. All of the recommended mitigation measures identified in this comment are also recommended in Comment F.8-204, along with other recommended mitigation measures included in lists prepared by several state and local agencies. All of the mitigation measures identified in this comment and in Comment F.8-204 have been considered and are fully addressed in response to Comment F.8-204.

Response to Comment F.8-86:

The mitigation measures recommended in this comment are noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. All of the mitigation measures identified in this comment are included in the mitigation measures that the Commenter recommends in Comment F.8-204, along with other recommended mitigation measures included in lists prepared by several state and local agencies. All of the mitigation measures identified in this comment and in Comment F.8-204 have been considered and are fully addressed in response to Comment F.8-204.

Response to Comment F.8-87:

This comment's reference to the Newhall Ranch project that has committed to a goal of zero net GHG emissions is noted. As discussed in Draft EIR Section 5.21.2, Relevant Plans, Policies, and Regulations, and response to Comment F.8-79, the original EIR certified for the Newhall Ranch project was the subject of the Supreme Court's decision in *Center for Biological Diversity v. Department of Fish and Wildlife,* S217763 (*Newhall*). In that opinion, the Court evaluated the California Department of Fish and Wildlife's (CDFW) analysis of potential impacts caused by GHG emissions contained in the *Newhall* EIR for the proposed land development called Newhall Ranch.[1683] In the *Newhall* EIR, the CDFW analyzed GHG

[1681] *Ibid*.

[1682] *Id.,* p. 2-60

[1683] California, State of. 2015a, Center for Biological Diversity v. Department of Fish and Wildlife (Cal. Supreme Ct., November 30, 2015, No. S217763).

emissions under Assembly Bill (AB) 32, using the business-as-usual (BAU) comparison as its sole criterion of significance.

In *Newhall*, the California Supreme Court concluded that a finding of consistency with meeting statewide emission reduction goals is a legally permissible criterion of significance when analyzing potential impacts of GHG emissions under CEQA. However, the Court found that the *Newhall* EIR's conclusion that the project's emissions would be less than significant under that criterion was not supported by substantial evidence, and remanded back to the appellate court the narrow issue of whether substantial evidence supported the application of AB 32 statewide GHG reduction goal of 29 percent to new land use projects.

On remand, the *Newhall* EIR was set aside by the lower court. In November 2016, the CDFW released a Draft Additional Environmental Analysis (AEA) intended to address the agency's CEQA compliance obligations.[1684] The AEA did not, however, respond to the Supreme Court's direction to provide substantial evidence supporting the 29 percent BAU statutory GHG reduction threshold relied upon by the *Newhall* EIR. The AEA also did not include an assessment of the *Newhall* project's consistency with any of the Court's suggested GHG CEQA compliance pathways, although referenced documentation in the *Newhall* administrative record do include and confirm compliance with each pathway. Instead, as described in the AEA, the *Newhall* project applicant (Five Point LLC) voluntarily modified its project and proposed to achieve "zero net" GHG emissions for the project with the implementation of the project applicant's "zero net emission" proposal, which was made enforceable by the addition of 13 mitigation measures that correspond to the applicant's proposal, as further described in the AEA. The AEA states that the adoption and implementation of the 13 mitigation measures would reduce mobile source, electricity, natural gas, vegetation removal, and construction-related emissions by the amount of emissions estimated for the project and result in no net contributions of GHG emissions from the project, or "zero net emissions." The AEA further concludes that because the project would result in no net increase of GHG emissions after implementation of the mitigation measures, there would be no contribution of GHG emissions to cumulative GHG emissions influencing global climate change and the *Newhall* project would not conflict with any plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs. Consequently, the AEA concludes that project GHG and climate change impacts would be less than significant.[1685]

It is important to note that the *Newhall* AEA does not establish a new significance criteria of any kind, much less a "zero net" GHG threshold under CEQA. In fact, agencies that have considered a zero-threshold approach have rejected it. For example, despite having been urged to propose a zero-emissions CEQA threshold in its proposed amendments to the CEQA guidelines regarding the analysis of GHG emissions released in April 2009 (Proposed Guidelines), the state Office of Planning and Research (OPR) responded in its *Initial Statement of Reasons for Regulatory Action: Proposed Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 97*

[1684] California Department of Fish and Wildlife (CDFW). 2016 (November 3). Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan Draft Additional Environmental Analysis. Sacramento, CA: CDFW.

[1685] *Id.,* pp. 1-18

that Section 15064.4(b)(1) of the Proposed Guidelines is not intended to suggest a zero emission threshold, as CEQA does not include a "one molecule" rule.[1686] (See also, SJVAPCD 2009, page 34 [explaining that OPR's Proposed Guidelines confirm that a lead agency is not responsible for wholly eliminating all GHG emissions from a project].)[1687] In addition, in its report to the Ventura County Air Pollution Control Board on GHG significance thresholds, staff reported that "[n]ot a single California air pollution agency is considering either of the first two approaches for GHG significance thresholds [a "no threshold approach" or a "zero threshold approach"].[1688]

Moreover, with respect to the *Newhall* AEA, the applicant imposed a "zero net emissions" program for GHG; it was not imposed under CEQA by the State of California, which is acting as the lead agency. Unlike a local city or county, the State has direct statutory and regulatory authority to reduce GHG emissions from all sectors of the California economy, including most notably the major sectors producing GHG emissions (electricity production, transportation fuels, and large-scale industrial facilities such as refineries and cement plants). In the *Newhall* AEA, for example, CARB and Cal/EPA were directly involved in – and contemporaneously produced a letter affirming the achievement of – the *Newhall* applicant's "zero net" voluntary proposal. With respect to the project analyzed in the Draft EIR, the County's land use jurisdiction does not extend to having jurisdiction or control over the vast majority of GHG emissions within the state. With respect to consideration of land use project, particularly large-scale projects, the Draft EIR considers, and the Project complies with, SB 375, which is the state's statutory program for ensuring GHG reductions from land use and transportation projects (discussed in Section 5.21.6, Environmental Impacts), as discussed in response to Comment F.8-79.

Contrary to this comment's assertions, CEQA does not require projects to reduce onsite GHG emissions "to the greatest extent practicable," nor does it require the EIR to provide substantial evidence demonstrating that GHG "reductions needed to achieve zero net energy are infeasible." Courts have consistently held that single projects cannot be required to bear a greater than proportional share of mitigating a cumulative significant impact.[1689,1690,1691] This limitation is also expressly stated in CEQA Guidelines §§15041(a), 15126.4(a)(4). Because GHG emissions from transportation, water and waste management and use, heating and cooling of buildings, and a myriad of other activities are common to all new and modified development projects, and are common attributes of simply residing, working or producing

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1686 California Natural Resources Agency (CNRA). 2009. (July). Initial Statement of Reasons for Regulatory Action: Proposed Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97 (p. 20). Sacramento, CA: CNRA. http://resources.ca.gov/ceqa/docs/Initial_Statement_of_Reasons.pdf.

1687 San Joaquin Valley Air Pollution Control District (SJVAPCD). 2009. (December 17). *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA* (p. 34). Fresno, CA: SJVAPCD. https://www.valleyair.org/Programs/CCAP/12-17-09/3%20CCAP%20-%20FINAL%20LU%20Guidance%20-%20Dec%2017%202009.pdf.

1688 Ventura County Air Pollution Control Board (VCAPCB). 2011. *Greenhouse Gas Thresholds of Significance Options for Land Use Development Projects in Ventura County*. Ventura, CA: VCAPCB. http://www.vcapcd.org/pubs/Planning/GHGThresholdReportRevised.pdf.

1689 *Dolan v. City of Tigard* (1994) 512 U.S. 374

1690 *Nollan v. Cal. Coastal Comm.* (1987) 483 U.S. 825, 835 n. 4

1691 *Ehrlich v. City of Culver City* (1996) 12 Cal. 4th 854

goods or services in California, the feasibility of the mitigation measures required for this project must be commensurate with a fair share allocation and not with a hypothetical "zero net" or "net reduction" threshold or standard. Within this cumulative impact mitigation measure framework, all feasible mitigation measures to reduce the Project's GHG emissions impacts have been required and are described in Draft EIR Section 5.21, Climate Change.

The Commenter argued in *Newhall* that a "zero net" approach to mitigating for GHG impacts is required by CEQA. This approach was considered and rejected by the Office of Planning and Research, the expert state agency for implementing CEQA.[1692] The Commenter also urged the Court to adopt this approach in Newhall; the Supreme Court declined to do so and instead identified GHG compliance pathways that included compliance with laws, compliance with SB 375, and compliance with climate action plans.[1693,1694,1695]

It has been California policy that all new residential buildings will be zero net energy (ZNE) by 2020 and new commercial buildings will be ZNE by 2030, as described in the 2008 California Public Utilities Commission (CPUC) long-term energy efficiency strategic plan. In 2013, the California Energy Commission (CEC), in coordination with the CPUC, commenced a process to update the California Building Energy Efficiency Standards (Title 24) and, in 2016, the CEC updated the Title 24 Building Energy Efficiency Standards to establish building design and construction requirements that move closer to achieving California's ZNE goals, with the next update scheduled for 2019. As part of 2019 Building Energy Efficiency Standards rulemaking process, CEC staff has currently determined that ZNE cannot be achieved by 2020 within the confines of existing net energy metering and life cycle costing rules.[1696, 1697] CEC staff has also determined that the State's ZNE goals cannot be achieved until California develops and implements electric grid harmonization strategies that maximize self-utilization of photovoltaic array output and minimize renewable energy exports back to the grid, such as commercially viable battery storage, demand response, thermal storage technologies.[1698,1699] California has, however, continued to make substantial progress toward achieving its ZNE policy, including most recently the CEC's decision to require solar panels on rooftops of most types of new residential buildings.[1700] These and additional future building code standards updates, which must also take into account all

1692 14 CCR. §15000; 15126.4(c)

1693 *Newhall*, Opening Brief on the Merits, pp. 59-70

1694 *Id.,* Newhall's Answer Brief on the Merits, pp. 37-45

1695 Id., p. 229

1696 California Energy Commission, 2019 Building Energy Efficiency Standards PreRulemaking Presentation - Proposed 2019 Building Energy Efficiency Standards ZNE Strategy (Aug. 24, 2017), http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-01/TN220876_20170824T105443_82217_ZNE_Strategy_Presentation.pdf.

1697 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

1698 *Ibid*.

1699 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

1700 California Energy Commission Initial Statement of Reasons for Proposed Building Standards of the California Energy Commission Regarding Code of Regulations, Title 24, Part 1, Chapter 10 and Part 6 (2010 California Energy Code) Docket Number 17-BSTD-02.

applicable statutory building code standards mandates, such as consumer cost effectiveness, are expected to continue the State's trajectory toward achieving its ZNE policy.

The following document is hereby added to the administrative record in response to this comment:

Ventura County Air Pollution Control Board (VCAPCB). 2011. *Greenhouse Gas Thresholds of Significance Options for Land Use Development Projects in Ventura County*. Ventura, CA: VCAPCB. http://www.vcapcd.org/pubs/Planning/GHGThresholdReportRevised.pdf.

Response to Comment F.8-87A:

The document cited by this comment is addressed in response to Comment F.8-87. Please refer to that response for additional information regarding the cited document's relevance to the Project and the Draft EIR.

Response to Comment F.8-88:

This comment's assertion that any offset program must ensure "additionality" is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. This comment accurately quotes the text of Health and Safety Code §38562(d). By its plain terms, Health and Safety Code §38562, inclusive of its subsection (d), applies only to CARB and not the Lead Agency. Health and Safety Code §38562 is not a provision of CEQA and it imposes no obligations on the Lead Agency with respect to its compliance with CEQA. Neither the CEQA statute nor the CEQA Guidelines expressly require lead agencies to ensure "additionality" when relying on GHG offsets as mitigation, as this comment implies. It is noted, however, that CEQA Guideline §15126.4(c)(3) does expressly authorize lead agencies to rely on "offsets that are not otherwise required" to mitigate the GHG impacts of a project. In any case, the Project does not rely on GHG offsets to mitigate the Project's impacts related to GHG emissions not otherwise covered by California's cap-and-trade program.

Response to Comment F.8-89:

This comment's interpretation of Health and Safety Code §38562(d)(2) is noted and will be provided to the Regional Planning Commission and Board of Supervisors for its consideration. As discussed in response to Comment F.8-88, Health and Safety Code §38562, inclusive of its subsection (d)(2), only applies to CARB and does not apply to the Lead Agency. Moreover, Health and Safety Code §38562 is not a provision of CEQA and it imposes no obligations on the Lead Agency with respect to its compliance with CEQA. Please also see response to Comment F.8-88.

Response to Comment F.8-90:

This comment's assertion that Health and Safety Code §38562(d)(2) and its use of the term "additional" also applies in the context of CEQA is noted. The Commenter accurately quotes

CEQA Guideline §15126.4(c)(3). This comment accurately quotes the California Resources Agency's Final Statement of Reasons for adopting CEQA Guideline §15126.4(c)(3). This comment's interpretation of said Final Statement of Reasons is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. Please see response to Comment F.8-88 for additional information regarding Health and Safety Code §38562(d)(2) and CEQA Guideline §15126.4(c)(3).

Response to Comment F.8-90A:

The document cited by this comment is addressed in response to Comment F.8-90. Please refer to said response for additional information regarding the cited document's relevance to the Project and the Draft EIR.

Response to Comment F.8-91:

This comment's request that Project be required to zero net energy and include measures to ensure that any GHG offsets are "additional" is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. Please see responses to Comments F.8-87 through F.8-90A for additional information regarding the concepts of zero net energy and "additional" offsets as they apply to the Project.

Response to Comment F.8-92:

As this comment correctly notes, the Court in *Sierra Club v. Gilroy City Council* described CEQA's mitigation requirements as being among CEQA's most important substantive provisions with which agencies must comply. This comment also accurately quotes a portion of the text of Public Resources Code §21002.

Response to Comment F.8-93:

This comment accurately quotes and paraphrases portions of CEQA Guidelines §15126.4(c). As this comment notes, CEQA Guidelines §15126.4(c) requires lead agencies to consider feasible means to mitigate a project's significant effects related to GHG emissions, which measures may include, among others: (1) Measures in an existing plan or mitigation program for the reduction of emissions that are required as part of the lead agency's decision; (2) Reductions in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in CEQA Guidelines Appendix F; (3) Off-site measures, including offsets that are not otherwise required, to mitigate a project's emissions; (4) Measures that sequester GHGs; (5) In the case of the adoption of a plan, mitigation may include the identification of specific measures that may be implemented on a project-by-project basis. Per CEQA Guidelines §15126.4(c)(5), mitigation may also include the incorporation of specific measures or policies found in an adopted ordinance or regulations that reduces the cumulative effect of emissions.

Response to Comment F.8-94:

Contrary to this comment's claim, the Draft EIR does not incorporate proposed mitigation measures into the Project description in order to conclude that the Project's impacts will be less than significant. In fact, as suggested by this comment, all of the Project Design Features (PDFs) described in Draft EIR Section 5.21.4, Project Design Features, are also incorporated into the Draft EIR as binding and enforceable mitigation measures,[1701] and all are included in the Project's Mitigation Monitoring and Reporting Program (MMRP), which is set forth as Final EIR Appendix 2.0-C.Rev. For reference, the following chart lists by number all of the PDFs described in Section 5.21.4 along with the corresponding Draft EIR mitigation measure that implements each PDF:

Project Design Feature	Corresponding Mitigation Measure(s)
PDF 21-1	MM 21-2
PDF 21-2	MM 21-3
PDF 21-3	MM 21-1
PDF 21-4	MM 21-5
PDF 21-5	MM 21-6
PDF 21-6	MM 21-7
PDF 21-7	MM 21-8
PDF 21-8	MM 21-9
PDF 21-9	MM 10-25; MM 10-26
PDF 21-10	MM 21-14
PDF 21-11	MM 21-15
PDF 21-12	MM 21-16
PDF 21-13	MM 14-1; MM 21-17
PDF 21-14	MM 21-18
PDF 21-15	MM 21-19
PDF 21-16	MM 10-1
PDF 21-17	MM 21-10
PDF 21-18	MM 21-11
PDF 21-19	MM 21-12
PDF 21-20	MM 18-1
PDF 21-21	MM 21-4

Response to Comment F.8-95:

This comment's recommendation that mitigation measures identified in the Draft EIR could be strengthened is noted and will be provided to the Planning Commission. The Draft EIR includes 46 additional mitigation measures to reduce GHG emissions from project operations and/or construction activities (MMs 10-1, 10-25, 10-26, 11-1 through 11-7, 13-6, 14-1, 17-9, 17-10, 18-1, 18-2, 19-1 through 19-5, 20-2.1, 20-2.2, 20-3.1 through 20-3.3, and

[1701] DRP 2017, pp. 5.21-41 to -46

21-1 through 21-20). In addition, the Specific Plan includes additional commitments to sustainable design and operational practices which minimize GHG emissions, as detailed in response to Comment F.8-204, and mitigation measures have been revised and added in response to comments on the Draft EIR to further reduce the Project's GHG emissions. See revised and added mitigation measures as set forth in responses to Comments F.8-204, F.2-2, F.2-5, F.3-29, F.3-34, and F.8-189.

Specifically, regarding renewable energy production, MM 21-1 requires the Project Applicant/Developer to provide the County with plans and specifications that demonstrate 50 percent of the Project's anticipated electrical energy demand at buildout shall be satisfied from on-site renewable energy generation, which may include, but is not limited to, solar, geothermal, biofuel and hydroelectric systems. In addition, MM 21-5 requires the Project to equip a minimum of 70 percent of public and community pools and spas with active solar water hearing systems where heating is necessary or desired, and MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature. MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. Similarly, mitigation measure 21-2 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent.

In addition, the Specific Plan's Green Development Program requires the installation of onsite solar panel systems on roof areas for a minimum of 30 percent of all single-family detached and attached residential units; a minimum of 30 percent of all multi-family residential units, and a minimum of 60 percent of buildings located within Business Park land use designations.

With regard to this comments concern regarding impacts to avian species and wildlife associated with wind energy development, the Project does not propose construction of wind turbines on the Project site. Indeed, Policy COS 13.9 of the Antelope Valley Area Plan expressly prohibits ground-mounted utility-scale renewable energy production facilities within the West EOA, where the Project site is located

This comment's assertion that the electric vehicle (EV) charger should be more widely available is noted for the record and will be provided the Regional Planning Commission and Board of Supervisors for consideration. The Draft EIR includes several mitigation measures to ensure an appropriate amount of EV charging stations will be available to Project residents and visitors. In response to this comment, the relevant mitigation measures have been revised to clarify their application, as follows:

MM 11-4 The Project's plans and specifications for non-residential buildings shall demonstrate that the following features have been incorporated into the building designs. Proof of

compliance shall be provided to the County prior to the issuance of occupancy permits.

a. For buildings with over 10 tenant-occupants, changing/shower facilities shall be provided as specified in Section A5.106.4.3, Nonresidential Voluntary Measures, of the CALGreen Code as follows: for 11 to 50 tenant-occupants, one unisex shower and two 2-tier lockers; for 51 to 100 tenant-occupants, one unisex shower and three 2-tier lockers; for 101 to 200 tenant-occupants, one shower per gender and four 2-tier lockers; and for over 200 tenant-occupants, one shower per gender for each 200 additional tenant-occupants and one 2-tier locker for each 50 additional tenant-occupant.

b. Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code as follows: two for 10 to ~~1~~25 spaces; four for 26 to 50 spaces; six for 51 to 75 spaces; nine for 76 to 100 spaces; eleven for 101 to 150 spaces; 18 for 151 to 200 spaces; and at least 10 percent of total for 201 and more spaces.

c. ~~Facilities~~ Electric Vehicle Charging Spaces (EV Space), as defined by CALGreen Code Section 202, shall be installed to support future installation of ~~e~~Electric ~~v~~Vehicle Supply Equipment (EVSE), as defined by CALGreen Code Section 202, ~~charging~~ at each non-residential building with ~~3~~10 or more parking spaces. Installation of each EV Space shall be consistent with Sections A5.106.5.3 and A5.106.5.3.1, Nonresidential Voluntary Measures (Tier 1), of the CALGreen Code. The EV Space facilities shall meet Section 406.9 (Electric Vehicle) of the *California Building Code* and as follows:

Total Number of Actual Parking Spaces	**Tier 1 Number of Required EV Spaces**
0-9	0
10-25	2
26-50	3
51-75	5
76-100	7
101-150	10
151-200	14
>200	8 percent of total spaces rounded up to nearest whole number

~~**Single charging space requirements.** When only a single charging space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1. The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure.~~

Multiple charging spaces required. When multiple EV Spaces are required, plans shall include the location(s) and type of ~~electrical vehicle supply equipment (~~EVSE~~)~~, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electric vehicles (EV) at all designated EV ~~charging s~~Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Provide raceways from the electrical service panel to the designated parking areas which are required to be installed at the time of construction.

MM 11-6 The Project's plans and specifications for parking structures and parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, park), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, shall demonstrate that the following features have been incorporated into the parking facility.

- The parking facility shall include a minimum of five percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles.
- Five percent of ~~T~~the total number of parking spaces provided in the parking facility, but in no case less than one, shall be Electric Vehicle Parking Spaces (EV Spaces), as defined in CALGreen Code Section 202, capable of supporting future Electric Vehicle Supply Equipment (EVSE), as defined in CALGreen Code Section 202~~include at least one electric vehicle charging station. Electrical lines shall be designed and sized to add additional charging stations when a demand is demonstrated~~. Calculations for the required number of EV Spaces shall

be rounded up to the nearest whole number and ~~T~~the design and installation of each EV Space shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, and Section 4.106.4.2, of the CALGreen Code as follows:

Single charging space requirements. When only a single EV ~~charging s~~Space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure.

Multiple charging spaces required. When multiple EV ~~charging s~~Spaces are required, plans shall include the location(s) and type of ~~electrical vehicle supply equipment (~~EVSE~~)~~, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electric vehicles at all designated EV ~~charging s~~Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Only underground raceways and related underground equipment are required to be installed at the time of construction.

- For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code, or as required by County Code Section 22.52.1225B, whichever is more stringent.

MM 21-15 The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that one 208/240 VAC receptacle that may be used for charging electric vehicles, shall be installed in each detached and attached single-family residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A4.106.4.1. The installation shall comply with requirements of the 2016 CALGreen Code Section 4.106.4.1, or the most applicable code at the time of construction.

MM 21-16 The Project Applicant/Developer shall provide plans and specifications to the County demonstrating that "alternative energy fueling stations" shall be installed as follows. An "alternative energy vehicle fueling station" is a 208/240 VAC electrical vehicle charging station or a station providing another new or improved technology (e.g. compressed natural gas (CNG) and hydrogen fuel cell) that provides refueling for vehicles that do not use fossil fuel. An electric charging station shall allow for simultaneous charging of two electric vehicles.

- Business Park and Institutional land use designations shall provide a minimum of one alternative energy vehicle fueling station on site for the first 50,000 square feet of usable floor space and additional alternative energy vehicle fueling stations for each additional 50,000 square feet of usable floor space thereafter.
- Multi-family residential buildings of at least seventeen ~~20~~ (17) residential units shall provide a minimum of one alternative energy vehicle fueling station for the first ~~twenty~~ seventeen (~~20~~ 17) residential units and an additional alternative energy vehicle fueling station for each additional ~~twenty~~ seventeen (~~20~~ 17) residential units thereafter.
- The Town Center and each Village Center shall provide a minimum of one alternative energy vehicle charging station.
- Designated Transit Hubs shall provide a minimum of one alternative energy vehicle charging station.

MM 21-19 For parking structures and parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, park), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following features have been incorporated into the parking facility:

- The parking facility shall include a minimum of five percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles.
- Five percent of ~~T~~the total number of parking spaces provided in the parking facility, but in no case less than

one, shall be Electric Vehicle Parking Spaces (EV Spaces), as defined in CALGreen Code Section 202, capable of supporting future Electric Vehicle Supply Equipment (EVSE), as defined in CALGreen Code Section 202 ~~include at least one electric vehicle charging station. Electrical lines shall be designed and sized to add additional charging stations for up to three percent of the total parking spaces when a demand is demonstrated.~~ Calculations for the required number of EV Spaces shall be rounded up to the nearest whole number and ~~T~~the design and installation of each EV space shall be consistent with Section A4.106.8.2, Residential Voluntary Measures, and Section 4.106.4.2, of the CALGreen Code as follows:

Single charging space requirements. When only a single EV Space is required, install a listed raceway capable of accommodating a dedicated branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall be securely fastened at the main service or subpanel and shall terminate in close proximity to the proposed location of the charging system into a listed cabinet, box or enclosure.

Multiple charging spaces required. When multiple EV Spaces are required, plans shall include the location(s) and type of EVSE, raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to charge simultaneously all the electrical vehicles at all designated EV Spaces at their full rated amperage. Plan design shall be based on Level 2 EVSE at its maximum operating ampacity. Only underground raceways and related underground equipment are required to be installed at the time of construction.

- For residential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code, or as required by County Code Section 22.52.1225B, whichever is more stringent.

The above mitigation measures go well beyond the mandatory regulatory requirements with respect to the provision of EV charging infrastructure. For example, MM 11-4 requires all Project nonresidential building with 10 or more parking spaces to install Electric Vehicle Charging Spaces (EV Spaces) in accordance with CALGreen Code Section A.5.106.5.3,

Nonresidential Voluntary Measures (Tier 1). This normally voluntary commitment is made a requirement of the Project by MM 11-4, thus ensuring that the Project will substantially exceed the CALGreen Code's mandatory requirements for the provision EV Spaces at nonresidential buildings, as shown by the following chart:

Nonresidential Building Parking Space Total	Legally Required Number of EV Spaces (CALGreen § 5.106.5.3)	MM 11-4 Required Number of EV Spaces (CALGreen §A5.106.5.3)
0-9	0	0
10-25	1	2
26-50	2	3
51-75	4	5
76-100	5	7
101-150	7	10
151-200	10	14
>200	6 percent of total	8 percent of total

MM 11-4 also requires the Project to exceed mandatory regulatory requirements with respect to the Project's provision of preferential parking for low-emitting, fuel efficient, and carpool vehicles at nonresidential, and with respect to the provision of onsite showers and lockers at nonresidential buildings to encourage workforce occupants to walk and bike to their jobs.

Under existing law, three percent, but in no case less than one, of the parking spaces provided for multifamily residential buildings with 17 units or more must be constructed as EV Spaces. MMs 11-6 and 21-19 expand on this requirement by requiring the Project to ensure that five percent of such spaces are constructed EV Spaces in accordance with the CALGreen Code Tier 1 Residential Voluntary Measures. Indeed, MMs 11-6 and 21-19 go even farther than the CALGreen Code Tier 1 voluntary measures by requiring the Project to also ensure that five percent of the total number of parking spaces in parking structures and parking lots that serve uses other than residential or nonresidential buildings, such as parks or trailheads, and which have 20 or more total spaces, are constructed as EV Spaces. Finally, MMs 11-6 and 21-19 go beyond applicable law by also requiring that bike parking be provided in residential parking facilities consistent with the requirements of CALGreen Code Residential Voluntary Measure A4.106.9.

In addition, MM 21-15 goes beyond the requirements of applicable law by requiring the Project to install a EV charging receptacle in every detached and attached single-residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A.4.106.4.1. Existing law – i.e., CALGreen Code Section 4.106.4.1 - merely requires that detached and attached single-family residences be wired to accommodate a EV charging receptacle to be install by the homeowner, if installed at all. Finally, existing law does not require any residential or nonresidential projects to provide electric vehicle charging stations or other form of alternative energy fueling station for low-emission or alternative fueled vehicles. The Project, however, will be required to go beyond the requirements of existing law by requiring the installation of alternative energy vehicle fueling stations (EVFS) (i.e., an electrical vehicle charging station or a station providing another new or improved technology) in the amounts

set forth in MM 21-16, as revised above. In response to this comment, MM 21-16 has been revised to (i) lower the threshold size of multi-family residential buildings that will qualify for at least one EVFS from 20 units to 17 units, and (ii) increasing the number EVFS that must be installed in a qualifying multi-family residential building by requiring one EVFS per every 17 units, rather than one EVFS per every 20 units. The combination of these measures, all of which go well beyond the requirements of existing law will ensure that EVFS will be widely available to residents of multi-family residential units and people traveling to the Project site.

The Lead Agency declines to adopt this comment's recommendation that EV chargers in commercial parking lots be equipped with "Level 3" DC fast charging equipment, rather than Level 2 charging equipment. First, California Air Resources Board staff has determined that Level 2 chargers is "the preferred EV charging method for public and private facilities" and is "typically found in public areas, parking garages and commercial business".[1702] As determined by the U.S. Environmental Protection Agency, "Level 3 chargers require significantly more capital and planning and thus make Level 2 [charging] deployment options more appealing despite longer charge times. In addition to the cost aspect, the installation process can often be complex, requiring permits and discussions with the utility".[1703] This determination is consistent with the findings of the California Office of Planning Research, which concluded that, "[c]ompared with Level 1 or Level 2 charging, direct current (DC) fast charging entails a much higher cost (currently $20,000 - $50,000 plus installation costs".[1704] Finally, most commercially available electric vehicles can only charge at Level 1 or 2, and those few manufactures that do offer Level 3 charging are either experiencing technical problems that require limiting the vehicle's fast charging abilities or they can't agree on the which of the three most common fast charging standards to use in their vehicles.[1705,1706,1707,1708] For these reasons, MMs 11-4 and 11-6 require the Project to design multiple EVFS based on Level 2 EVSE at its maximum operating ampacity, rather than Level 3.

1702 California Air Resources Board (CARB). 2015 (July 9). EV Charging Infrastructure Provisions CALGreen_Code Sections 5.106.5.3 and A5.106.5.3, Economic and Fiscal Impact Statement Attachment (p.28). Sacramento, CA: CARB. https://www.documents.dgs.ca.gov/bsc/2015TriCycle/CAC/Green/Exhibit-B-CARB-Cost-Analysis-and-Technical-Report.pdf.

1703 U.S. Environmental Protection Agency (EPA). 2013 (September). Energy Star Market and Industry Scoping Report Electric Vehicle Supply Equipment (EVSE) September 2013 (p. 4). Washington, DC: EPA. https://www.energystar.gov/sites/default/files/asset/document/Electric_Vehicle_Scoping_Report.pdf.

1704 California Office of Planning and Research (OPR). 2013. Zero-Emission Vehicles in California: Community Readiness Guidebook (p. 55). Sacramento, CA: OPR. http://opr.ca.gov/docs/ZEV_Guidebook.pdf.

1705 ChargePoint, Inc. Drivers Checklist: A Quick Guide to Fast Charging (p. 2). https://www.chargepoint.com/files/Quick_Guide_to_Fast_Charging.pdf.

1706 Lawrence, Eric D. (Lawrence). 2017 (April). Debate over charging stations slows electric car growth in Michigan. Detroit, MI: Detroit Free Press. http://www.freep.com/story/money/cars/2017/04/19/consumers-energy-electric-vehicle-plan/99796440/.

1707 Brown, Aaron (Brown) 2017 (May 8). Tesla explains why it sometimes limits supercharging speeds. New York, NY: The Drive. http://www.thedrive.com/tech/10070/tesla-explains-why-it-sometimes-limits-supercharger-charging-speeds.

1708 McDonald, Zach (McDonald). 2016 (Feb. 4). A Simple Guide to DC Fast Charging. Waterloo, Ontario, Canada: FleetCarma. https://www.fleetcarma.com/dc-fast-charging-guide/.

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

Brown, Aaron (Brown) 2017 (May 8). Tesla explains why it sometimes limits supercharging speeds. New York, NY: The Drive. http://www.thedrive.com/tech/10070/tesla-explains-why-it-sometimes-limits-supercharger-charging-speeds.

California Air Resources Board (CARB). 2015 (July 9). EV Charging Infrastructure Provisions CALGreen_Code Sections 5.106.5.3 and A5.106.5.3, Economic and Fiscal Impact Statement Attachment. Sacramento, CA: CARB. https://www.documents.dgs.ca.gov/bsc/2015TriCycle/CAC/Green/Exhibit-B-CARB-Cost-Analysis-and-Technical-Report.pdf.

California Office of Planning and Research (OPR). 2013. Zero-Emission Vehicles in California: Community Readiness Guidebook. Sacramento, CA: OPR. http://opr.ca.gov/docs/ZEV_Guidebook.pdf.

ChargePoint, Inc. Drivers Checklist: A Quick Guide to Fast Charging. https://www.chargepoint.com/files/Quick_Guide_to_Fast_Charging.pdf.

Lawrence, Eric D. (Lawrence). 2017 (April). Debate over charging stations slows electric car growth in Michigan. Detroit, MI: Detroit Free Press. http://www.freep.com/story/money/cars/2017/04/19/consumers-energy-electric-vehicle-plan/99796440/.

McDonald, Zach (McDonald). 2016 (Feb. 4). A Simple Guide to DC Fast Charging. Waterloo, Ontario, Canada: FleetCarma. https://www.fleetcarma.com/dc-fast-charging-guide/.

U.S. Environmental Protection Agency (EPA). 2013 (September). Energy Star Market and Industry Scoping Report Electric Vehicle Supply Equipment (EVSE) September 2013. Washington, DC: EPA. https://www.energystar.gov/sites/default/files/asset/document/Electric_Vehicle_Scoping_Report.pdf.

Response to Comment F.8-96:

The Commenter's opinion about the adequacy of the Draft EIR's GHG analysis is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. Contrary to this comment's claim, the Draft EIR is not required to explain why "stronger mitigation measures – including zero net energy standards – are infeasible." An EIR must describe feasible measures that could minimize the Project's significant adverse impacts.[1709] "Nothing in CEQA requires an EIR to explain why certain mitigation measures are infeasible."[1710] Moreover, for the reasons discussed in

[1709] CEQA Guidelines §15126.4(a)(1)
[1710] *Clover Valley Found. V. City of Rocklin* (2011) 197 Cal.App.4th 200, 245

response to Comment F.8-87, CEQA does not require projects to reduce on-site GHG emissions to net zero levels, nor does it impose such a standard on the Project.

As discussed in response to Comment F.8-79, the Project's potential GHG impacts were fully disclosed and analyzed in Section 5.21 of the Draft EIR. Moreover, the Draft EIR includes mitigation measures which require compliance with a non-exclusive list of laws and regulations requiring GHG reductions in equipment, activities, facilities and services associated with the project (MM 21-20) The Draft EIR also includes 45 additional mitigation measures to reduce GHG emissions from project operations and/or construction activities (MMs 10-1, 10-25, 10-26, 11-1 through 11-7, 13-6, 14-1, 17-9, 17-10, 18-1, 18-2, 19-1 through 19-5, 20-2.1, 20-2.2, 20-3.1 through 20-3.3, and 21-1 through 21-19). In addition, the Specific Plan includes additional commitments to sustainable design and operational practices which minimize GHG emissions, as detailed in response to Comment F.8-204, and mitigation measures have been revised in response to comments on the Draft EIR to further reduce the Project's GHG emissions. See revised and added mitigation measures as set forth in responses to Comments F.8-95, F.8-204, F.2-2, F.2-5, F.3-29, F.3A-46, and F.8-189.

In the *Newhall* litigation, the Commenter argued that the court should adopt a "zero net" approach to mitigating for GHG impacts on the basis that it is required by CEQA. The Supreme Court declined to do so and instead identified GHG compliance pathways that included compliance with laws, compliance with SB 375, and compliance with climate action plans.[1711,1712,1713] The Commenter's recommended "net zero" approach was also considered and rejected by the Office of Planning and Research, the expert state agency for implementing CEQA.[1714]

This comment's claim that the Draft EIR does not provide substantial evidence to support its determination that the Project's climate change impacts would be significant and unavoidable is not supported by the facts. As discussed in Section 5.21, Climate Change,[1715] and in response to Comment F.8-79, the Draft EIR evaluated the Project's GHG impacts using three of the pathways to compliance identified by the Newhall court – i.e., compliance with applicable regulatory programs (under Threshold 21-1), compliance with an SB 375 sustainable communities strategy, the SCAG 2016 RTP/SCS (under Threshold 21-2), and compliance with an adopted climate action plan, the Los Angeles CCAP (under Threshold 21-2).

As discussed in Draft EIR pages 5.21-48 through 5.21-70, the Draft EIR determined that the Project would comply with, and would be consistent with, applicable regulatory programs designed to reduce GHG emissions and would thus contribute to the achievement of AB 32's greenhouse gas reduction goals. Since the Project would comply with applicable regulatory programs designed to reduce GHG emissions, the Draft EIR found that the Project-level impact related to GHG emissions could be considered less than significant under Threshold 21-1. Furthermore, as discussed in Draft EIR pages 5.21-72 through 5.21-86, the

1711 *Newhall*, Opening Brief on the Merits, pp. 59-70,
1712 *Id.,* Newhall's Answer Brief on the Merits, pp. 37-45
1713 *Id.,* p. 229
1714 14 CCR §15000; 15126.4(c)
1715 DRP 2017, pp. 5.21-46 to -86

Draft EIR determined that the Project would be consistent with both the Los Angeles CCAP, (which meets the requirements for a programmatic climate action plan specified in Section 15183.5 of the State CEQA Guidelines) and the SCAG 2016 RTP/SCS, the regional sustainable communities strategy prepared pursuant to SB 375. Since the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and would be consistent with, and not conflict with, an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions, the Draft EIR determined that the Project-level impact related to GHG emissions could be considered less than significant under Threshold 21-2.

However, climate change is a global phenomenon and the significance of greenhouse gas emissions is inherently cumulative in nature. Accordingly, the Project's impact related to GHG emissions is most appropriately considered on a cumulative level, not on a project level. To date, California remains a global leader in mandating GHG emission reductions across a broad spectrum of economic sectors, and most other nations and states have not enacted regulations similar to those adopted in California. California also has nearly the lowest level of GHG per capita of any state. However, as explained on Draft EIR page 5.21-86, it is a fact that the County of Los Angeles has no jurisdictional control or responsibility for GHG reductions in other parts of California (and certainly not in the context of global action), which all contribute to climate change. In addition, it is a fact that the County does not have jurisdiction to enforce statewide implementation of all of the applicable GHG-reducing regulatory programs with which the Project (and other statewide projects) must comply. Although many other agencies with the necessary jurisdiction are currently taking action to reduce GHG emissions, the County cannot assure that these measures would ultimately be implemented by such agencies or sufficient to address climate change given its jurisdictional limitations. Therefore, the Draft EIR conservatively determined that the Project's incremental contribution to the global GHG emissions inventory would be considered cumulatively considerable and that this cumulative impact would be significant and unavoidable, even though the Project satisfies several "pathways to compliance" identified by the *Newhall* court.[1716] Since this Draft EIR determination is based on fact (i.e., the County's limited jurisdiction to enforce statewide regulatory programs), it is supported by substantial evidence, despite this comment's claim to the contrary.[1717]

While the Project has been designed and will have much lower per capita and per residential unit GHG emissions in relation to existing average per capita and per residential unit GHG emissions, the majority of Project GHG emissions occur from vehicular emissions that fall solely within the jurisdiction and control of federal and state agencies (e.g., in regulating the types and fuel efficiencies of vehicles), and in generating electricity within the grid serving the Project region including the Project site. Vehicular GHG emission reductions, for example, are achieved under the state's stringent GHG laws[1718] from a combination of existing legal mandates, including but not limited to the Cap and Trade program covering all fossil fuel related emissions from "wells to wheels," mandatory increases in non-fossil fuel vehicles, and compliance with regional land use and transportation strategies to reduce GHG from

[1716] *Id.,* p. 5.21-86

[1717] CEQA Guidelines §15384

[1718] S.B. 32, 2015–2016 Reg. Sess. (Cal. 2016); Assemb. B. 32, 2005–2006 Reg. Sess. (Cal. 2006).

land use and transportation patterns.[1719] Similarly, electricity generation from renewable resources such as solar and wind power, is mandated under state laws,[1720] and is also subject to evolving and improving technologies (e.g., storage) and governance frameworks (e.g., multi-state grid integration). Achieving a "net zero" greenhouse gas reduction outcome within the Project boundaries for transportation, electric generation, and other offsite sources that are outside the jurisdiction and control of Los Angeles County is infeasible. Other development applicants have proposed "net zero" greenhouse gas projects which require payments of fees or costs for offsite GHG reductions; however, imposing such external costs on a Project increases Project costs and reduce the affordability of Project housing.[1721,1722,1723] Extraordinarily high existing housing costs have already caused California to have the highest poverty rate in the nation according to the US Census,[1724] which in turn has already a substantial net out-migration of California's working families to much higher per-capita GHG states such as Texas, Nevada and Arizona.[1725] Increasing Project housing costs and reducing Project affordability will further exacerbate the California housing crisis and encourage more out-migration to higher per capita GHG states. Although greenhouse gas is a global pollutant for which reductions can be achieved in other countries and continents, mandating and monitoring such offsite reductions is outside the jurisdiction and control of the lead agency for CEQA purposes. Also, please see response to Comment F.8-87; all feasible mitigation measures to reduce the Project's GHG emissions impacts have been required and are described in Draft EIR Section 5.21, Climate Change.

It has been California policy that all new residential buildings will be zero net energy (ZNE) by 2020 and new commercial buildings will be ZNE by 2030, as described in the 2008 California Public Utilities Commission (CPUC) long-term energy efficiency strategic plan. In 2013, the California Energy Commission (CEC), in coordination with the CPUC, commenced a process to update the California Building Energy Efficiency Standards (Title 24) and, in 2016, the CEC updated the Title 24 Building Energy Efficiency Standards to establish building design and construction requirements that move closer to achieving California's ZNE goals, with the next update scheduled for 2019. As part of 2019 Building Energy Efficiency Standards rulemaking process, CEC staff has currently determined that ZNE cannot be achieved by 2020 within the confines of existing net energy metering and life cycle costing

[1719] Governor's Office of Planning and Research (OPR). 2016 (Jan. 20). Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA. Sacramento, CA: OPR. https://perma.cc/8EWJ-MV3Y.

[1720] CCR. Title 24, Part 11

[1721] California Energy Commission (CEC). 2017 (August 22). Zero Net Energy Strategy Presentation. Sacramento, CA: CEC.

[1722] Governor's Office of Planning and Research (OPR). 2016 (January 20). Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA. Sacramento, CA: OPR.

[1723] California Air Resources Board (CARB). 2017 (January 20). *The 2017 Climate Change Scoping Plan Update* (p. 39). Sacramento, CA: CARB. https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf.

[1724] Walters, Dan. 2017 (August 13). Why does California have the nation's highest poverty level? Sacramento, CA: CALMATTERS. https://perma.cc/GMM9-QWUA.

[1725] Lynch, Drew. 2017 (September 21). Californians Consider moving to rising housing costs, poll finds. CAL WATCHDOG.

rules.[1726, 1727] CEC staff has also determined that the State's ZNE goals cannot be achieved until California develops and implements electric grid harmonization strategies that maximize self-utilization of photovoltaic array output and minimize renewable energy exports back to the grid, such as commercially viable battery storage, demand response, thermal storage technologies.[1728,1729] California has, however, continued to make substantial progress toward achieving its ZNE policy, including most recently the CEC's decision to require solar panels on rooftops of most types of new residential buildings.[1730] These and additional future building code standards updates, which must also take into account all applicable statutory building code standards mandates, such as consumer cost effectiveness, are expected to continue the State's trajectory toward achieving its ZNE policy.

This comment cites *Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal. App. 4th 587, 600 to support its claim that the Draft EIR must base its determination that the Project's cumulative GHG impacts would be significant and unavoidable on substantial evidence. However, *Uphold Our Heritage* is inapposite. In that case, the court overturned a lead agency's CEQA finding that certain project alternatives analyzed in the challenged EIR were economically infeasible because that finding was not supported by substantial evidence in the record.[1731] Here, the EIR does not claim, and the Lead Agency has not found, that any of the alternatives identified in the EIR, or recommended by the Commenter, are economically infeasible. However, this comment is noted for the record and will be provided to the Planning Commission and City Council for consideration.

Response to Comment F.8-97:

Appendix F of the State California Environmental Quality Act (CEQA) Guidelines requires consideration of energy consumption, and the efficiency of that consumption, as part of an EIR; but does not require the analysis of whether the example energy conservation measures could be adopted. Consistent with the requirements of Appendix F, energy use and conservation, both direct and indirect, are addressed in several sections of the Draft EIR because these subjects touch on several different topics under CEQA. Appendix 2-A of Draft EIR Appendix 4.0-A presents the Centennial Project's Green Development Program, which details all the sustainable development practices that would be incorporated into the Project. This includes energy efficiency. Because the Draft EIR is analyzing implementation of the Specific Plan, including its Appendices such as the Green Development Program, the Draft

1726 California Energy Commission, 2019 Building Energy Efficiency Standards PreRulemaking Presentation - Proposed 2019 Building Energy Efficiency Standards ZNE Strategy (Aug. 24, 2017), http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-01/TN220876_20170824T105443_82217_ZNE_Strategy_Presentation.pdf.

1727 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

1728 *Ibid*.

1729 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

1730 California Energy Commission Initial Statement of Reasons for Proposed Building Standards of the California Energy Commission Regarding Code of Regulations, Title 24, Part 1, Chapter 10 and Part 6 (2010 California Energy Code) Docket Number 17-BSTD-02

1731 147 Cal. App. 4th at 598-599

EIR analyzes all proposed energy conservation measures. These are considered Project Design Features (PDFs). As discussed on Draft EIR page 2-6, "Because PDFs have been incorporated into the Project, they do not constitute mitigation measures as defined by CEQA. However, if the PDFs have mitigation value to reduce a potentially significant impact, then a corresponding mitigation measure has been prepared to ensure the implementation of the measure through the Mitigation Monitoring and Reporting Program (MMRP)". The Draft EIR includes PDFs and, where appropriate mitigation measures, related to energy conservation, or otherwise addresses energy efficiency, in the following sections, for example: 5.8, Land Use, Entitlements, and Planning (Table 5.8-1, pages 5.8-49, 5.8-52 through 5.8-58, and 5.8-69); 5.10, Traffic, Access, and Circulation (MM 10-1, page 5.10-144); 5.11, Air Resources (PDF 11-2, page 5.11-30; PDF 11-3, page 5.11-30); 5.18, Water Resources (PDF 18-2, page 5.18-39; MM 18-1, page 5.18-75); 5.19, Wastewater Collection (PDFs 19-1 and 19-3, page 5.19-8); 5.20, Dry Utilities (pages 5.20-11 and -12 under heading "Energy Conservation in the Project"; pages 5.20-21 under heading "Energy Conservation in the Project"; pages 5.20-21 and -22 under heading "Vehicle Trip Reductions in the Centennial Project"); and 5.21, Climate Change (PDFs 21-1 through 21-8 on pages 5.21-42 and -43; "Energy Use" analysis beginning on page 5.21-56; "Water Supply, Treatment, and Distribution" analysis beginning on page 5.21-60; "Mobile Sources" analysis beginning on page 5.21-62; MMs 21-1 through 21-13, MM 21-15 through 21-20 on pages 5.21-88 through -93). As such, wherever energy conservation is relevant to the analysis of environmental impacts, the appropriate energy efficiency features of the proposed Project, presented in PDFs and MMs, are part of the analysis of environmental impacts and associated conclusions.

Please see also response to Comment F.8-204, which thoroughly addresses specific energy-related MMs suggested for incorporation by the Commenter.

Response to Comment F.8-98:

Contrary to this comment's claim, Draft EIR page 5.2-18 does not state that 55 percent of the Project site is in the Gorman Drainage Area. Rather, Draft EIR page 5.2-18 states that 55 percent of the Gorman Drainage Area is located within the Project site.

As discussed in response to Comment D.3-7, the following changes have been incorporated into the Draft EIR to match the numbers in Appendix 5.2-B:

The fourth and fifth sentences in the third paragraph on page 3-5 of the Draft EIR have been revised to read:

> Approximately 4.2 ~~ten~~ percent of the Project site is within the Gorman Drainage Area and the Los Angeles RWQCB (Region 4). However, ~~90~~ 95.8 percent of the Project site is located within the jurisdiction of the Lahontan Regional Water Quality Control Board (Lahontan RWQCB), which has been designated "Region 6" by the SWRCB (see Exhibit 5.2-1, Regional Water Quality Control Board Boundaries).

The first and second sentences in the third paragraph on page 4-54 of the Draft EIR have been revised to read:

> Approximately ~~93~~ 95.8 percent of the Project site is within the jurisdiction of the Lahontan Regional Water Quality Control Board (Lahontan RWQCB); this area is not covered by an MS4 Permit due to the lack of development in the area. The remaining approximately ~~7~~ 4.2 percent of the Project site is within the jurisdiction of the Los Angeles Regional Water Quality Control Board (Los Angeles RWQCB); an MS4 permit has been approved by the Los Angeles RWQCB and is applicable to the portion of the site under the Los Angeles RWQCB's jurisdiction.

These changes to the Draft EIR are incorporated by reference into subsequent sections of the Draft EIR. These changes do not alter the analysis or conclusions related to Project impacts on water quality or hydrology.

Response to Comment F.8-99:

Drainages within the Project area are discussed in Section 3.1.5, Hydrology and Drainage Characteristics, and on pages 5.2-15 to 5.2-18 of the Draft EIR, which discuss Gorman Creek, Oso Creek, Quail Lake, and the Santa Clara River. As discussed in Draft EIR Section 5.2.5 and in Section 5.7, Biological Resources (specifically, Threshold 7-3), and as shown in Exhibit 5.2-5, Receiving Channels of Concern and 100-Year Floodplain, the Project will avoid most of the watercourses and watershed areas in the Gorman Creek, Quail Lake, and Oso Creek Drainage Areas. Approximately ten percent of the proposed development would occur west of the West Branch of the Aqueduct, and drainage impacts in this area would primarily affect Oso Creek tributaries flowing north from the southern side (i.e., the northerly face) of Oso Canyon. Drainage impacts in the Gorman Creek Drainage Area would largely be avoided. No watercourse impacts would occur in the Quail Lake Drainage Area.

Approximately 90 percent of the proposed development would occur east of the West Branch of the Aqueduct. As discussed in Draft EIR Section 5.2.5 and in Section 5.7, Biological Resources (specifically, Threshold 7-3), and as shown in Exhibit 5.2-5, Receiving Channels of Concern and 100-Year Floodplain, 18 of the proposed regional detention and retention basins will be located to the east of the Aqueduct. Smaller drainages in this location would generally be integrated with the Project's storm drain system. Flow patterns associated with several existing larger tributary systems, including the East Tributary systems and the Cow Spring Canyon, Horse Camp Canyon, the 300th Street Tributary systems, will largely be maintained by avoiding or constructing flow controls in existing channels or by recreating existing channels after site grading. Flow, low impact development (LID), and hydromodification management facilities (e.g., detention and retention basins) will be constructed adjacent to channels, primarily in downstream reach locations.

Potential hydrology and flood impacts to Quail Lake are discussed on Draft EIR page 5.2-25, which states that no receiving channels will receive Project development area runoff discharges under developed conditions in the Quail Lake drainage area, which includes the lake. Potential water quality impacts to Quail Lake are discussed on Draft EIR page 5.4-68, which states that no runoff from Project developed areas will occur in the Quail Lake watershed, which includes the lake. Consequently, no runoff from Project developed areas

will flow to or occur within Quail Lake, and the Quail Lake drainage and watershed will not affect the hydrology, flood, or water quality conditions in the lake and the lake's watershed and drainage system.

Potential water quality impacts to the Santa Clara River are discussed in Draft EIR Section 5.4, Water Quality, and in Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report, Section 7.6, Impacts to the Santa Clara River. Potential impacts to the Santa Clara River was determined to be less than significant because: (a) the Project area that drains into the Santa Clara River watershed comprises approximately 822 acres, or 0.08 percent of the 1,634 square-mile Santa Clara River watershed; (b) Project discharges occur significantly upstream of the Santa Clara River (approximately 35 miles) and mix with natural area drainage in Gorman Creek and with State Water Project (SWP) water in two storage reservoirs, Pyramid Lake and Lake Piru, prior to draining to the Santa Clara River; (c) the natural hydrologic connection between Project discharges and the Santa Clara River has been significantly altered and interrupted by the construction of intervening waterbodies, including Pyramid Lake and Piru Lake, and water quality in the Santa Clara River drainage is dominated by the operation of these facilities as part of the SWP system; and (d) as discussed below, the analysis of Project concentrations or pollutants of concern in runoff from developed areas are below all benchmark water quality objectives and will not significantly impact receiving waters or any designated beneficial uses for these waters, including the Santa Clara River.

The Draft EIR provides a detailed and thorough analysis of water quality impacts potentially associated with all proposed Project development and land uses in Section 5.4, Water Quality, and Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report. Pertinent hydrological information for the water quality analysis in included in Section 5.2, Hydrology and Flood, Draft EIR Appendix 5.2-A, Centennial Master Plan Hydrology, and Appendix 5.2-B, Centennial Project Hydromodification Technical Report. As discussed on pages 5.4-31 to 5.4-34 of the Draft EIR, the Project analysis of water quality impacts considered a representative range of potential pollutants of concern that could affect surface and groundwater from the construction and development of the Project based on the proposed land uses in the Project site. Pollutants of concern were analyzed in the Draft EIR if they exhibited one or more of the following deleterious characteristics: (a) current loadings or historic deposits of a pollutant impact the beneficial uses of a receiving water; (b) elevated levels of a pollutant are found in sediments of a receiving water and/or have the potential to bioaccumulate in organisms therein; or (c) the detectable inputs of a pollutant at concentrations or loads would be considered potentially toxic to humans and/or flora and fauna.

The Draft EIR analyzed pollutants of concern that are anticipated to be or could potentially be generated by the Project at concentrations that exhibit any of the these characteristics based on water quality data collected in Los Angeles County from land uses that are proposed by the Project, consideration of the Los Angeles Regional Water Quality Control Board Basin Plan and the Lahontan Regional Water Quality Control Board Basin Plan beneficial uses and water quality objectives, California Toxic Rule (CTR) criteria, and current federal Clean Water Act Section 303(d) listings. The reasons for identifying certain pollutants of concern,

the significance criteria used to analyze these constituents, and the rationales for not considering certain potential constituents in the analysis are discussed in detail in Section 5.4, Water Quality, and Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report. As discussed on pages 5.2-38 to 5.2-39, the Draft EIR water quality impact analysis quantitatively analyzes the following pollutants of concern for which there are sufficient flow composite sampling data in the Los Angeles County database:

- TSS (sediment)
- Total Phosphorus
- Nitrate Nitrite-Nitrogen, Ammonia, and Total Nitrogen
- Total and Dissolved Copper
- Total Lead
- Total and Dissolved Zinc
- Chloride

Post-development storm water runoff water quality impacts associated with the following pollutants of concern that could be generated by proposed Project land uses, including commercial and industrial land uses, were qualitatively addressed due to the unavailability of flow composite sampling data based on literature information and professional judgment:

- Turbidity
- Pesticides
- Pathogens (bacteria, viruses, and protozoa)
- Petroleum hydrocarbons (oil and grease, PAHs)
- Trash and debris
- MBAS
- Toxicity
- Emerging Contaminants

As discussed on Draft EIR pages 5.4-21 to 5.4-22, the Draft EIR considered all of the applicable Lahontan Regional Water Quality Control Board Basin Plan and Los Angeles Regional Water Quality Control Board Basin Plan beneficial uses and water quality objectives, including Basin Plan beneficial uses and water quality objectives that protect wildlife and wildlife habitat.

The Lahontan Regional Water Quality Control Board Basin Plan wildlife and habitat beneficial use designations considered in the Draft EIR include:

- COLD: Cold freshwater habitat to support cold water ecosystems;
- WILD: Wildlife habitat waters that support wildlife habitats;
- RARE: Waters that support rare, threatened, or endangered species and associated habitats; and
- SPWN: High quality aquatic habitats suitable for reproduction and early development of fish.

Los Angeles Regional Water Quality Control Board Basin Plan wildlife and habitat beneficial use designations considered in the Draft EIR include:

- WARM: Warm freshwater habitat to support warm water ecosystems (an intermittent beneficial use);
- COLD: Cold freshwater habitat to support cold water ecosystems (an intermittent beneficial use);
- WILD: Wildlife habitat waters that support wildlife habitats; and
- RARE: Waters that support rare, threatened, or endangered species and associated habitats (a potential beneficial use).

Other Lahontan Regional Water Quality Control Board Basin Plan surface water beneficial use designations considered in the Draft EIR include:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing or potential);
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing or potential);
- GWR: Natural or artificial groundwater recharge (existing or potential);
- FRSH: Natural or artificial maintenance of surface water quantity or quality (e.g., salinity) (existing or potential);
- REC-1: Recreational bodily contact with water, where ingestion is reasonably possible (existing or potential);
- REC-2: Recreational activities involving contact in proximity to water, but not involving body contact (existing or potential);
- COMM: Commercial or recreational collection of fish or other organisms (existing or potential).
- COLD: Cold freshwater habitat to support cold water ecosystems;
- WILD: Wildlife habitat waters that support wildlife habitats;
- RARE: Waters that support rare, threatened, or endangered species and associated habitats; and
- SPWN: High quality aquatic habitats suitable for reproduction and early development of fish.

The Draft EIR evaluates the Project's potential impact on the following groundwater beneficial use designations identified in the Lahontan Regional Water Quality Control Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing or potential).
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing or potential).
- IND: Industrial activities that do not depend primarily on water quality (existing or potential).
- FRSH: Natural or artificial maintenance of surface water quantity or quality (e.g., salinity) (existing or potential).

Other Los Angeles Regional Water Quality Control Board Basin Plan surface water beneficial use designations considered in the Draft EIR include:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (intermittent and conditional [i.e., may be considered for exemptions at a later date]).
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (intermittent).
- GWR: Natural and artificial groundwater recharge (intermittent).
- REC-1: Recreational bodily contact with water where ingestion is reasonably possible (intermittent).
- REC-2: Recreational activities involving contact in proximity to water (intermittent).
- WARM: Warm freshwater habitat to support warm water ecosystems (an intermittent beneficial use);
- COLD: Cold freshwater habitat to support cold water ecosystems (an intermittent beneficial use);
- WILD: Wildlife habitat waters that support wildlife habitats; and
- RARE: Waters that support rare, threatened, or endangered species and associated habitats (a potential beneficial use).

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- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing).
- IND: Industrial activities that do not depend primarily on water quality (potential).
- PROC: Industrial activities that depend primarily on water quality (existing).
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing).

The quantitative analysis approach utilized in the Draft EIR is discussed on pages 5.4-37 and 5.4-38, and includes the use of hourly rainfall data measured at the nearest gage to the Project site for storm over 30 years. Event Mean Concentrations (EMCs) pollutant concentrations for proposed Project land uses are estimated from data collected in Los Angeles County where sufficient data existed for the applicable pollutants of concern. Pollutant loads were estimated as the product of the storm event runoff times the EMC, and individual storm event loads are added to estimate the annual load. The analysis considers the LID, hydrology, and hydromodification BMPs planned for the Project, including 28 retention and detention basins (see Draft EIR Exhibit 5.2-4, Proposed Infiltration Basin Locations) and distributed or parcel-specific LID measures (see Draft EIR Exhibit 5.4-2, Low Impact Development [LID] Drainage Areas with Project). The analysis is conservative because it does not take into account source-control BMPs (e.g., street sweeping) that would also improve water quality. The mean pollutant concentrations and loads in storm water are estimated following treatment, including capture by the LID, hydrology, and hydromodification BMPs for each storm event, taking into consideration the intensity of rainfall, duration of the storm, and duration between storm events. The analysis accounted for conditions when a treatment facility would be full and flows would bypass the facility as well as runoff volume reductions from the BMPs due to infiltration and evaporation. The analysis uses representative data for local conditions and infiltration parameters are based on soil hydrologic groups, soil texture classes, and the federal Natural Resource Conservation Service Soil Survey of the Project area. To conservatively reflect post-development conditions, soil compaction impacts were modeled for post-development open and landscaped areas assuming a 25 percent reduction in saturated hydraulic conductivity, or infiltration rate, from the pre-developed to post-developed conditions and impervious surfaces were modeled assuming no infiltration.

The results of the quantitative analysis for pollutants of concern are discussed on Draft EIR pages 5.4-57 to 5.4-69 and in Appendix 5.4-A, Centennial Project Water Quality Technical Report. The results of the qualitative analysis of pollutants of concern are discussed on Draft EIR pages 5.4-75 to 5.4-89 and in Appendix 5.4-A, Centennial Project Water Quality Technical Report. The Draft EIR analysis demonstrates that with the implementation of LID, hydrology, and hydromodification BMPs that meet the performance requirements of MMs 4-1 and 4-2, which will be incorporated into the Project Mitigation Monitoring and Reporting Program (MMRP) and enforceable by the County, none of the pollutants of concern would exceed applicable water quality objectives for all Los Angeles and Lahontan Basin Plan beneficial uses, including beneficial uses pertaining to wildlife and habitat under Project construction or operational (buildout) conditions. The comment does not identify any substantive issue or concern with the analysis of Project water quality impacts, including potential impacts to Basin Plan beneficial use designations pertaining to wildlife and habitat.

Surveys were conducted to document the biological resources within the Project impact area. Surveys to document biological resources for the Centennial Project included all areas, aquatic and riparian habitat included, on-site as well as off-site where direct impacts will occur. All drainages within this survey area, such as Oso Creek, were included within all applicable biological surveys such as vegetation mapping, jurisdictional delineations, and focused protocol surveys for special status riparian bird species. Drainages that are not on-

site and not within or immediately adjacent to an off-site impact area were not surveyed. Biological resources within unimpacted or indirectly impacted off-site areas are generally determined from regional data and aerial photographs as opposed to site specific surveys. In addition, as described above, the Draft EIR provides a detailed and thorough analysis of water quality impacts, including pollutants potentially associated with all proposed Project development and land uses to determine if they exhibited deleterious characteristics to flora and fauna. The analysis concludes that none of the pollutants of concern would exceed applicable water quality objectives for beneficial uses pertaining to wildlife and habitat under Project construction or operational (buildout) conditions. As a result, downstream aquatic and riparian habitat and associated wildlife would not be impacted to any measurable degree. As such, additional detailed off-site surveys within drainage features such as Gorman Creek or Quail Lake are unwarranted.

Response to Comment F.8-100:

The Draft EIR provides a thorough discussion of potential water quality impacts that could be associated with Project construction and development based on pollutants of concern that could be generated by proposed Project land uses, and demonstrates that, with the implementation of low impact development (LID), hydrology, and hydromodification best management practices (BMPs) required for the Project, these impacts will be mitigated to less than significant levels. The analysis of potential Project water quality impacts is discussed in Draft EIR Section 5.4, Water Quality, and Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report. Pertinent hydrological information for the water quality analysis in included in Section 5.2, Hydrology and Flood, Draft EIR Appendix 5.2-A, Centennial Master Plan Hydrology, and Appendix 5.2-B, Centennial Project Hydromodification Technical Report.

As discussed on pages 5.4-31 to 5.4-34 of the Draft EIR, the Project analysis of water quality impacts considers a representative range of potential pollutants of concern that could affect surface and groundwater from the construction and development of the Project based on the proposed land uses in the Project site. Pollutants of concern are analyzed in the Draft EIR if they exhibit one or more of the following deleterious characteristics: (a) current loadings or historic deposits of a pollutant impact the beneficial uses of a receiving water (i.e., the pollutant is subject to a Total Maximum Daily Load or the receiving water is listed as impaired for the pollutant pursuant to Section 303(d) of the Clean Water Act, even if the pollutant is unlikely to be generated by the Project); (b) elevated levels of a pollutant are found in sediments of a receiving water and/or have the potential to bioaccumulate in organisms therein; or (c) the detectable inputs of a pollutant at concentrations or loads would be considered potentially toxic to humans and/or flora and fauna (i.e., any pollutant expected to be generated by Project construction and/or operation at levels considered potentially toxic to humans and/or flora and fauna are considered pollutants of concern that are analyzed in the Draft EIR).

The Draft EIR analyzed pollutants of concern that are anticipated to be or could potentially be generated by the Project at concentrations that exhibit any of the these characteristics based on water quality data collected in Los Angeles County from land uses that are proposed

by the Project, consideration of the Los Angeles Regional Water Quality Control Board Basin Plan and the Lahontan Regional Water Quality Control Board Basin Plan beneficial uses and water quality objectives, California Toxic Rule (CTR) criteria, and current federal Clean Water Act Section 303(d) listings. The reasons for identifying certain pollutants of concern, the significance criteria used to analyze these constituents, and the rationales for not considering certain potential constituents in the analysis are discussed in detail in Section 5.4, Water Quality, and Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report. As discussed on pages 5.2-38 to 5.2-39, the Draft EIR water quality impact analysis quantitatively analyzes the following pollutants of concern for which there are sufficient flow composite sampling data in the Los Angeles County database:

- TSS (sediment)
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Post-development storm water runoff water quality impacts associated with the following pollutants of concern were qualitatively addressed due to the unavailability of flow composite sampling data based on literature information and professional judgment:

- Turbidity
- Pesticides
- Pathogens (bacteria, viruses, and protozoa)
- Petroleum hydrocarbons (oil and grease, PAHs)
- Trash and debris
- MBAS
- Toxicity
- Emerging Contaminants

As discussed on Draft EIR pages 5.4-21 to 5.4-23, the Draft EIR considered all of the applicable Lahontan Regional Water Quality Control Board Basin Plan and Los Angeles Regional Water Quality Control Board Basin Plan surface water and groundwater beneficial uses and water quality objectives.

The Draft EIR evaluates the Project's potential impact on the following surface water beneficial use designations identified in the Lahontan Regional Water Quality Control Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing or potential);

- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing or potential);
- GWR: Natural or artificial groundwater recharge (existing or potential);
- FRSH: Natural or artificial maintenance of surface water quantity or quality (e.g., salinity) (existing or potential);
- REC-1: Recreational bodily contact with water, where ingestion is reasonably possible (existing or potential);
- REC-2: Recreational activities involving contact in proximity to water, but not involving body contact (existing or potential);
- COMM: Commercial or recreational collection of fish or other organisms (existing or potential);
- COLD: Cold freshwater habitat to support cold water ecosystems;
- WILD: Wildlife habitat waters that support wildlife habitats;
- RARE: Waters that support rare, threatened, or endangered species and associated habitats; and
- SPWN: High quality aquatic habitats suitable for reproduction and early development of fish.

The Draft EIR evaluates the Project's potential impact on the following groundwater beneficial use designations identified in the Lahontan Regional Water Quality Control Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

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- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (intermittent and conditional [i.e., may be considered for exemptions at a later date]).

- AGR: Agricultural supply waters used for farming, horticulture, or ranching (intermittent).
- GWR: Natural and artificial groundwater recharge (intermittent).
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- WARM: Warm freshwater habitat to support warm water ecosystems (an intermittent beneficial use);
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The Draft EIR evaluates the Project's potential impact on following groundwater beneficial use designations identified in the Los Angeles Regional Water Quality Control Board Basin Plan, taking into consideration water quality standards established by the Basin Plan to protect such beneficial uses:

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- PROC: Industrial activities that depend primarily on water quality (existing).
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing).

The quantitative analysis approach utilized in the Draft EIR is discussed on pages 5.4-37 and 5.4-38, and includes the use of hourly rainfall data measured at the nearest gage to the Project site for storm over 30 years. Event Mean Concentrations (EMCs) pollutant concentrations for proposed Project land uses are estimated from data collected in Los Angeles County where sufficient data existed for the applicable pollutants of concern. Pollutant loads were estimated as the product of the storm event runoff times the EMC, and individual storm event loads are added to estimate the annual load. The analysis considers the LID, hydrology, and hydromodification BMPs planned for the Project, including 28 retention and detention basins (see Draft EIR Exhibit 5.2-4, Proposed Infiltration Basin Locations) and distributed or parcel-specific LID measures (see Draft EIR Exhibit 5.4-2, Low Impact Development [LID] Drainage Areas with Project). The analysis is conservative because it does not take into account source-control BMPs (e.g., street sweeping) that would also improve water quality. The mean pollutant concentrations and loads in storm water are estimated following treatment, including capture by the LID, hydrology, and hydromodification BMPs for each storm event, taking into consideration the intensity of rainfall, duration of the storm, and duration between storm events. The analysis accounted

for conditions when a treatment facility would be full and flows would bypass the facility as well as runoff volume reductions from the BMPs due to infiltration and evaporation. The analysis uses representative data for local conditions and infiltration parameters are based on soil hydrologic groups, soil texture classes, and the federal Natural Resource Conservation Service Soil Survey of the Project area. To conservatively reflect post-development conditions, soil compaction impacts were modeled for post-development open and landscaped areas assuming a 25 percent reduction in saturated hydraulic conductivity, or infiltration rate, from the pre-developed to post-developed conditions and impervious surfaces were modeled assuming no infiltration.

The results of the quantitative analysis for pollutants of concern are discussed on Draft EIR pages 5.4-57 to 5.4-69 and in Appendix 5.4-A, Centennial Project Water Quality Technical Report. The results of the qualitative analysis of pollutants of concern are discussed on Draft EIR pages 5.4-75 to 5.4-89 and in Appendix 5.4-A, Centennial Project Water Quality Technical Report. The Draft EIR analysis demonstrates that with the implementation of LID, hydrology, and hydromodification BMPs that meet the performance requirements of MMs 4-1 and 4-2, which will be incorporated into the Project MMRP and enforceable by the County, none of the pollutants of concern would exceed applicable water quality objectives for all applicable Lahontan and Los Angeles Basin Plan beneficial uses under Project construction or operational (buildout) conditions. The comment does not identify any substantive issue or concern with the analysis of Project water quality impacts, including potential impacts to Basin Plan beneficial use designation.

As discussed in Draft EIR Section 5.2.5 and in Section 5.7, Biological Resources (specifically, Threshold 7-3), and as shown in Exhibit 5.2-5, Receiving Channels of Concern and 100-Year Floodplain, the Project will avoid most of the watercourses and watershed areas in the Gorman Creek, Quail Lake, and Oso Creek Drainage Areas. Approximately 10 percent of the proposed development would occur west of the West Branch of the Aqueduct, and drainage impacts in this area would primarily affect Oso Creek tributaries flowing north from the southern side (i.e., the northerly face) of Oso Canyon. Drainage impacts in the Gorman Creek Drainage Area would largely be avoided. No watercourse impacts would occur in the Quail Lake Drainage Area. Potential hydrology and flood impacts to Quail Lake are discussed on Draft EIR page 5.2-25, which states that no receiving channels will receive Project development area runoff discharges under developed conditions in the Quail Lake drainage area, which includes the lake. Potential water quality impacts to Quail Lake are discussed on Draft EIR page 5.4-68, which states that no runoff from Project developed areas will occur in the Quail Lake watershed, which includes the lake. Consequently, no runoff from Project developed areas will flow to or occur within Quail Lake and the Quail Lake drainage and watershed, and the Project will not affect the hydrology, flood, or water quality conditions in the lake and the lake's watershed and drainage system. Drainage impacts in the Gorman Creek Drainage Area would also largely be avoided. As discussed in Draft EIR Section 5.4, Water Quality and in Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report, Section 7.6, the Project will also not cause significant water quality impacts to the Santa Clara River or to the Pyramid Lake and Piru Lake State Water Project reservoirs located to the south of the Project. Project area drainage amounts to 0.08 percent of the Santa

Clara River watershed, and water quality in the drainage is dominated by imported State Water Project supplies, including supplies stored in Pyramid Lake and Piru Lake.

Consequently, the Draft EIR provides a thorough discussion of potential water quality impacts to receiving waters related to Project construction and operational (buildout) conditions, considers and discloses the potential magnitude of these impacts for applicable pollutants of concern, and provides substantial evidence that Project impacts will be less than significant with mitigation. The Project will not drain into or affect Quail Lake, the Quail Lake drainage, or affect the water quality in any other lake, including the Pyramid Lake and Piru Lake State Water Project facilities located south of the Project.

Section 5.7 of Draft EIR, beginning on page 5.7-64, describes all special status plant and wildlife species occurring or potentially occurring within the Project area including within water features such as creeks and reservoirs. As noted in Tables 5.7-5 and 5.7-8 of the Draft EIR, several special status species may occur within riparian or aquatic habitat associated with Oso Creek and other similar habitat areas. While some of these species will be impacted by the proposed Project due to loss of habitat, these impacts have been determined to be less than significant or reduced to less than significant with implementation of mitigation and these species would not be impacted by changes in water quality resulting from the Project. As described above, the Draft EIR provides a detailed and thorough analysis of water quality impacts, including pollutants potentially associated with all proposed Project development and land uses to determine if they exhibited deleterious characteristics to flora and fauna. The analysis concludes that none of the pollutants of concern would exceed applicable water quality objectives for beneficial uses pertaining to wildlife and habitat under Project construction or operational (buildout) conditions. As a result, downstream aquatic and riparian habitat and associated special status plant and wildlife species would not be impacted to any measurable degree.

Response to Comment F.8-101:

This water quality analysis methodology used in the Draft EIR identifies and analyzes pollutants of concern that could occur from all Project land uses, including commercial and industrial land uses. The Draft EIR provides a thorough analysis of potential water quality impacts, including to wildlife, associated with Project construction and development and demonstrates that, with the implementation of low impact development (LID), hydrology, and hydromodification best management practices (BMPs) required for the Project, these impacts will be mitigated to less than significant levels. The analysis of potential Project water quality impacts is discussed in Draft EIR Section 5.4, Water Quality, and Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report. Pertinent hydrological information for the water quality analysis in included in Section 5.2, Hydrology and Flood, Draft EIR Appendix 5.2-A, Centennial Master Plan Hydrology, and Appendix 5.2-B, Centennial Project Hydromodification Technical Report.

As discussed on pages 5.4-31 to 5.4-34 of the Draft EIR, the Project analysis of water quality impacts considers a representative range of potential pollutants of concern that could affect surface and groundwater from the construction and development of the Project based on the

proposed land uses in the Project site. Pollutants of concern are analyzed in the Draft EIR if they exhibit one or more of the following deleterious characteristics: (a) current loadings or historic deposits of a pollutant impact the beneficial uses of a receiving water; (b) elevated levels of a pollutant are found in sediments of a receiving water and/or have the potential to bioaccumulate in organisms therein; or (c) the detectable inputs of a pollutant at concentrations or loads would be considered potentially toxic to humans and/or flora and fauna.

The Draft EIR analyzed pollutants of concern that are anticipated to be or could potentially be generated by the Project at concentrations that exhibit any of the these characteristics based on water quality data collected in Los Angeles County from land uses that are proposed by the Project, consideration of the Los Angeles Regional Water Quality Control Board Basin Plan and the Lahontan Regional Water Quality Control Board Basin Plan beneficial uses and water quality objectives, California Toxic Rule (CTR) criteria, and current federal Clean Water Act Section 303(d) listings. The reasons for identifying certain pollutants of concern, the significance criteria used to analyze these constituents, and the rationales for not considering certain potential constituents in the analysis are discussed in detail in Section 5.4, Water Quality, and Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report. Several pollutants of concern discussed in the analysis, such as Petroleum Hydrocarbons (Oil and Grease and PAHs), and Methylene blue activated substances (MBAS), are explicitly linked with industrial and/or commercial activity in the Draft EIR discussion (Draft EIR pages 5.4-34 to 5.4-35) Others, such as metals, trash and debris, and chloride, are commonly known to be generated by industrial and/or commercial land uses.

As discussed on pages 5.2-38 to 5.2-39, the Draft EIR water quality impact analysis quantitatively analyzes the following pollutants of concern that could be generated by proposed Project land uses, including commercial and industrial land uses, for which there are sufficient flow composite sampling data in the Los Angeles County database:

- TSS (sediment)
- Total Phosphorus
- Nitrate Nitrite-Nitrogen, Ammonia, and Total Nitrogen
- Total and Dissolved Copper
- Total Lead
- Total and Dissolved Zinc
- Chloride

Post-development storm water runoff water quality impacts associated with the following pollutants of concern that could be generated by proposed Project land uses, including commercial and industrial land uses, were qualitatively addressed due to the unavailability of flow composite sampling data based on literature information and professional judgment:

- Turbidity
- Pesticides
- Pathogens (bacteria, viruses, and protozoa)
- Petroleum hydrocarbons (oil and grease, PAHs)

- Trash and debris
- MBAS
- Toxicity
- Emerging Contaminants

As discussed on Draft EIR pages 5.4-21 to 5.4-23, the Draft EIR considered all of the applicable Lahontan Regional Water Quality Control Board Basin Plan and Los Angeles Regional Water Quality Control Board Basin Plan surface water and groundwater beneficial uses and water quality objectives.

The Draft EIR evaluates the Project's potential impact on the following surface water beneficial use designations identified in the Lahontan Regional Water Quality Control Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing or potential);
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing or potential);
- GWR: Natural or artificial groundwater recharge (existing or potential);
- FRSH: Natural or artificial maintenance of surface water quantity or quality (e.g., salinity) (existing or potential);
- REC-1: Recreational bodily contact with water, where ingestion is reasonably possible (existing or potential);
- REC-2: Recreational activities involving contact in proximity to water, but not involving body contact (existing or potential);
- COMM: Commercial or recreational collection of fish or other organisms (existing or potential).
- COLD: Cold freshwater habitat to support cold water ecosystems;
- WILD: Wildlife habitat waters that support wildlife habitats;
- RARE: Waters that support rare, threatened, or endangered species and associated habitats; and
- SPWN: High quality aquatic habitats suitable for reproduction and early development of fish.

The Draft EIR evaluates the Project's potential impact on the following groundwater beneficial use designations identified in the Lahontan Regional Water Quality Control Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing or potential).

- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing or potential).
- IND: Industrial activities that do not depend primarily on water quality (existing or potential).
- FRSH: Natural or artificial maintenance of surface water quantity or quality (e.g., salinity) (existing or potential).

The Draft EIR evaluates the Project's potential impact on the following surface water beneficial use designations identified in the Los Angeles Regional Water Quality Control Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (intermittent and conditional [i.e., may be considered for exemptions at a later date]).
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (intermittent).
- GWR: Natural and artificial groundwater recharge (intermittent).
- REC-1: Recreational bodily contact with water where ingestion is reasonably possible (intermittent).
- REC-2: Recreational activities involving contact in proximity to water (intermittent).
- WARM: Warm freshwater habitat to support warm water ecosystems (an intermittent beneficial use);
- COLD: Cold freshwater habitat to support cold water ecosystems (an intermittent beneficial use);
- WILD: Wildlife habitat waters that support wildlife habitats; and
- RARE: Waters that support rare, threatened, or endangered species and associated habitats (a potential beneficial use).

The Draft EIR evaluates the Project's potential impact on the following groundwater beneficial use designations identified in the Los Angeles Regional Water Quality Control Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing).
- IND: Industrial activities that do not depend primarily on water quality (potential).
- PROC: Industrial activities that depend primarily on water quality (existing).
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing).

The quantitative analysis approach utilized in the Draft EIR is discussed on pages 5.4-37 and 5.4-38, and includes the use of hourly rainfall data measured at the nearest gage to the Project site for storm over 30 years. Event Mean Concentrations (EMCs) pollutant concentrations for proposed Project land uses are estimated from data collected in Los Angeles County where sufficient data existed for the applicable pollutants of concern. Pollutant loads were estimated as the product of the storm event runoff times the EMC, and individual storm event loads are added to estimate the annual load. The analysis considers the LID, hydrology, and hydromodification BMPs planned for the Project, including 28 retention and detention basins (see Draft EIR Exhibit 5.2-4, Proposed Infiltration Basin Locations) and distributed or parcel-specific LID measures (see Draft EIR Exhibit 5.4-2, Low Impact Development [LID] Drainage Areas with Project). The analysis is conservative because it does not take into account source-control BMPs (e.g., street sweeping) that would also improve water quality. The mean pollutant concentrations and loads in storm water are estimated following treatment, including capture by the LID, hydrology, and hydromodification BMPs for each storm event, taking into consideration the intensity of rainfall, duration of the storm, and duration between storm events. The analysis accounted for conditions when a treatment facility would be full and flows would bypass the facility as well as runoff volume reductions from the BMPs due to infiltration and evaporation. The analysis uses representative data for local conditions and infiltration parameters are based on soil hydrologic groups, soil texture classes, and the federal Natural Resource Conservation Service Soil Survey of the Project area. To conservatively reflect post-development conditions, soil compaction impacts were modeled for post-development open and landscaped areas assuming a 25 percent reduction in saturated hydraulic conductivity, or infiltration rate, from the pre-developed to post-developed conditions and impervious surfaces were modeled assuming no infiltration.

The results of the quantitative analysis for pollutants of concern are discussed on Draft EIR pages 5.4-57 to 5.4-69 and in Appendix 5.4-A, Centennial Project Water Quality Technical Report. The results of the qualitative analysis of pollutants of concern are discussed on Draft EIR pages 5.4-75 to 5.4-89 and in Appendix 5.4-A, Centennial Project Water Quality Technical Report. The Draft EIR analysis demonstrates that with the implementation of LID, hydrology, and hydromodification BMPs that meet the performance requirements of MMs 4-1 and 4-2, which will be incorporated into the Project MMRP and enforceable by the County, none of the pollutants of concern would exceed applicable water quality objectives for all Lahontan and Los Angeles Basin Plan beneficial uses, including wildlife and habitat beneficial uses, under Project construction or operational (buildout) conditions. As discussed above, the analysis includes consideration of pollutants of concern that would be expected from commercial, industrial and other urban uses in the Project during construction and operations (buildout). Consequently, the Draft EIR analysis considers and discusses potential industrial and commercial land use water quality impacts as well as residential and other proposed land uses.

The case cited in the comment concerns an EIR prepared by the California Department of Food and Agriculture (DFA) for actions related to the eradication of the glassy-winged sharpshooter, an agricultural pest. One of the proposed actions was applying pesticides in any location statewide where the pest may be discovered. The EIR did not include an analysis

of the use of any pesticide in any specific location where spraying could occur, including near schools, sensitive receptors or other locations. The court found that the EIR was deficient because it contained no analysis of potential impacts in in the specific context of the areas where applications could occur.

As discussed on pages 5.4-77 to 5.4-78, the Draft EIR considers potential water quality impacts in the Project area and in offsite receiving waters, from: (a) legacy organochlorine pesticides including Chlordane, Dieldrin, DDT and Toxaphene; (b) organophosphate pesticides that largely replaced organochlorine pesticides, including diazinon and chlorpyrifos; (c) pyrethroid pesticides, which are a synthetic form of naturally occurring pyrethrins; and (d) fipronil and its related degradates (fipronil desulfinyl, fipronil sulfone, and fipronil sulfide). The analysis discloses the potential toxicity of these and other urban pesticides in relation to their degradation rates in water and sediments. The analysis states that most pesticides, including historical pesticides that may be present at the site, are relatively insoluble in water and tend to adsorb to the surfaces of sediment, which would be stabilized with development or, if eroded, would be settled or filtered out of the water column by the Project's regional and distributed LID BMPs required by MM 4-1 (see Draft EIR Exhibit 5.2-4, Proposed Infiltration Basin Locations and Draft EIR Exhibit 5.4-2, Low Impact Development [LID] Drainage Areas with Project). The discussion states that potential pesticide impacts will be further reduced by implementing an Integrated Pest Management (IPM) program consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California, Division of Agriculture and the Natural Resources Statewide Integrated Pest Management Program. The IPM program will prevent or suppress pest problems (i.e., insects and diseases) through a combination of techniques including using pest-resistant plants; biological controls; cultural practices; habitat modification; and limited use of pesticides with applicable IPM BMPs required by MM 4-2. The implementation of LID BMPs under MM 4-1 and IPM measures in accordance with MM 4-2 must be confirmed by the County as part of each tentative tract map application, and both mitigation measures will be incorporated into the Project MMRP and enforceable by the County.

Consequently, in contrast with the cited case, the Draft EIR analysis of potential pesticide impacts considers site-specific conditions, discloses site specific risks from a broad range of legacy and urban pesticides, and requires site-specific, enforceable mitigation measures to reduce the potential impacts to less than significant levels. The Draft EIR also requires that compliance with the site-specific LID BMPs and IPM measures be confirmed by the County prior to the approval of each tract map and be included and enforceable under the Project MMRP that must be adopted by the County under CEQA.

Response to Comment F.8-102:

The Draft EIR water quality analysis in Section 5.2 and in Appendix 5.2-A considers the low impact development (LID), hydrology, and hydromodification best management practices (BMPs) planned for the Project, including 28 retention and detention basins (see Draft EIR Exhibit 5.2-4, Proposed Infiltration Basin Locations) and distributed or parcel-specific LID measures (see Draft EIR Exhibit 5.4-2, Low Impact Development [LID] Drainage Areas with

Project). The analysis is conservative because it does not take into account source-control BMPs (e.g., street sweeping) that would also improve water quality. The LID, BMPs, and source controls that will achieve the water quality and hydromodification objectives (Draft EIR Section 5.4) discussed in the Draft EIR are also described in detail in Section 5 of Draft EIR Appendix 5.4-A, Centennial Master Plan Hydrology, and Appendix 5.4-B, Centennial Water Quality Technical Report. Draft EIR Sections 5.2 and 5.4 and Draft EIR Appendices 5.2-A, 5.4-A, and 5.4-B demonstrate that water quality and hydromodification control measures can be feasibly implemented throughout the Project in a manner that will protect all applicable surface and groundwater beneficial uses and meet all applicable surface water and groundwater quality objectives in the Los Angeles Regional Water Quality Control Board Basin Plan and the Lahontan Regional Water Quality Control Board Basin Plan.

MM 4-1 requires that the Project implement LID and water quality control BMPs that achieve the applicable Los Angeles County LID performance standards. These performance standards were used to design the LID and BMP controls identified in Draft EIR Sections 5.2 and 5.4 and Draft EIR Appendices 5.2-A, 5.4-A, and 5.4-B. Consequently, MM 4-1 requires that the Project implement LID and BMP controls will achieve the same water quality and hydromodification controls identified in the Draft EIR. In addition, MM 4-1 requires that compliance with the applicable Los Angeles County LID performance standards must be confirmed by the County as part of each tentative tract map application. MM 4-1 will also be incorporated into the Project MMRP and enforceable by the County. Consequently, pursuant to MM 4-1, the Project is subject to mandatory, enforceable LID and BMP control requirements that must meet applicable Los Angeles County LID performance standards. MM 4-1 also requires that the Project identify and demonstrate that specific LID and BMP controls meet the applicable Los Angeles County LID performance standards as part of the County review and approval process for each tract map. MM 4-1 thus imposes specific mitigation requirements that are consistent with the Draft EIR analysis and ensures that water quality protections will be implemented with each tract map that are at least as effective as those discussed in Draft EIR Sections 5.2 and 5.4 and Draft EIR Appendices 5.2-A, 5.4-A, and 5.4-B.

Response to Comment F.8-103:

The Draft EIR provides a detailed and thorough analysis of water quality impacts potentially associated with all proposed Project development and land uses, including to wildlife, in Section 5.4, Water Quality, and Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report. Pertinent hydrological information for the water quality analysis in included in Section 5.2, Hydrology and Flood, Draft EIR Appendix 5.2-A, Centennial Master Plan Hydrology, and Appendix 5.2-B, Centennial Project Hydromodification Technical Report. As discussed on pages 5.4-31 to 5.4-34 of the Draft EIR, the Project analysis of water quality impacts considered a representative range of potential pollutants of concern that could affect surface and groundwater from the construction and development of the Project based on the proposed land uses in the Project site. Pollutants of concern were analyzed in the Draft EIR if they exhibited one or more of the following deleterious characteristics: (a) current loadings or historic deposits of a pollutant impact the beneficial uses of a receiving water; (b) elevated levels of a pollutant are found in sediments of a receiving water and/or

have the potential to bioaccumulate in organisms therein; or (c) the detectable inputs of a pollutant at concentrations or loads would be considered potentially toxic to humans and/or flora and fauna.

The Draft EIR analyzed pollutants of concern that are anticipated to be or could potentially be generated by the Project at concentrations that exhibit any of the these characteristics based on water quality data collected in Los Angeles County from land uses that are proposed by the Project, consideration of the Los Angeles Regional Water Quality Control Board Basin Plan and the Lahontan Regional Water Quality Control Board Basin Plan beneficial uses and water quality objectives, California Toxic Rule (CTR) criteria, and current federal Clean Water Act Section 303(d) listings. The reasons for identifying certain pollutants of concern, the significance criteria used to analyze these constituents, and the rationales for not considering certain potential constituents in the analysis are discussed in detail in Section 5.4, Water Quality, and Draft EIR Appendix 5.4-A, Centennial Project Water Quality Technical Report. As discussed on pages 5.2-38 to 5.2-39, the Draft EIR water quality impact analysis quantitatively analyzes the following pollutants of concern for which there are sufficient flow composite sampling data in the Los Angeles County database:

- TSS (sediment)
- Total Phosphorus
- Nitrate Nitrite-Nitrogen, Ammonia, and Total Nitrogen
- Total and Dissolved Copper
- Total Lead
- Total and Dissolved Zinc
- Chloride

Post-development storm water runoff water quality impacts associated with the following pollutants of concern that could be generated by proposed Project land uses, including commercial and industrial land uses, were qualitatively addressed due to the unavailability of flow composite sampling data based on literature information and professional judgment:

- Turbidity
- Pesticides
- Pathogens (bacteria, viruses, and protozoa)
- Petroleum hydrocarbons (oil and grease, PAHs)
- Trash and debris
- MBAS
- Toxicity
- Emerging Contaminants

As discussed on Draft EIR pages 5.4-21 to 5.4-22, the Draft EIR considered all of the applicable Lahontan Regional Water Quality Control Board Basin Plan and Los Angeles Regional Water Quality Control Board Basin Plan beneficial uses and water quality objectives, including Basin Plan beneficial uses and water quality objectives that protect wildlife and wildlife habitat.

The Lahontan Regional Water Quality Control Board Basin Plan wildlife and habitat beneficial use designations considered in the Draft EIR include:

- COLD: Cold freshwater habitat to support cold water ecosystems;
- WILD: Wildlife habitat waters that support wildlife habitats;
- RARE: Waters that support rare, threatened, or endangered species and associated habitats; and
- SPWN: High quality aquatic habitats suitable for reproduction and early development of fish.

Los Angeles Regional Water Quality Control Board Basin Plan wildlife and habitat beneficial use designations considered in the Draft EIR include:

- WARM: Warm freshwater habitat to support warm water ecosystems (an intermittent beneficial use);
- COLD: Cold freshwater habitat to support cold water ecosystems (an intermittent beneficial use);
- WILD: Wildlife habitat waters that support wildlife habitats; and
- RARE: Waters that support rare, threatened, or endangered species and associated habitats (a potential beneficial use).

Other Lahontan Regional Water Quality Control Board Basin Plan surface water beneficial use designations considered in the Draft EIR include:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing or potential);
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing or potential);
- GWR: Natural or artificial groundwater recharge (existing or potential);
- FRSH: Natural or artificial maintenance of surface water quantity or quality (e.g., salinity) (existing or potential);
- REC-1: Recreational bodily contact with water, where ingestion is reasonably possible (existing or potential);
- REC-2: Recreational activities involving contact in proximity to water, but not involving body contact (existing or potential);
- COMM: Commercial or recreational collection of fish or other organisms (existing or potential).
- COLD: Cold freshwater habitat to support cold water ecosystems;
- WILD: Wildlife habitat waters that support wildlife habitats;

- RARE: Waters that support rare, threatened, or endangered species and associated habitats; and
- SPWN: High quality aquatic habitats suitable for reproduction and early development of fish.

The Draft EIR evaluates the Project's potential impact on the following groundwater beneficial use designations identified in the Lahontan Regional Water Quality Control Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing or potential).
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing or potential).
- IND: Industrial activities that do not depend primarily on water quality (existing or potential).
- FRSH: Natural or artificial maintenance of surface water quantity or quality (e.g., salinity) (existing or potential).

Other Los Angeles Regional Water Quality Control Board Basin Plan surface water beneficial use designations considered in the Draft EIR include:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (intermittent and conditional [i.e., may be considered for exemptions at a later date]).
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (intermittent).
- GWR: Natural and artificial groundwater recharge (intermittent).
- REC-1: Recreational bodily contact with water where ingestion is reasonably possible (intermittent).
- REC-2: Recreational activities involving contact in proximity to water (intermittent).
- WARM: Warm freshwater habitat to support warm water ecosystems (an intermittent beneficial use);
- COLD: Cold freshwater habitat to support cold water ecosystems (an intermittent beneficial use);
- WILD: Wildlife habitat waters that support wildlife habitats; and
- RARE: Waters that support rare, threatened, or endangered species and associated habitats (a potential beneficial use).

The Draft EIR evaluates the Project's potential impact on the following groundwater beneficial use designations identified in the Los Angeles Regional Water Quality Control

Board Basin Plan, taking into consideration the water quality standards established by the Basin Plan to protect such beneficial uses:

- MUN: Community, military, or individual water supply systems including, but not limited to, drinking water supply (existing).
- IND: Industrial activities that do not depend primarily on water quality (potential).
- PROC: Industrial activities that depend primarily on water quality (existing).
- AGR: Agricultural supply waters used for farming, horticulture, or ranching (existing).

The quantitative analysis approach utilized in the Draft EIR is discussed on pages 5.4-37 and 5.4-38, and includes the use of hourly rainfall data measured at the nearest gage to the Project site for storm over 30 years. Event Mean Concentrations (EMCs) pollutant concentrations for proposed Project land uses are estimated from data collected in Los Angeles County where sufficient data existed for the applicable pollutants of concern. Pollutant loads were estimated as the product of the storm event runoff times the EMC, and individual storm event loads are added to estimate the annual load. The analysis considers the LID, hydrology, and hydromodification BMPs planned for the Project, including 28 retention and detention basins (see Draft EIR Exhibit 5.2-4, Proposed Infiltration Basin Locations) and distributed or parcel-specific LID measures (see Draft EIR Exhibit 5.4-2, Low Impact Development [LID] Drainage Areas with Project). The analysis is conservative because it does not take into account source-control BMPs (e.g., street sweeping) that would also improve water quality. The mean pollutant concentrations and loads in storm water are estimated following treatment, including capture by the LID, hydrology, and hydromodification BMPs for each storm event, taking into consideration the intensity of rainfall, duration of the storm, and duration between storm events. The analysis accounted for conditions when a treatment facility would be full and flows would bypass the facility as well as runoff volume reductions from the BMPs due to infiltration and evaporation. The analysis uses representative data for local conditions and infiltration parameters are based on soil hydrologic groups, soil texture classes, and the federal Natural Resource Conservation Service Soil Survey of the Project area. To conservatively reflect post-development conditions, soil compaction impacts were modeled for post-development open and landscaped areas assuming a 25 percent reduction in saturated hydraulic conductivity, or infiltration rate, from the pre-developed to post-developed conditions and impervious surfaces were modeled assuming no infiltration.

The results of the quantitative analysis for pollutants of concern are discussed on Draft EIR pages 5.4-57 to 5.4-69 and in Appendix 5.4-A, Centennial Project Water Quality Technical Report. The results of the qualitative analysis of pollutants of concern are discussed on Draft EIR pages 5.4-75 to 5.4-89 and in Appendix 5.4-A, Centennial Project Water Quality Technical Report. The Draft EIR analysis demonstrates that with the implementation of LID, hydrology, and hydromodification BMPs that meet the performance requirements of MMs 2-1, 4-1, and 4-2, which will be incorporated into the Project MMRP and enforceable by the County, none of the pollutants of concern would exceed applicable water quality objectives for all Lahontan and Los Angeles Basin Plan beneficial uses, including wildlife and habitat beneficial uses, under Project construction or operational (buildout) conditions.

As discussed on pages 5.4-77 and 5.4-78, the Draft EIR considers potential water quality impacts in the Project area and in offsite receiving waters, from: (a) legacy organochlorine pesticides including Chlordane, Dieldrin, DDT and Toxaphene; (b) organophosphate pesticides that largely replaced organochlorine pesticides, including diazinon and chlorpyrifos; (c) pyrethroid pesticides, which are a synthetic form of naturally occurring pyrethrins; and (d) fipronil and its related degradates (fipronil desulfinyl, fipronil sulfone, and fipronil sulfide). The analysis discloses the potential toxicity of these and other urban pesticides in relation to their degradation rates in water and sediments. The analysis states that most pesticides, including historical pesticides that may be present at the site, are relatively insoluble in water and tend to adsorb to the surfaces of sediment, which would be stabilized with development or, if eroded, would be settled or filtered out of the water column by the Project's regional and distributed LID BMPs required by MM 4-1 (see Draft EIR Exhibit 5.2-4, Proposed Infiltration Basin Locations and Draft EIR Exhibit 5.4-2, Low Impact Development [LID] Drainage Areas with Project). The discussion states that potential pesticide impacts will be further reduced by implementing an Integrated Pest Management (IPM) program consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California, Division of Agriculture and the Natural Resources Statewide Integrated Pest Management Program. The IPM program will prevent or suppress pest problems (i.e., insects and diseases) through a combination of techniques including using pest-resistant plants; biological controls; cultural practices; habitat modification; and limited use of pesticides with applicable IPM BMPs required by MM 4-2. The implementation of LID BMPs under MM 4-1 and IPM measures in accordance with MM 4-2 must be confirmed by the County as part of each tentative tract map application, and both mitigation measures will be incorporated into the Project MMRP and enforceable by the County. Consequently, the Draft EIR provides a thorough analysis of water quality impacts related to Project construction and operations (buildout), including from potential urban use of and legacy pesticides, and that considers potential impacts to wildlife.

Section 5.7 of the Draft EIR provides an analysis of all Project impacts on biological resources on and adjacent to the site. The impact analysis includes both project construction as well as direct and indirect long-term impacts on biological resources associated with Project implementation such as the increased human activity described in Section 5.7.6. In addition, many of the impacts are considered significant and mitigation is required which specifically pertains to human activity such as MM 7-17 on pages 5.7-192 and 5.7-193.

In addition, as described above, the Draft EIR provides a detailed and thorough analysis of water quality impacts, including pollutants potentially associated with all proposed Project development and land uses to determine if they exhibited deleterious characteristics to flora and fauna. The analysis concludes that none of the pollutants of concern would exceed applicable water quality objectives for beneficial uses pertaining to wildlife and habitat under Project construction or operational (buildout) conditions. As a result, downstream aquatic and riparian habitat and associated wildlife would not be impacted to any measurable degree.

Response to Comment F.8-104:

This comment references a portion of MM 4-2 on Draft EIR page 5.4-30. The full mitigation measure is on Draft EIR pages 5.4-30 and 5.4-31. MM 4-2 requires that the Project implement an integrated pest management (IPM) and landscaping best management practices (BMPs) consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California, Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program (IPM Program). The IPM program is widely recognized as the leading authority for providing documentation and guidance for the implementation of pest management approaches in urban (and other) contexts that avoid and minimize the use of pesticides and other measures that could harm the environment and wildlife other than the target pests.

As discussed on Draft EIR page 4-81, and in Draft EIR Appendix 5.4-A, Centennial Water Quality Technical Report, Section 5.2.1, IPM is a strategy that focuses on long-term prevention or suppression of pest problems (i.e., insects and diseases) through a combination of techniques including using pest-resistant plants; biological controls; cultural practices; habitat modification; and the judicious use of pesticides according to treatment thresholds, when monitoring indicates pesticides are needed because pest populations exceed established thresholds. The integrated pest management and pesticide and fertilizer application guidelines established by the University of California, Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program are publicly available at http://www.ipm.ucdavis.edu/. As discussed in Draft EIR Appendix 5.4-A, the Project will implement the IPM guidelines by incorporating several requirements identified by the IPM Program, including (1) identifying the key decision IPM decisions makers, other key roles (such as the recordkeeping), and the IPM funding mechanisms; (2) identifying plant species and potential pests for these plant species; (3) identifying management strategies for each potential pest consistent with IPM guidelines, such as modifying landscaping to be less conducive to pest survival, using pest- resistant plant varieties, using mulch to suppress weeds, encouraging naturally occurring biological controls, educating the public to be more tolerant of pests, removing pests mechanically or with barriers and traps, developing a list of pesticides that are less toxic to the environment, and developing formulations that will control the pest if other methods are not successful; (4) monitoring to examine vegetation and surrounding areas for pests to evaluate trends and to identify when controls are needed; (5) establishing injury levels and action thresholds for each potential pest that is listed in the IPM; (6) describing cultural, mechanical, environmental, and biological pest control methods and pesticides authorized for use, including specific criteria for selecting pest management methods that are least disruptive to natural controls and least damaging to water quality, and procedures for evaluating the effectiveness of the control method; (7) describing soil assessment techniques, fertilizer types, application methods, and proper storage and handling of fertilizers; (8) incorporating pesticide safety; regulatory requirements; spill mitigation; groundwater and surface water protection measures associated with pesticide use; and pesticide applicator certifications, licenses, and training requirements; (9) describing low volume water approaches to landscape irrigation, the training to be provided to landscape crews that will focus on applying water only when needed to enhance plant root growth, managing irrigation to avoid conditions conducive to disease

development, and minimizing runoff containing pollutants; (10) identifying record keeping requirements; (11) identifying training requirements for pest management personnel; and (12) describing the methods to be used to evaluate the overall effectiveness of the IPM program and a schedule for reviewing the IPM to incorporate new technology.

MM 4-2 requires that compliance with the IPM guidelines and landscaping BMPs must be confirmed in a landscaping plan submitted to the County during the review and approval process for each tract map application. Consistent with the IPM Program guidelines, the plan must address:

- Pest identification.
- Practices to prevent pest incidence and reduce pest buildup.
- Monitoring requirements to examine vegetation and surrounding areas for pests; to evaluate trends; and to identify when controls are needed.
- Establishment of action thresholds that trigger control actions.
- Pest-control methods (cultural, mechanical, environmental, biological) and appropriate pesticides.
- Pesticide management controls including those that comply with safety requirements (e.g., Material Safety Data Sheets, precautionary statements, protective equipment); regulatory requirements; spill mitigation measures; groundwater and surface water protection measures associated with pesticide use; and pesticide applicator certifications, licenses, and training (i.e., all pesticide applicators must be certified by the California Department of Pesticide Regulation).
- Fertilizer management tasks including those for soil assessment, fertilizer types, application methods, and storage and handling.

To further clarify these requirements, the first paragraph of MM 4-2 is hereby modified to read as follows:

> The Project shall implement integrated pest management (IPM) and landscaping best management practices (BMPs) consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program <u>which are available online at http://www.ipm.ucdavis.edu/</u>. <u>The integrated pest management program will be provided to the County in association with the Landscape Plan submitted to the County with each tentative tract map.</u> The IPM and landscaping BMPs shall be confirmed in a Landscaping Plan submitted to the County during the review and approval process for each tract map application. The BMPs shall include a Planting Plan that is consistent with the plant water use requirements of Section 3.~~3~~<u>4</u> of the Centennial Specific Plan; with procedures for removing non- native vegetation and planting native vegetation; with fertilizer guidelines; and with the IPM approach for

> preventing or suppressing pest problems (i.e., insects and diseases). This shall be done through a combination of techniques including using pest-resistant plants; using biological controls; incorporating cultural practices; including habitat modification; and judiciously using pesticides. The IPM and landscaping BMPs shall, in addition to identifying IMP and landscaping BMP management and funding roles and responsibilities, monitoring, training, and timely IPM and BMP program review requirements to incorporate new technologies that may become available, address the following:

MM 4-2 identifies IPM requirements that have been developed by recognized pest management experts affiliated with the University of California, Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program and requires that the Project demonstrate compliance with IPM requirements during the County review and approval process for each Project tract map. MM 4-2 will also be incorporated into the Project MMRP and enforceable by the County. Consequently, the Project is subject to mandatory, enforceable IPM compliance requirements that implement the IPM guidelines developed by the University of California, Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program.

Response to Comment F.8-105:

This comment references a portion of MM 4-2 on Draft EIR page 5.4-30. The full mitigation measure is on Draft EIR pages 5.4-30 and 5.4-31. MM 4-2 requires that the Project implement an integrated pest management (IPM) and landscaping best management practices (BMPs) consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California, Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program (IPM Program). The IPM program is widely recognized as the leading authority for providing documentation and guidance for the implementation of pest management approaches in urban (and other) contexts that avoid and minimize the use of pesticides and other measures that could harm the environment and wildlife other than the target pests.

As discussed on Draft EIR page 4-81, and in Draft EIR Appendix 5.4-A, Centennial Water Quality Technical Report, Section 5.2.1, IPM is a strategy that focuses on long-term prevention or suppression of pest problems (i.e., insects and diseases) through a combination of techniques including using pest-resistant plants; biological controls; cultural practices; habitat modification; and the judicious use of pesticides according to treatment thresholds, when monitoring indicates pesticides are needed because pest populations exceed established thresholds. The integrated pest management and pesticide and fertilizer application guidelines established by the University of California, Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program are publicly available at http://www.ipm.ucdavis.edu/. As discussed in Draft EIR Appendix 5.4-A, the Project will implement the IPM guidelines by incorporating several requirements identified by the IPM Program, including (1) identifying the key decision IPM decisions makers, other key roles (such as the recordkeeping), and the IPM funding mechanisms; (2) identifying plant species and potential pests for these plant species; (3) identifying management strategies for each

potential pest consistent with IPM guidelines, such as modifying landscaping to be less conducive to pest survival, using pest- resistant plant varieties, using mulch to suppress weeds, encouraging naturally occurring biological controls, educating the public to be more tolerant of pests, removing pests mechanically or with barriers and traps, developing a list of pesticides that are less toxic to the environment, and developing formulations that will control the pest if other methods are not successful; (4) monitoring to examine vegetation and surrounding areas for pests to evaluate trends and to identify when controls are needed; (5) establishing injury levels and action thresholds for each potential pest that is listed in the IPM; (6) describing cultural, mechanical, environmental, and biological pest control methods and pesticides authorized for use, including specific criteria for selecting pest management methods that are least disruptive to natural controls and least damaging to water quality, and procedures for evaluating the effectiveness of the control method; (7) describing soil assessment techniques, fertilizer types, application methods, and proper storage and handling of fertilizers; (8) incorporating pesticide safety; regulatory requirements; spill mitigation; groundwater and surface water protection measures associated with pesticide use; and pesticide applicator certifications, licenses, and training requirements; (9) describing low volume water approaches to landscape irrigation, the training to be provided to landscape crews that will focus on applying water only when needed to enhance plant root growth, managing irrigation to avoid conditions conducive to disease development, and minimizing runoff containing pollutants; (10) identifying record keeping requirements; (11) identifying training requirements for pest management personnel; and (12) describing the methods to be used to evaluate the overall effectiveness of the IPM program and a schedule for reviewing the IPM to incorporate new technology.

MM 4-2 requires that compliance with the IPM guidelines and landscaping BMPs must be confirmed in a landscaping plan submitted to the County during the review and approval process for each tract map application. Consistent with the IPM Program guidelines, the plan must address:

- Pest identification.
- Practices to prevent pest incidence and reduce pest buildup.
- Monitoring requirements to examine vegetation and surrounding areas for pests; to evaluate trends; and to identify when controls are needed.
- Establishment of action thresholds that trigger control actions.
- Pest-control methods (cultural, mechanical, environmental, biological) and appropriate pesticides.
- Pesticide management controls including those that comply with safety requirements (e.g., Material Safety Data Sheets, precautionary statements, protective equipment); regulatory requirements; spill mitigation measures; groundwater and surface water protection measures associated with pesticide use; and pesticide applicator certifications, licenses, and training (i.e., all pesticide applicators must be certified by the California Department of Pesticide Regulation).

- Fertilizer management tasks including those for soil assessment, fertilizer types, application methods, and storage and handling.

To further clarify these requirements, the first paragraph of MM 4-2 is hereby modified to read as follows:

> The Project shall implement integrated pest management (IPM) and landscaping best management practices (BMPs) consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program which are available online at http://www.ipm.ucdavis.edu/. The IPM and landscaping BMPs shall be confirmed in a Landscaping Plan submitted to the County during the review and approval process for each tract map application. The BMPs shall include a Planting Plan that is consistent with the plant water use requirements of Section 3.~~3~~4 of the Centennial Specific Plan; with procedures for removing non- native vegetation and planting native vegetation; with fertilizer guidelines; and with the IPM approach for preventing or suppressing pest problems (i.e., insects and diseases). This shall be done through a combination of techniques including using pest-resistant plants; using biological controls; incorporating cultural practices; including habitat modification; and judiciously using pesticides. The IPM and landscaping BMPs shall, in addition to identifying IMP and landscaping BMP management and funding roles and responsibilities, monitoring, training, and timely IPM and BMP program review requirements to incorporate new technologies that may become available, address the following:

MM 4-2 identifies IPM requirements that have been developed by recognized pest management experts affiliated with the University of California, Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program and requires that the Project demonstrate compliance with IPM requirements during the County review and approval process for each Project tract map. MM 4-2 will also be incorporated into the Project MMRP and enforceable by the County. Consequently, the Project is subject to mandatory, enforceable IPM compliance requirements that implement the IPM guidelines developed by the University of California, Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program.

As discussed on Draft EIR page 5.7-48, the California tree frog, California toad, and the black-bellied salamander are common species and not special status or "sensitive" species as stated in the comment. In addition, it is widely recognized that one of the basic objectives of the IMP Program is to develop effective pest management methods that minimize environmental harm and protect wildlife and wildlife habitats The University of California, Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program specifically states that the IPM is a process to "solve pest problems while minimizing risks to people and the environment" and to address pest control "in a manner that minimizes risks

to human health, beneficial and nontarget organisms, and the environment".[1732] The fact that the IPM Program includes the protection of sensitive wildlife and habitats has also been recognized by several other State and federal environmental protection and wildlife agencies and programs, including the -U.S. Environmental Protection Agency (EPA); the University of California, Division of Agriculture and Natural Resources; the U.S. Fish and Wildlife Service; and the Natural Resources Conservation Service or the U.S. Department of Agriculture. The table below provides a summary of statements and applicable online sources published by these agencies and institutions.

Representative Agency and Institutional References to Integrated Pest Management and Environmental Protection Objectives

Statement	Reference
IPM is an effective and environmentally-sensitive approach that offers a wide variety of tools to reduce contact with pests and exposure to pesticides. Knowledgeable, proactive stakeholders can enable a community to prevent or significantly reduce pollution from unnecessary pesticide use.	Introduction to Integrated Pest Management, USEPA. https://www.epa.gov/managing-pests-schools/introduction-integrated-pest-management#main-content
IPM is an ecosystem-based strategy that focuses on long-term prevention of pests or their damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, and use of resistant varieties. Pesticides are used only after monitoring indicates they are needed according to established guidelines, and treatments are made with the goal of removing only the target organism. Pest control materials are selected and applied in a manner that minimizes risks to human health, beneficial and non-target organisms, and the environment.	University of California Division of Agriculture and Natural Resources Publication 8093, 2003. Establishing Integrated Pest Management Policies and Programs: A Guide for Public Agencies. http://anrcatalog.ucanr.edu/pdf/8093.pdf
IPM considers if there are sensitive resources present at some of the sites, such as rare or listed species, these resources and their locations are discussed and low-risk treatment options are selected to protect the sensitive species or sites. For example, if an infestation is present on lands deemed "high risk potential" for groundwater contamination, an herbicide treatment that might contaminate groundwater resources would be inappropriate. Similarly, a broad-spectrum herbicide would be inappropriate unless it was used as a spot treatment only on the targeted pest and precautions are identified to reduce drift, leaching, and runoff to nearby sensitive areas. The IPM process includes comparing all chemical treatments to endangered species and ground/surface water sensitivity analysis models to ensure that herbicide applications pose a minimal risk to these biologically sensitive areas.	US Fish and Wildlife Service, Integrated Pest Management Plan, 2004-2009, Devils Lake Wetland Management Complex, Devils Lake, North Dakota. No date. https://www.fws.gov/invasives/staffTrainingModule/pdfs/planning/IPM%20PLAN%20Jim%20Revised3-22-f05%20Times%20Roman.pdf
IPM practices have been developed to improve pest control while minimizing impacts on beneficial species, such as pollinators. Integrated pest management protects pollinators by combining biological, cultural, physical, and chemical tools in a way that minimizes economic, health, and environmental risks. It is a long-	US Fish and Wildlife Service IPM Fact Sheet, October 2006. https://www.fws.gov/pollinators/pdfs/IPMpol.pdf

[1732] University of California, Division of Agriculture and Natural Resources (UCANR). 2017. What is Integrated Pest Management (IPM)? UCANR: CA. http://www2.ipm.ucanr.edu/WhatIsIPM/.

Statement	Reference
standing, science-based, decision-making process that coordinates the use of pest biology, environmental information, and available technology to prevent unacceptable levels of pest damage by the most economical means, while posing the least possible risk to people, property, resources, and the environment, including pollinators. IPM provides an effective strategy for managing outdoor (backyards, golf courses, natural areas) and indoor (homes and businesses) pests. IPM serves as an umbrella to provide an effective, all encompassing, minimal-risk approach to protect wildlife, wildlife habitats, and people from pests.	
Integrated Pest Management (IPM) ideally combines biological and cultural controls with limited pesticide use to keep pest populations below economically damaging levels, prevent future pest problems, and minimize the harmful effects of pesticides on humans and natural resources, including wildlife. IPM limits pesticide use, which affects non-target species such as beneficial insects and wildlife. Estimates of wild birds killed in the United States every year by exposure to legally applied pesticides range in the tens of millions. Aquatic invertebrates, fish, amphibians, mammals, and others are also at risk. Insects are a major vehicle for pollination in orchards and vineyards, but their populations decrease after pesticide misuse. Herbicides can reduce or eliminate potential wildlife food and cover plants. Use of insecticides can reduce beneficial invertebrate populations that help control pests and are important food sources to many wildlife species. By using insecticides to address pest problems only where other measures fail to achieve the desired level of control, IPM seeks to minimize the negative effects of pesticide use on wildlife and other natural resources.	Natural Resources Conservation Service, U.S. Department of Agriculture, IPM and Wildlife Fact Sheet, April 2004. https://policy.nrcs.usda.gov/OpenNonWebContent.aspx?content=18487.wba

Response to Comment F.8-106:

The comment correctly states that the Project includes the construction of many detention and retention basins as part of the drainage plan. However, all of the Project basins are designed to attenuate flows during high flow events only with drawdown immediately thereafter. As a result, ponded water is not expected to persist for more than a few days on average and not more than a week for a major precipitation event. Pertinent hydrological information is included on pages 5.2-48 and 5.2-49 of Section 5.2, Hydrology and Flood, of the Draft EIR as well as generally in Appendix 5.2-A, Centennial Master Plan Hydrology, and Appendix 5.2-B, Centennial Project Hydromodification Technical Report. The American bullfrog (*Lithobates catesbeianus*), is an invasive species in California and is known to be harmful to many native wildlife species as noted in the comment. However, the habitat requirements for this species include year-round permanent pools. The limited inundation period of the basins created by the Project is not sufficient to represent suitable bullfrog habitat and would not attract or harbor this species.

Response to Comment F.8-107:

The cited statements about habitat destruction are noted and were considered when preparing the Draft EIR. Section 5.7.6, Environmental Impacts, includes an in-depth analysis of impacts to biological resources such as: special status plants,[1733] wildlife,[1734] and vegetation;[1735] wildlife movement;[1736] and jurisdictional resources,[1737] among others. Various mitigation measures, including the dedication of thousands of acres of open space to be preserved and managed in perpetuity are included in Section 5.7.7, Mitigation Measures, in the Draft EIR to reduce impacts to these biological resources to a less than significant level. Cumulatively considerable significant impacts are acknowledged for the biological issues of native perennial grasslands and regional wildlife movement, as discussed on pages 7-15 through 7-17 in Section 7.0, Cumulative Impacts, of the Draft EIR.

Response to Comment F.8-108:

The Commenter's opinions regarding habitat loss and use by future species is noted. The Draft EIR includes an assessment of all species at the project and cumulative impact levels. The Draft EIR conclusion that habitat loss is not an adverse impact on wildlife resources at a project or cumulative level[1738] is consistent with the independent judgement of the scientists and representatives of the six leading environmental groups that signed the Tejon Ranch Land Use and Conservation Plan, as described in response to Comment F.3-12 above. The Antelope Valley Area Plan (AVAP) concentrates development within designated Economic Opportunity Areas (including the West EOA location of the Project site), which the AVAP EIR concludes is environmentally superior to the development pattern allowed under the former Town & Country Area Plan in relation to multiple environmental resource considerations, including reduced impacts to biological resources.[1739]

As stated in response to Comment F.8-107, based on State CEQA Guidelines, the Draft EIR analyzes and mitigates potentially significant indirect impacts (such as light and noise) to a less than significant level (MMs 7-15 through 7-19,[1740] MM 11-3,[1741] MM 13-2,[1742] and MM 13-6[1743]). As discussed in Section 5.2, Hydrology and Flood, and Section 5.4, Water Quality, regional and distributed water quality treatment measures (e.g. regional detention and retention basins and parcel-specific measures) will meet County Low Impact

1733 DRP 2017, pp. 5.7-142 to -145
1734 *Id.,* pp. 5.7-145 to -153
1735 *Id.,* pp. 5.7-155 to -162, -171 and -172
1736 *Id.,* pp. 5.7-164 to -170
1737 *Id.,* pp. 5.7-162 to -164
1738 *Id.,* pp. 5.7-145 to -153, 7-16
1739 DRP 2014a, Section 7; DRP 2014b, Response A4, Response to comments from Ileene Anderson, Center for Biological Diversity
1740 DRP 2017, pp. 5.7-166 to -170, -191 to -194
1741 *Id.,* p. 5.11-79
1742 *Id.,* pp. 5.13-29 and -30
1743 *Id.,* p. 5.13-31

Development (LID) standards for new development and will provide sufficient treatment capacity to reduce potential surface and ground water quality (MM 2-1[1744] and MM 4-1[1745]).

Section 5.7.6, Environmental Impacts, includes an analysis of direct impacts. Regarding pollution in the form of pesticides and rodenticides, MM 4-2 in the Draft EIR will be modified to prohibit the use of rodenticides containing anticoagulants on the Project site or Mitigation Preserve lands. With this prohibition, the other suggestions in the comment are not required. The following text will be added as the seventh bullet (last bullet) to MM 4-2 in Section 5.4, Water Quality:

- <u>All rodenticides containing anticoagulants shall be prohibited from use on the Project site or Mitigation Preserve lands. The probation shall be clearly described and distributed to home buyers through their home purchase contract and CC&Rs.</u>

Regarding the spread of non-native and invasive species PDF 7-8 described on page 5.7-140 of the Draft EIR requires the preparation and update of a list of invasive plants species to be prohibited from use within the Project site, to be distributed to residents. If these species are on the list, they will be prohibited from use on the Project site.

Regarding habitat fragmentation and loss of mobility due to fencing; species expected to utilize the internal open space areas following Project buildout are expected to consist predominantly of common urban and suburban adapted species. These species are able to persist in these environments regardless of typical fencing and such barriers by using streets and green space areas. In addition, the Project has been designed to include are green space connections between undeveloped open space areas where feasible resulting in increased mobility for such species. The Project only fragments the natural open space areas within the development footprint, and these remaining pockets of open space/parkland within the footprint are not essential for the persistence of regional native wildlife populations. On the other hand, the Mitigation Preserve provides for a very large degree of connectivity and prevents future fragmentation through long-term dedication. The Project's impact on wildlife movement due to changes in mobility and habitat fragmentation is considered less than significant accordingly.[1746]

Various mitigation measures, including the dedication of thousands of acres of open space to be preserved and managed in perpetuity, are included in Section 5.7.7, Mitigation Measures, in the Draft EIR[1747] to reduce impacts to biological resources to a less than significant level. Cumulatively considerable significant impacts are acknowledged for the biological issues of native perennial grasslands and regional wildlife movement, as discussed in Section 7.0, Cumulative impacts of the Draft EIR.

[1744] *Id.,* p. 5.2-49
[1745] *Id.,* p. 5.4-90
[1746] *Id.,* p. 5.7-166
[1747] *Id.,* pp. 5.7-173 to -194

Response to Comment F.8-109:

The Commenter's opinion about urban infill projects is noted. Regarding corridors, as discussed on pages 5.7-63 and 5.7-64 of the Draft EIR, Oso Canyon and its many tributaries west of the Aqueduct and the east-west-oriented drainages that are located east of the Aqueduct are undoubtedly used by some animals as local travel paths as they move across their home range areas that include the Project site; however, the Aqueduct effectively serves to block east-west movement on the site for most ground-dwelling wildlife. Limited opportunities for wildlife to cross the Aqueduct have been identified at a few locations, but wildlife movement across that formidable barrier is expected to be a rare event. Because of the presence of cover and canopy provided by trees and shrubs, and because of the availability of seasonal water, the drainage area immediately north of State Route 138 (SR-138) and east of the Aqueduct on the Project site can serve as a valuable foraging resource area. Most wildlife using this area likely access it for water and/or to forage by crossing SR-138 from the more vegetated upland areas to the south of SR-138. Because individuals of many of the larger wildlife species in the region tend not to cross large expanses with sparse shrub cover (typical of the majority of the Project site), the central and eastern portions of the Project site are not likely to be used by the larger species to disperse between and within the regional open space areas in the site vicinity. The Project site does provide unobstructed local movement opportunities for small animals and aerially dispersing plants and animals that reside in the area. In addition, the Project design has incorporated undercrossing to facilitate local movement across SR-138. In addition, PDF 7-7 on page 5.7-139 of the Draft EIR requires the applicant to explore locating a wildlife-friendly crossing across the Aqueduct with the California Department of Water Resources. The ideal location for such a crossing would be adjacent to Quail Lake or adjacent to the new bridge proposed across the Aqueduct. Final design of any such crossing shall be reviewed and approved by Los Angeles County. Lastly, MM-14, described on page 5.7-190 and 5.7-191, sets forth the specific requirements for the undercrossing located where the SR-138 crosses the Project's western border near the current intersection with Cement Plant and requires an open space buffer near the bridge of the aqueduct for the Cement Plant Road and other areas to allow for greater wildlife mobility.

As mentioned in MM 7-3 on page 5.7-177 and MM 7-20 on page 5.7-194, Project fencing requirements are temporary and used to prevent wildlife entry into an area for their protection during a construction or land preparation period then removed. Also, the Project's fencing requirements shall be consistent with the Antelope Valley Area Plan (AVAP) biological resources policies. As listed on page 5.7-9, Policy COS 4.7 of the AVAP, where fencing is necessary for privacy or safety, require appropriate development standards that maximize opportunities for wildlife movement. Please also see response to Comment F.8-108. In addition, in an effort to minimize impacts of fencing, MM 7-15 shall be modified to add an additional paragraph to the end as follows:

> <u>All vertical open pipes used for fence posts, property line stakes, signs, roof veneration, chimneys, vault toilets, and similar structures and metal fence stakes used on the Project shall be capped. Capping can be accomplished</u>

> using bolts or other materials to avoid raptor talons becoming entrapped within the bolt holes of metal fence stakes.

In addition, the first sentence of MM 7-4 on page 5.7-177 is hereby modified as follows:

> All open space preservation areas adjacent to active construction sites shall be denoted with wildlife-friendly fencing installed and maintained during construction to ensure that construction activities remain within the development footprint.

The development areas of the Project site have been selected for this use consistent with other regional planning efforts. As described on page 5.7-16 of the Draft EIR, the Tejon Ranch Company (TRC) entered into a Conservation and Land Use Agreement (TRCRWA) with Audubon California, the Endangered Habitats League, the Natural Resources Defense Council, the Planning and Conservation League, the Sierra Club (Resource Groups), and the then newly formed, independent non-profit Tejon Ranch Conservancy (Conservancy). The TRCRWA covers the Centennial Project site and the remainder of Tejon Ranch (Ranch). The TRCRWA allows TRC and its development partners to pursue approvals from permitting agencies to develop portions of the Ranch, including the Project site, while providing for the designation and permanent protection of approximately 145,000 acres of contiguous open space areas immediately north of the Project site, to protect the biological resources and wildlife connectivity of the 270,000-acre Ranch. The TRCRWA also established options for the dedication or sale of approximately 62,000 acres in five additional areas of the Ranch for further open space preservation. In addition, 33,000 acres of designated open space within the development areas have been preserved. Collectively, these open space dedication and acquisition areas comprise approximately 240,000 acres, or approximately 90 percent of the 270,000-acre Ranch.

In addition, the TUMSHCP ensures the persistence of covered species, including sustaining viable populations of those species, providing for (within property dispersal) and protecting current opportunities for wildlife movement beyond the Ranch by preserving existing landscape linkages. Lands to be conserved as part of the TUMSHCP are adjacent to other lands within Tejon Ranch ownership and are also slated to be protected as part of the TRCRWA. The sum of these interconnected open space commitments, development restrictions, and the measures is a conservation commitment that is, by design, consistent with conservation biology principles calling for large, interconnected blocks of habitat that support the life history requirements of Covered Species and other resident wildlife. The TUMSHCP, if fully implemented, will sustain crucial landscape linkages across cismontane Southern California.

The TUMSHCP will be a major contributor to ensuring the viability of the Tehachapi Landscape linkage into the future. Through the various conditions and measures stipulated by the TUMSHCP for the various covered species, habitat for these and many additional species will be preserved and enhanced, which will promote healthy plant and wildlife communities throughout the region. Although the focus of the TUMSHCP is on the California condor and other species of the montane upland communities, many of the same species

occur in the foothills and lowland areas as well, including the Project site. These species will benefit from the TUMSHCP, in addition to the Centennial Mitigation Preserve program described in the Draft EIR.

Lastly, the Project design is consistent with the AVAP inclusive of open space designations, SEA protection, and preservation of habitat linkages.[1748] The AVAP is a community-based plan that is a subset of the County of Los Angeles General Plan, which includes the Project area. The AVAP EIR provides an analysis of all potential, reasonably foreseeable environmental impacts related to the implementation of the AVAP "to indicate possible ways to reduce or avoid environmental damage and to identify alternatives" to the AVAP.[1749] Additionally, the AVAP EIR discloses "significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present and reasonably foreseeable future projects."[1750] The development areas of the Project, as required, fall within the AVAP designated development areas.

Also note, regarding use of toxic pesticides and herbicides, MM 4-2 in the Draft EIR will be modified to prohibit the use of rodenticides containing anticoagulants on the Project site or Mitigation Preserve lands.[1751] The following text will be added as the seventh bullet (last bullet) to MM 4-2 in Section 5.4, Water Quality:

- <u>All rodenticides containing anticoagulants shall be prohibited from use on the Project site or Mitigation Preserve lands. The probation shall be clearly described and distributed to home buyers through their home purchase contract and CC&Rs.</u>

Furthermore, the Draft EIR includes PDF 4-2 and MM 4-2 in Section 5.4, Water Quality, which require that the Project implement an Integrated Pest Management (IPM) program consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California, Division of Agriculture and the Natural Resources Statewide Integrated Pest Management Program. The IPM program must prevent or suppress pest problems (i.e., insects and diseases) through a combination of techniques including using pest-resistant plants; biological controls; cultural practices; habitat modification; and judicious use of pesticides. Pesticide management BMPs will be implemented to promote safety (e.g., Material Safety Data Sheets, precautionary statements, protective equipment); compliance with regulatory requirements; spill mitigation; groundwater and surface water protection measures associated with pesticide use; and pesticide applicator certifications, licenses, and training (i.e., all pesticide applicators must be certified by the California Department of Pesticide Regulation).[1752] MM 4-2 provides more than guidelines for development of the IPM; it sets forth a performance standard that requires prevention or suppression of pest problems through a combination of techniques

[1748] DRP 2017, Table 5.8-1, pp. 5.8-23 to -70
[1749] DRP 2014, p. 2-1
[1750] *Ibid.*
[1751] DRP 2017, p. 5.4-90
[1752] *Id.,* pp. 5.4-30, -90

described above.[1753] Additionally, the Landscaping Plan, which includes the IPM and landscaping BMPs, must be submitted to the County for review and approval for each tract map.[1754]

Response to Comment F.8-110:

Although there is high biological value on portions of the Project site, the majority of the site has been heavily grazed by cattle for many years, which has led to a relatively pervasive invasion of non-native, noxious weeds such as shortpod mustard (*Hirschfeldia incana*).[1755] The Commenter's opinion that the site should not be developed is noted. In addition, the statement that the Project site provides crucial linkages for imperiled terrestrial animals and avian species, is not supported by the results of expert assessment of the Project site. Please see pages 5.7-50 through 5.7-64 and pages 5.7-164 through 5.7-170 of the Draft EIR for an in-depth and adequate discussion of wildlife movement, which includes post-Project impact considerations, connectivity of different guilds, and a complete evaluation on the Project's impacts on wildlife movement. Various regional wildlife studies have been conducted on the Project site (see Table 5.7-2 in Section 5.7-3, Environmental Setting). The conclusion of these studies has been that the sparse vegetation occurring on the Project site, coupled with the existing barriers of the California Aqueduct (both West Branch and East Branch) and Interstate 5, is not favorable for wildlife movement across the site as part of regional migration and local movement. Please note that considerable consideration is given to major movement deterrents in the Project area, including the SR-138 and the California aqueduct, due to their substantial potential to prevent movement of some wildlife. Accordingly, passage points (some of which are bridges) are discussed at length accordingly. SEA 17 is widely recognized as a crucial linkage area for the region and contains many undisturbed habitats. The Project has been designed to avoid direct impacts to SEA 17 completely (see Exhibit 4-11 in Section 4.0, Project Description). Also, see response to Comment F.8-109 for discussion of the Project's consistency with regional planning efforts including the TRCRWA, TUMSHCP, and the AVAP.

Response to Comment F.8-111:

The comment expresses an opinion about the Project. The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. However, because the comment does not address or question the content of the Draft EIR, no further response is required.

Response to Comment F.8-112:

With respect to the biological importance of Tejon Ranch and the Project site and preservation of contiguous lands, see response to Comment F.7-22.

[1753] *Id.,* pp. 5.4-30, -31, -79, -90, -91
[1754] *Id.,* p. 5.7-190, MM 7-13
[1755] *Id.,* p. 5.7-159

It should be noted that while the Project site is within the general region of convergence of three biological regions, it does not contain this convergence within its borders. Rather, the convergence is generally occurring in the area, inclusive of on-site as well as mostly off-site lands.[1756] The geological fault line information and impacts related thereto are discuss in the Draft EIR Section 5.1, Geotechnical. In addition, although there is high biological value on portions of the Project site, much of the site has been impacted by non-native, noxious weeds such as shortpod mustard (*Hirschfeldia incana*).[1757] Similarly, riparian areas are degraded in most of the low-lying drainages. Consequently, biological diversity is less than would otherwise be expected in many areas. However, native grasslands occur in a patchy distribution throughout large portions of the site which may be attributed to the grazing, which has potentially minimized non-native growth to a level sufficient to allow persistence of native perennial bunch grasses, as described on pages 5.7-42 through 5.7-47 of the Draft EIR. Project implementation would include mitigation actions (see Section 5.7.7, Mitigation Measures, of the Draft EIR) resulting in improved functions and values of many of these resources, in addition to preservation in perpetuity, within the 39,000-acre Centennial Mitigation Preserve as described in PDF 7-1 on page 5.7-135 of the Draft EIR.

Lastly, Section 5.7 of the Draft EIR provides a complete project-level assessment of the biological resource impacts of the Centennial Project. All data collected for the Project are presented and analyzed using the best available scientific information to determine the impacts of the Project as required.

Response to Comment F.8-112A:

The footnote refers to the report: *Proposed Reserve Design for Tejon Ranch – A Threatened California Legacy*.[1758] This report discusses a proposed reserve that combines four landscape unit-specific reserve designs into a single reserve system for the Tejon Ranch totaling 246,382 acres. The original comment advocates that the proposed reserve will help maintain the regional uniqueness. See response to Comment F.8-112. The design of the proposed reserve suggested by the authors is based on larger general landscape level analysis. However, it lacks nearly all of the Centennial site-specific studies that are utilized in the Draft EIR. The assessment of the existing and impacted biological resources and the corresponding biological values of the Project site and adjacent areas as described in Section 5.7, Biological Resources, of the Draft EIR provide a far greater and more detailed level of analysis supported by a myriad of site-specific studies. As such, the determination of the site's development areas, as well as the Mitigation Preserve lands, are consistent with protection of the regional biological resource value. Many of the stated goals of the proposed reserve, including to conserve a large and intact area of natural open space, avoid habitat fragmentation, protect an adequate representation of physical and biological diversity, and enhance existing conservation investments, among others, are met in the proposed Mitigation Preserve. In addition, the Project site is consistent with other regional planning

1756 *Id.,* pp. 5.7-50 to -64, -164 to -170

1757 *Id.,* p. 5.7-159

1758 Conservation Biology Institute and South Coast Wildlands. 2006 (May). *Proposed Reserve Design for Tejon Ranch – A Threatened California Legacy.* http://scwildlands.org/reports/proposedreserve_tejonranch.pdf.

documents including the TRCRWA, the TUMSHCP, and the AVAP (see response to Comment F.7-22).

Response to Comment F.8-112B:

This footnote links to a blog by the California State Action Plan. The blog discusses how the update to the State Wildlife Action Plan 2015 (SWAP) used three separate sets of geographic units (or scales) to identify priority conservation targets (species, habitats, and ecosystems that are the focus of conservation strategies), assess threats to those targets, and develop strategies to conserve those targets. USDA ecoregions were used as the biogeographic units to assess threats and develop strategies for the terrestrial targets of the SWAP. Three ecoregions—the Sierra Nevada, the Mojave Desert, and the South Coast—are mentioned in Comment F.8-112. See response to Comment F.8-112 for further discussion.

Response to Comment F.8-112C:

This footnote links to Chapter 18 from the book, *Geology of California's Imperial Valley*. The chapter discusses the San Areas Fault System. It highlights the details of the San Andreas Fault, including its geographic extent; the nature if its configuration, branches, age, shallow depth; regional differences due to the fault, including the "Big Bend" area, which underlies the Project site in part. See response to Comment F.8-112.

Response to Comment F.8-113:

The Draft EIR has an obligation to follow State CEQA Guidelines and to report on the findings of the various focused and general plant and wildlife surveys that have occurred over the life of the Project.[1759] Detailed studies and mapping provide clearer, not obfuscated information. The grassland studies were conducted with input from the Significant Ecological Areas Technical Advisory Committee (SEATAC) and detailed information was required in an effort to more accurately map and describe the different types of grasslands occurring on the Project site. Mitigation for sensitive habitats requires accurate vegetation mapping procedures, and the grassland studies were integral to the modeling and mapping process on the Project site. The methodology for vegetation mapping is described beginning on page 5.7-24, with further details of the methodology for delineation of grasslands provided beginning on page 5.7-25. The Draft EIR analyzes Project impacts to native grasslands and includes conservation measures to mitigate for losses.[1760] Mitigation for impacts to the native grassland on the Project site shall be no less than 2:1 (see MM 7-10).[1761]

Response to Comment F.8-114:

The Commenter is correct; the original plant report, drafted in December 2004, was revised in May 2006. The revisions that were made to the December 2004 report were made to Section 1, Introduction, and Section 3, Landscape Setting. No edits were made to Sections 2, 4, or 5 (Background Information, Special-Status Plant Surveys, and Perennial Bunchgrass

[1759] DRP 2017, Table 5.7-2, p. 5.7-19
[1760] *Id.,* Sections 5.7.6 and 5.7.7
[1761] *Id.,* p. 5.7-180

Plant Community Study, respectively). All edits were qualitative in nature and did not affect the technical aspects of the report. Edits are as follows:

2004 report, page 1, last paragraph: "The bunchgrass stand on the site is unique in California as an extensive, high quality intact native perennial bunchgrass community" was changed to "The bunchgrass stand on the site constitutes an especially high-quality native perennial bunchgrass community."

2004 report, page 1, last paragraph: "The results can be used to assess potential impacts of the proposed project to this unique native perennial bunchgrass community" was changed to "The results can be used to assess potential impacts of the proposed project to this native perennial bunchgrass community".

2004 report, page 14, second paragraph: "Native perennial bunchgrass community/ wildflower field, (referred to as a 'perennial bunchgrass plant community' in this report), is one of the dominant plant communities in the study area" was changed to "Native perennial bunchgrass community/wildflower field, (referred to as a 'perennial bunchgrass plant community' in this report), is the dominant plant community in the study area".

2004 report, page 14, third paragraph: "This plant community is characterized by a relatively high cover of perennial bunchgrass species (typically greater than 20%), a conspicuously low cover of non-native annual grasses, and prominent open spaces between the individual bunchgrass clumps that support a showy, diverse array of native wildflowers during favorable rain years" was changed to "This plant community is characterized by a relatively high cover of perennial bunchgrass species (often greater than 20%), a conspicuously low cover of non-native annual grasses, and prominent open spaces between the individual bunchgrass clumps that support a diverse array of native wildflowers during favorable rain years"

2004 report, page 15, first paragraph: "… with a conspicuous wildflower component and an unusual lack of introduced annual grass species. Quite frankly, we have rarely seen extensive intact perennial bunchgrass stands of this nature, and it required a second year, with the wildflower component absent, to recognize the habitat as a perennial bunchgrass community" was changed to "… with a conspicuous wildflower component and a lack of introduced annual grass species." The second sentence was removed from the report as it is an anecdotal statement, and inappropriate for a technical report,

2004 report, page 15, second paragraph was removed as it was a duplicate of a paragraph already included on Page 1.

2004 report, page 15, third paragraph: "However, the community has been almost entirely out-competed and replaced by invasive annual grasses introduced during Europeans settlement (Heady, 1995)" was changed to "However, the plant species that made up this community have been entirely out-competed and replaced by invasive annual grasses introduced during Europeans settlement (Heady, 1995)."

2004 report, page 15, third paragraph: "The State of California also considers areas with conspicuous native wildflower displays to be a sensitive plant community called a wildflower field (Holland, 1986; CNDDB, 2004)" was changed to "The State of California also considers areas with conspicuous native wildflower displays to be a sensitive plant community, referred to as wildflower fields (Holland, 1986; CNDDB, 2004)"

2004 report, page 15, fourth paragraph: "The perennial bunchgrass community on the site occupies roughly 5,500 acres within the entire 9,542-acre study area" was changed to "The perennial bunchgrass community on the site occupies approximately 5,500 acres within the entire 9,542-acre study area."

The changes made between the draft and final reports are qualitative. Project mitigation for grasslands include the permanent preservation of 14,908 acres, as well as the available for future biological enhancement activities, if needed, on the 7,490 of grasslands of Wildlife Conservation Board easement areas.

Response to Comment F.8-115:

A literature review and preliminary general walk-over survey of mitigation lands was conducted for the Draft EIR.[1762] Total open space mitigation land is approximately 27,000 acres, which is an approximate 3:1 open space to developed ratio. Both a literature review and on-site reconnaissance survey of mitigation lands were completed as part of the Draft EIR preparation process.[1763] Additionally, a soils, slope, and aspect model was produced to confirm equal conditions could be found on the preserve lands. In the review of these lands, similar species (special status and non-special status) were observed, and have been documented in the California Natural Diversity Database, and thousands of acres of similar habitat were observed.[1764] The on-site mitigation area was designated as part of the overall Specific Plan boundary area for the Project site, which includes both interstitial open space areas within the outer edge of the development envelope and open space areas adjacent to the development areas.[1765]

Response to Comment F.8-116:

Please refer to response to Comment F.8-115. As stated in the Draft EIR in MM 7-10 and MM 7-11,[1766] all mitigation ratios for special status biological resources (except riparian and wetland vegetation types that are not considered jurisdictional by permitting resource agencies) are 2:1 (conserved: impacted) at a minimum. Riparian and wetland vegetation types that are not considered jurisdictional by permitting resource agencies are mitigated at a 1:1 ratio as described in MM 7-12.[1767] Preserved habitat shall be of equal or greater biological value and function. It is acknowledged that a net loss may occur for some species

[1762] DRP 2017, pp. 5.7-18 to -31
[1763] *Ibid.*
[1764] *Id.,* pp. 5.7-18 to -31
[1765] Revised Exhibit 5.7-10; DRP 2017, Appendix 5.0-C
[1766] DRP 2017, p. 5.7-182
[1767] *Id.,* pp. 5.7-180 to -190

or habitats. The mitigation strategy proposed for the Project is current standard mitigation for upland vegetation types.

Response to Comment F.8-116A:

The footnote refers to a study titled, "How Much Compensation is Enough? A Framework for Incorporating Uncertainty and Time Discounting When Calculating Offset Ratios for Impacted Habitat," authored by Atte Moilanen, Astrid J. A. van Teeffelen, Yakov Ben-Haim, and Simon Ferrier published in the journal Restoration Ecology. The research article reviews off-set or mitigation ratios and the problems with success. The article points out that uncertainty in the value of mitigation lands warrants larger ratios to increase certainty. It also states that the risk and uncertainty is much lower and values are more certain when preserving lands in their existing condition as opposed to restoring. The Centennial mitigation lands will be used for very small amount of restoration associated with riparian habitat and woodlands while the majority, nearly all, is to be preserved with management oversight to maintain current conditions.[1768] As such, the article supports the concept that uncertainty of mitigation for projects such as Centennial is much lower due to the existing values on the preserved lands and the lack of reliance on future unknown values of these lands. Also see response to Comment F.8-116.

Response to Comment F.8-117:

The Commenter's opinion regarding plant and animal species occurrence data is noted for the record. The entirety of the Project site has been evaluated for biological resources in numerous studies conducted over a 16-year period, all of which are described in Section 5.7, Biological Resources, of the Draft EIR. Third-party data, such as the scientific biological resources information developed as part of the Tejon Ranch Land Use and Conservation Agreement between Tejon Ranch and the Sierra Club, Natural Resource Defense Council, California Audubon Society, Endangered Habitats League, and Planning and Conservation League; the biological resource information developed and used in environmental impact reports (EIRs) for areas that include the Project site such as the Antelope Valley Area Plan EIR (Los Angeles County), the Northwest SR-138 Corridor Improvement Project EIR (Caltrans), and the Sustainable Communities Strategy EIR (SCAG); and relevant third-party scientific literature is cited in the extensive bibliography included in Section 5.7, Biological Resources, of the Draft EIR.[1769]

More specifically, with respect to the focused surveys done on the Project site and addressed in the Draft EIR, these have been conducted on the Project site since 1999 in potentially suitable habitat for the species being surveyed—an industry-wide methodology. Wildlife species generally inhabit certain habitats while avoiding others. For example, a survey for breeding tricolored blackbirds would focus on areas potentially containing their breeding habitat (marsh) and would avoid areas where no potential for that habitat occurs (oak woodland). A combination of tools such as vegetation and/or topography maps, aerial photograph, and historical knowledge of the site help biologists narrow down their survey

[1768] *Id.,* pp. 4-43 to -46
[1769] DRP 2017, Section 5.7.9 beginning on p. 5.7-195

area for a given species. Certain surveys, such as plant surveys, have been conducted comprehensively and cover the entire Project footprint.[1770] Other surveys are more general in nature, such as raptor surveys, and again in that instance the entire Project site would be surveyed. Focused surveys have been conducted in accordance with approved protocols.[1771] The various biologists studying the site since 1999 have had full access to the Project site. The diversity of the wildlife species is as expected for an extensively grazed landscape (compacted soil, invasive species) with relatively low vegetative cover over the majority of the Project site.

Page 5.7-14 of the Draft EIR describes the characteristics of the surrounding area and states that the Project site is in a region that is at the confluence of several major geographic features and associated biomes, including the Tehachapi Mountains, Coast Ranges, Transverse Ranges (San Gabriel Mountains and Liebre Mountain), Antelope Valley of the Mojave Desert, Central Valley, and the San Andreas Fault Zone. Page 5.7-15 describes how the Tehachapi Mountains to the north of the site are characterized by mosaics of oak woodlands, savannas, scrub/shrub lands, perennial/annual grasslands, and the Angeles National Forest encompasses much of the land further to the south. These descriptions describe the "uniqueness" of the Project region. Specific biological resources that are considered unusual, rare, or unique in the region are generally discussed in detail in the document, such as blue oak woodland[1772], extensive grassland and wildflower fields[1773], and tricolored blackbirds[1774]. The cumulative consideration of each of the unique biological resources values on the Project site and in the region provide the reader with a landscape-level perspective. The approach used by the Draft EIR is consistent with standard practice and is not intended to underplay "landscape scale uniqueness" but rather to portray the site's biological resources with industry standard methods.

Response to Comment F.8-118:

The Commenter is correct. Two separate firms conducted grassland studies on the Project site and the surrounding areas. The site was studied by Natural Resources Consultants (NRC) in 2008, as well as in 2006 and 2007.[1775] No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-119:

The Commenter is correct in identifying the correlation between soil types and plant occurrences, as noted in the 2004 Vollmar Consulting study referenced by the Commenter, and as discussed in the Draft EIR, Chapter 5.7 *Biological Resources,* on pages 5.7-20 (Table 5.7-2), 5.7-24 through 27, 5.7-29, 5.7-41, 5.7-43, 5.7-44, 5.7-46, 5.7-83, 5.7-85, 5.7-87 through 5.7-93, 5.7-157, and 5.7-266. It should be noted that, although much of the grassland acreage on the Project site contains a high percentage of non-native species, all grasslands

1770 *Id.,* Table 5.7-2
1771 *Id.,* Appendix 5.7-B
1772 *Id.,* p. 5.7-36
1773 *Id.,* p. 5.7-40
1774 *Id.,* pp. 5.7-112 to -114
1775 *Id.,* Table 5.7-2

impacted on the Project site are being treated as a special status habitat type and shall be mitigated for at no less than a 2:1 ratio.[1776] Furthermore, and as stated on page 5.7-181, MM 7-10, mitigation for loss of those areas modeled as native perennial grassland will provide similar habitat quality as that which was lost. The result shall be native perennial grassland and wildflower field values that are equal to or greater than the overall ecological functions and values of those lost as a result of Project implementation. Preservation shall include dedication and long-term management working towards the goal of a self-sustaining system. Long-term management will include focused major problematic non-native species eradication (e.g., feral pigs) where feasible.[1777] Preservation will occur on open space lands on the Project site and on other lands within Tejon Ranch.

The Commenter states that the Vollmar study anecdotally observed differences in the size and quality of NPG and wildflower fields (WFF) in the eastern and central portions of the Project site, where they were noted as being larger and more species rich. The NRC studies were rigorous multi-year (2006, 2007, and 2008) studies that included predictive modeling, while the Vollmar study was conducted in one year (2004) and was not nearly as intensive as the NRC studies.[1778] The Vollmar study states that the NPG on the Project site are "primarily restricted to two geologic formations, Continental Deposits and Terrace Deposits"; however, the multi-year NRC studies show very high species richness and relative native cover for grassland plots located within Santa Margarita formations in the western portion of the Project site (unimpacted Mitigation Preserve area).[1779] The NRC studies corroborate the Vollmar anecdotal observations of relatively large, species rich, native grasslands in the central and eastern portion of the Project site, but this is not the only area on the Project site where high quality grasslands occur; the western portion also contains high quality NPG.

The Commenter points to the east-west trending ridges and valley landforms in the central and eastern portion of the Project site to explain the high species richness and large stand size (per Vollmar) of NPG and WFF in these areas, and questions evaluation of the grasslands in the areas proposed to be developed versus areas that would provide mitigation for the developed areas due to a lack of these particular land forms. While the Commenter is correct, the Project site does support landforms unique to the local area—east-west trending ridgelines and valleys, close inspection of the surrounding lands show similar or higher-quality NPG and WFF than are found on the Project site.[1780] Differences in cover of several plant groups, including native perennial forbs and native perennial grasses were not found among the four defined sampling sites (southern slopes, Centennial Specific Plan boundary, north mitigation area, and south mitigation area).[1781] The highest quality grassland and native forb communities were found in the southern slopes area north of the Project site, and where Mitigation Preserve Areas 2, 3, 4, and 6 are currently located.

[1776] *Id.,* p. 5.7-160
[1777] *Id.,* p. 5.7-181
[1778] *Id.,* p. 5.7-26
[1779] *Id.,* Appendix 5.7-B
[1780] *Ibid.*
[1781] *Ibid.*

Response to Comment F.8-120:

The NRC grassland studies were designed to conduct a comprehensive quantitative analysis describing the distribution and composition of native and non-native grasslands within the Centennial Specific Plan.[1782] In order to ensure the highest possible quality, Centennial Founders assembled a Scientific Review Committee composed of Bruce Pavlick, Ph.D. and Dennis Murphy, Ph.D. to monitor all aspects of this study including study design, data acquisition, and statistical analyses.[1783] Because the Project overlapped SEA 17 prior to 2008, the SEATAC committee was also involved in reviewing, and providing suggestions on, the NRC grassland studies.

The Commenter incorrectly states that the NRC studies did not factor in geology or soils into their studies. The variables used in the NRC analysis included: elevation, slope, aspect, slope position, topographic ruggedness index, compound topographic index (CTI), curvature, easting, and curvature x easting. Not only was geology/topography factored in the study, but CTI has been shown to be highly correlated with several soil attributes such as horizon depth, silt percentage, organic matter content, and phosphorus. The variables used in the NRC study are much more precise than solely soil type.

Additionally, the Commenter suggests that the NRC studies are strongly compromised by not incorporating the soil type into the variables analyzed. As stated above, soil attributes (CTI) were incorporated into the design, and incorporating the soil type would not serve to improve the studies. The NRC studies were scientifically sound and achieved a successful predictive model describing the distribution of native perennial bunch grass (NPBG) stands within the Centennial Specific Plan Area. Species richness, native species richness, and cover of native species are all positively correlated with several topographic variables, including elevation, easting, and slope. While the NRC predictive model was able to predict the cover class of four distinct classes of NPBG 37 percent of the time; the accuracy increased to 69 percent when placed in two categories (Category A: <10 percent, Category B: ≥ 10 percent). NRC recognizes there is room for improvement within the design of the model by incorporating temporal variation of rainfall. By refining the existing model, the predictive capability, statistical robustness, and overall accuracy of the NPBG model will increase.[1784] According to the grassland Scientific Advisory Committee, for biological systems, a model with 69 percent accuracy is generally considered above average.[1785]

Response to Comment F.8-121:

For the purposes of accurately describing the existing NPBG on the Project site in order to properly assess impacts and mitigation, extensive multi-year grassland studies were conducted on the Project site and the vicinity of the Project site.[1786] Based on the predictive NPBG cover generated by the GIS model developed by NRC, the grasslands were divided into four categories: absolute cover of less than 4.99 percent, between 5.00 and 9.99 percent,

[1782] *Id.,* pp. 5.7-26 and -27
[1783] *Id.,* Appendix 5.7-B; *Id.,* p. 5.7-26
[1784] *Id.,* Appendix 5.7-B
[1785] *Id.,* pp. 5.7-27 and -47
[1786] *Id.,* p. 5.7-19, Table 5.7-2

between 10.00 and 14.99 percent, and greater than 15.00 percent.[1787] Describing SPA grasslands using these four categories allowed the predictions of the model to reference standard percent-cover definitions for native and non-native grasslands used by local and regional resource protection agencies. Additionally, a description of the native perennial grasslands found on the Project site can be found on Draft EIR page 5.7-40, in Section 5.7.3, Environmental Setting, of the Draft EIR. This discussion provides the most closely related Sawyer and Keeler-Wolf and Twisselmann and Moe description of the native grasslands found on-site.

Response to Comment F.8-122:

The NRC grassland studies collected cover data for the following categories: native perennial bunch grass, native perennial rhizomatous grass, native annual grass, introduced annual grass, other native species, other introduced species, litter, rock, bare ground, and unknown plant species. As stated on page 5 of the 2007 NRC grassland study, "The dependent variable we chose to model as a surrogate measure of native perennial grasslands was absolute canopy cover of NPBG (See Section 4.3). Although grassland quality is ideally determined by additional factors such as native species richness and cover, amount of bare ground present, and severity of invasion from non-natives, choosing to model absolute NPBG cover facilitates easy interpretation and increased predictability. Attempts were made to model the distribution of native annual forbs and other variables; however, the predictive ability of these models was poor. Other components of healthy native grasslands [such as ground cover] were analyzed as part of the grassland composition analysis (see Section 2.3.1.2) and as validation of the NPBG habitat model." Bare ground was analyzed as part of the NRC studies, and was found to be highly correlated with the highest quality NPBG and native annual forb community.[1788]

Response to Comment F.8-123:

Wildflower fields are a component of the grasslands. Rigorous characterization of the wildflower fields can be found in the NRC grassland studies. The primary stated objective of the 2008 NRC grassland study was to, "Quantify trends in grassland community composition within the SPA [Specific Plan Area] and mitigation areas with particular attention given to a) native perennial bunchgrasses and b) native annual forbs".[1789,1790] The NRC grassland studies thoroughly analyzed the composition of the native annual and perennial forbs found on the Project site and the mitigation preserve areas. Based on statistical analysis, five different community types were determined and mapped for the Tehachapi sampling area in 2007. Variables included: northing, easting, elevation, aspect, slope, curvature, species richness, nativeness index, and percent cover. While the Commenter is correct, high quality native annual forbs (NAF) and native perennial forbs (NPF) can be found in the central and eastern portion of the Project site, the highest quality native forb cover was found in the southern slopes sampling area (generally north of the Project site) in 2007, while in 2008

[1787] *Id.,* pp. 5.7-44 and -45
[1788] *Id.,* Appendix 5.7-B
[1789] *Id.,* Appendix 5.7-B, Plant-8
[1790] *Ibid.*

the southern mitigation area had the highest cover of native forbs. The cover of native annual forbs increases with elevation and easting, possibly due to greater available water from snowpack.[1791,1792] Attempts were made to model the spatial distribution of the annual forbs but predictive results were poor due to the drastic variability of cover among years with differing precipitation rates.

The Commenter makes a statement about the Vollmar study recording over 70 native species, and a positive correlation was found between native forb species richness and increasing NPG cover. Over 130 native forb species were documented in the 2007 NRC study. The NRC studies did not show a significant correlation between native forb species and NPBG, but instead found that native forbs were common throughout the Project area and off-site mitigation grasslands.[1793] Please refer to the grassland studies included in Draft EIR Appendix 5.7-B, Nos. Plant-5, Plant-6, and Plant-8 for a detailed description and analysis of the wildflower field communities found on and adjacent to the Project site.

Response to Comment F.8-124:

The grassland community, as a whole, on the Project site is being treated as special status, and appropriate mitigation is provided in the Draft EIR.[1794] Rather than splitting up the grasslands into sensitive and non-sensitive sections, the Project is treating the grasslands as a whole, with the functions and values being mitigated for by the preservation and enhancement of grassland areas nearby that are composed of the same mosaic distribution of non-native and native dominated communities. The NRC studies provide exhaustive quantification of the wildflower field communities as well as the native bunch grass communities found on the Project site and vicinity. Mapping of five statistically distinct communities is provided in the 2007 NRC report, and high quality native forb communities mapped can be found within this report. Please refer to responses to Comments F.8-121 through F.8-123 for further background information regarding vegetation mapping.

Response to Comment F.8-125:

Please see response to Comment F.8-124 for a discussion of the Project's conservative approach to treating grasslands, which recognizes the mosaic of grassland types and qualities and requires mitigation for impacts to all grasslands, not just NPG and WFF, most of which qualify as non-native grasslands. In addition, the validity of the Mitigation Preserve to provide for the preservation of grasslands and wildflower fields, similar to the impacts grasslands and wildflower fields, is demonstrated in the Draft EIR. As shown on revised Exhibit 5.7-10, Mitigation Preserve, included in this Final EIR following page 3-116 (Volume 2) and originally on page 5.7-135 of the Draft EIR, immediately adjacent lands that represent as close a proximity as feasible are captured within the Mitigation Preserve. The lands, including the grasslands within them, are not only contiguous with the Project site, but also with other open space lands set aside by the Tejon Ranch Company. The NRC grassland studies of the site and adjacent lands provide data indicating that the highest quality NPBG

1791 *Id.,* Appendix 5.7-B, Plant-5
1792 *Ibid.*
1793 *Id.,* Appendix 5.7-B, Plant-8
1794 *Id.,* pp. 5.7-180 to -183, MM 7-10

and native forb communities occurring in the Mitigation Preserve areas.[1795] Further, as described in Appendix 5.7-C of the Draft EIR, a reconnaissance survey of the mitigation preserve in 2015, conducted during peak bloom as part of a Mitigation Lands Review, confirmed this finding. Vast native wildflower fields, larger than any observed on the Projects site, were observed within the mitigation preserve.[1796] The Commenter states that the NRC studies omitted geological/soils as a parameter; however, the studies and resulting model were far more comprehensive than relying solely on geology/soils. Variables used in statistical analysis included: northing, easting, elevation, aspect, slope, curvature, among others. Please see response to Comment F.8-120 for further discussion on geology/soils used as parameters in the NRC studies.

Response to Comment F.8-126:

The comment is noted for the record. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-127:

While the Project site does contain some areas of high quality native grasslands, exhaustive multi-year studies of the surrounding lands have concluded that higher quality grasslands and wildflower fields are found within the mitigation areas.[1797] It is reasonable to conclude that the proximity to snowpack in the higher elevations may benefit these areas.

Also see responses to Comments F.8-113 and F.8-118 through F.8-122.

Response to Comment F.8-128:

The grasslands are not unique to the Project site; 14,908 acres of grasslands will be preserved on the Mitigation Preserve, which grasslands abut and present a continuation of the Project site grasslands.

Mitigation lands have been surveyed in part, a literature review has been conducted, and a soils, slope, aspect analysis has been conducted to confirm similar conditions occur on the Project site and mitigation preserve. During these efforts, several of the special status species that have been documented on the Project site were found in the mitigation preserve. Suitable habitat for all special status plants is present on the Mitigation Preserve and individual plants will be preserved.

In accordance with the recommendation in Comment B.4-43, the Project's priority shall be preservation of the six special status plant species impacted by the Project. Prior to issuance of grading permits, detected special status plant species populations on the Mitigation Preserve meeting the 2:1 mitigation ratio, shall be quantified and documented for preservation in perpetuity. If the preservation ratio is less than 2:1 for one or more of the six impacted species, enhancement and/or creation to expand preserved population(s) of the species to a quantity representing a minimum 2:1 ratio within the Mitigation Preserve shall

[1795] *Id.,* Appendix 5.7-B
[1796] *Id.,* Appendix 5.7-C
[1797] DRP 2017, Appendix 5.7-B

be accomplished using the feasible methods further delineated in the table provided in response to Comment F.8-128.

To modify the Draft EIR in accordance with this preservation component per the discussion above, the last two sentences of the second paragraph on page 5.7-142 are hereby edited as follows:

> Implementation of MM 7-1, proposed to mitigate for impacts to special status plants, would reduce the level of impact by promoting the distribution of this species in the Project region through the preservation and/or ~~propagation~~ enhancement of ~~new~~ existing populations and creation of new populations, if necessary, in the Mitigation Preserve. The expansion of the local population of this species is expected to increase its potential to be sustained in perpetuity.

To modify the Draft EIR in accordance with this preservation component per the discussion above, the last two sentences of the first partial paragraph on page 5.7-143 are hereby edited as follows:

> Implementation of MM 7-1, to mitigate for impacts to special status plants, would reduce the level of impact by promoting the distribution of this species in the Project region through the preservation and/or ~~propagation~~ enhancement of ~~new~~ existing populations in the Mitigation Preserve. The expansion of the local population of this species is expected to increase its potential to be sustained in perpetuity.

Additionally, the final sentence in the fourth paragraph of MM 7-1 on page 5.7-174 is hereby edited as follows:

> These existing areas shall be (in order of priority) preserved, enhanced, expanded, ~~or~~ restored, or created ~~or new areas shall be created in suitable habitat~~ in order to compensate at a 2:1 ratio for the thousands of individual special status plants that will be lost due to the Project.

Beyond preservation (the priority for plant mitigation goals), the preferred method for achieving the 2:1 replacement ratio of special status plant species is enhancement or expanding of existing populations. Creation of populations is the method that shall be employed if the 2:1 ratio cannot be met through preservation and enhancement. Although a literature search did not find specific information on the species impacted on the Project site, many successful rare plant restoration projects have been conducted. For example, The New England Wild Flower Society developed a successful method to germinate Robbins' cinquefoil seeds and to accelerate their development into seed-producing adults for transplanting. Between 1973 and 2006 the population rebounded 2.5 times. The species was removed from the federal Endangered list in 2002. Follow up monitoring post-recovery

goals, indicated the cinquefoil numbers and condition remained stable.[1798] Further, successful reintroduction has also been accomplished with the special status species western yampah (*Perideridia erythrorhiza*), endemic to southern Oregon.[1799] Although long-term monitoring data is not available, during the three years the transplantation was monitored, 90 percent of transplanted plants reproduced successfully.

Evidence for a greater degree of potential success is based on observations of many of the special status plants requiring mitigation located in the Mitigation Preserve during a reconnaissance survey and during focused plant surveys. Such observations indicate highly compatible conditions for the proposed preservation, creation, and/or enhancement/restoration of special status plant populations. Apart from direct observations of special status plants requiring mitigation, the level of compatibility is supported by similarities in soil type, slope, aspect, and distance from known populations. Additionally, special status plant species impacted by the Project (California androsace, adobe yampah, and sylvan microseris), and many other special status plant species not impacted by the Project, have been documented in the Mitigation Preserve by the Tejon Mountain Village Project.[1800] The documentation of multiple populations of these species on the Mitigation Preserve further adds to the regional value of these mitigation lands and the increases the likelihood of persistence of the species in the region.

Furthermore, the Project's 39,000-acre Mitigation Preserve is coupled with two regional conservation plans, the Tejon Ranch Conservation and Land Use Agreement (TRCRWA) and the Tehachapi Upland Multiple Species Habitat Conservation Plan (TUMSHCP), which further contribute to sustaining regional plant populations. Under the TRCRWA, the Tejon Ranch Conservancy will adopt, update, monitor and enforce implementation of the Ranch-wide Management Plan (RWMP) on dedicated conservation areas and option areas subject to conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch. Maintenance of the open space or conserved lands will be the responsibility of the Conservancy, funded in large part by a fee based on a portion of the purchase price for each residential parcel on Tejon Ranch. Since Centennial constitutes over 75 percent of the currently planned residential units on the Ranch, it will bear the substantial costs of funding the Conservancy.[1801]

In addition, the TUMSHCP ensures the persistence of covered species, including sustaining viable populations of those species. Lands to be conserved as part of the TUMSHCP are adjacent to other lands within Tejon Ranch ownership and are also slated to be protected as part of the TRCRWA. The sum of these interconnected open space commitments, development restrictions, and mitigation measures is a conservation commitment that is, by

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1798 United States Department of Agriculture, Forest Service (USDAFS). 2017 (November, access date). Recovery of Robbins' Cinquefoil - *A Partnership Success*. Washington, DC: USDAFS. https://www.fs.fed.us/wildflowers/Rare_Plants/conservation/success/potentilla_robbinsiana_recovery.shtml.

1799 Roberts, Kimberly A. 2003. Conservation Biology of Perideridia erythrorhiza (Apiaceae): Experimental Reintroduction and Life History. Oregon: Oregon State University.

1800 Kern County Planning Department (Kern County). 2009 (May). *Draft Environmental Impact Report, SCH# 2005101018, Tejon Mountain Village by TMV, LLC*. Kern County, CA: Kern County.

1801 DRP 2017, pp. 5.7-62 and -63

design, consistent with conservation biology principles calling for large, interconnected blocks of habitat that support the life history requirements of Covered Species and other resident plant and wildlife populations. Through the various conditions and measures stipulated by the TUMSHCP for the various covered species, habitat for these and many additional species will be preserved and enhanced, which will promote healthy plant and wildlife communities throughout the region. Although the focus of the TUMSHCP is on the California condor and other species of the montane upland communities, many of the same species occur in the foothills and lowland areas as well, including the Centennial site. These species will benefit from the TUMSHCP in addition to the Centennial Mitigation Preserve program.[1802] In addition, the U.S. Fish and Wildlife Service considered development within the region, specifically inclusive of several major projects including Centennial, Newhall, Tejon Mountain Village, and Grapevine, in the TUMHSCP, and concluded that the TUMSHCP includes measures to minimize and mitigate remaining impacts on Covered Species and measures that contribute to conservation and recovery.[1803]

In addition, the last two sentences of the second paragraph of MM 7-1 are hereby deleted as extraneous (see also the table provided in response to Comment F.8-128 for more detail on the Special Status Plant Species Restoration Plan):

> ~~Adoption of this plan shall be used as the performance standard. An overview of the plan objectives is provided in the Biological Resource Mitigation Program to be submitted and approved by the County prior to issuance of grading permits.~~

Response to Comment F.8-129:

Please see response to Comment F.8-128.

Response to Comment F.8-129A:

The referenced document is acknowledged and will be provided as part of the record. The document is cited to support a specific assertion in Comment F.8-129, which is substantively addressed in response to Comment F.8-128. Please see responses to Comments F.8-128 and F.8-129.

Response to Comment F.8-130:

The Biological Resources Mitigation Program is simply a compilation of each of the separate required mitigation plans and would have no additional information. Each of the referenced plans listed in the mitigation measures on pages 5.7-173 and 5.7-194 of the Draft EIR includes performance objectives and identifies feasible means of achieving those performance objectives, which is a form of mitigation measure commonly used and has been

[1802] *Id.,* p. 5.7-63
[1803] *Id.,* pp. 5.7-16 to -18

repeatedly confirmed as legally adequate in CEQA court cases. Please see response to Comment F.8-173.

Response to Comment F.8-131:

For the Mitigation Preserve, a Mitigation Monitoring and Reporting Program (MMRP) will be developed and initially managed by biologists until sign-off is achieved by the appropriate Agencies, at which time the Tejon Conservancy shall manage the mitigation lands in accordance with the Ranch-wide Management Plan. Grazing is an ongoing use in this open space preserve area, and as discussed in the Draft EIR,[1804] grazing practices have largely resulted in the conditions that exist in this area. MM 7-1 provides specific mitigation requirements for designated special status plant species in the open space preserve. Grazing is anticipated to continue to be a key component of the management of these open space lands, and the value of grazing as a means of protecting plant species has been consistently recognized by federal and State biological protection agencies. For example, in the TUMSHCP, the USFWS requires grazing[1805] and in the Tejon Mountain Village permits from CDFW, CDFW requires grazing. The Commenter's negative opinion about grazing, and the role of grazing in the Ranch-wide Management Plan, is noted. It should be noted that the Ranch-wide Management Plan includes grazing practices and monitoring focused specifically on maintaining grasslands and increasing habitats for pronghorn and other species. See response to Comment F.8-173. The Ranch-wide Management Plan also includes a suite of management tools like weed management and active and passive restoration; therefore, grazing is among a suite of management tools to be utilized to preserve the habitat in perpetuity.

Response to Comment F.8-131A:

The footnote provides a link to the Tejon Ranch Conservancy Ranch-wide Management Plan. See response to Comment F.8-131.

Response to Comment F.8-132:

The comment is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-133:

An estimated six acres of oak woodlands are anticipated to be impacted by Project activities,[1806] and the Draft EIR determines that Project-related oak woodland impacts are considered potentially significant.[1807] Mitigation for impacted oak woodlands is outlined in Section 5.7.7, Mitigation Measures. MM 7-11 calls for a 2:1 ratio of conserved versus impacted acreage. Further clarification of the Oak mitigation requirement is included in

[1804] *Id.,* pp. 5.7-11, 45, 159

[1805] Dudek and Associates, Inc. (Dudek). 2013 (April). *Final Tehachapi Upland Multiple Species Habitat Conservation Plan* (Prepared for the Tejon Ranch Corp). Encinitas, CA: Dudek.

[1806] DRP 2017, p. 5.7-157, Table 5.7-12

[1807] *Id.*, pp. 5.7-160 and -161

response to the Commenter's related deferred mitigation comment in response to Comment F.8-173, infra. Additionally, the Oak Woodland Mitigation Plan is required to comply with the standards and requirements of Section 21083.4 of the California Public Resources Code (SB 1334) and the County of Los Angeles Oak Tree Ordinance, which includes among other things that the tree replacement requires that replacement trees be the same species removed. In addition, the measure requires site-specific native acorns to be collected to ensure that acorns collected are of a similar genetic stock to those existing on the site. Specifically, item 6 on page 5.7-184 of the Draft EIR states that creation of structurally diverse oak woodland habitat within and contiguous to existing oak woodlands will be accomplished by planting locally collected oak acorns, plus yearly sowings of additional locally collected acorns.

Response to Comment F.8-134:

The Commenter's opinion is noted. Please refer to response to Comment F.8-173.

Response to Comment F.8-135:

Draft EIR Appendix 5.7-B, Plant-11, was initially prepared in 2009 when the Project development footprint extended into approximately 174 additional acres of oak woodland and affected 3,486 more oak trees that are subject to the County's oak tree protection ordinance.[1808] Following approval of the Antelope Valley Area Plan and designation of the boundaries of the West EOA, the Project development footprint was reduced with impacts to oak woodlands decreasing to 6 acres,[1809] and impacts to oak trees decreasing to 91 trees.[1810] The proposed Project does substantially reduce impacts to oak woodlands and oak trees in relation to the project footprint under consideration in the referenced plan, and an additional oak woodland/oak tree reduction plan is not required under CEQA.

Response to Comment F.8-136:

All wildlife species detected during the previous 20 years plus of surveys on the Project site have been recorded. Please refer to the wildlife compendium provided as Appendix 5.7-A, Plant and Wildlife Compendia, to the Draft EIR, and to the description of wildlife species documented onsite on pages 5.7-47 through 5.7-50, and pages 5.7-88 through 5.7-128. The comment expresses an opinion about the Project. The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. However, because the comment does not address or question the content of the Draft EIR, no further response is required.

Response to Comment F.8-137:

No take of a fully protected species is anticipated to occur as part of the Project implementation. The four fully-protected species referenced by the Commenter are all birds and use the site only for foraging habitat. All observations of the four fully-protected bird species have been fly-overs migrants, or seasonal foraging and no breeding of these species

[1808] *Id.*, p. 8-33
[1809] *Id.*, p. 5.7-88
[1810] *Id.*, p. 5.7-171

has been recorded on the Project site. Additionally, one of these four species, the bald eagle, has only been observed on off-site adjacent areas, with no observation on-site. As outlined in MMs 7-2 and 7-8, pre-construction surveys for breeding raptors shall be conducted and Project impacts to all breeding raptors (including the four identified fully protected species) shall be avoided. Direct impacts to non-breeding raptors are not expected; however, a biological monitor will be on-site during construction activities to survey for and alter or relocate crews should a fully protected species enter the vicinity of the work area. Loss of foraging habitat, alone, from development would not cause take for purposes of California's fully protected species laws. Because these four species only use the Project site for foraging, there would be no direct impacts with implementation of MMs 7-2, 7-6, 7-8, as explained further in responses to Comments F.8-143 through F.8-149. As such no "take" of a California fully protected species would occur.

Additionally, regarding the statement that the bald eagle was not identified in the Draft EIR, presumably the Commenter is referring to the Draft EIR compendium.[1811] The bald eagle is appropriately not included because the species has not been observed on-site. The Commenter refers to Appendix 5.7-B, Gen 6, which states on page 43 at the end of the first paragraph, "While bald eagle and southwestern pond turtle were not observed on the site, they were observed adjacent to the site at Quail Lake." The Commenter also refers to Appendix 5.7-B, Birds 1, which states in the last paragraph of page 9, "A total of twelve special-status animals were observed on the study area; an additional species, bald eagle (listed as federally threatened) was observed foraging at nearby Quail Lake." Both of the referenced documents address bald eagle specifically and both indicate observing this species off site at Quail Lake. Therefore, the bald eagle is appropriately not included in the Draft EIR Plant and Wildlife Compendium in Appendix 5.7-A because the species has not been observed on-site.

Response to Comment F.8-137A:

The footnote links to the California Department of Fish and Wildlife's (CDFW) Fully Protected Animals webpage. It lists all the wildlife species found in the Fish and Game Code Sections 3511, 4700, 5050, and 5515. All fully protected species on or adjacent to the Project site were analyzed. See response to Comment F.8-137.

Response to Comment F.8-138:

The Draft EIR also notes the success of the condor recovery efforts. Condor use of the Project area is discussed on page 5.7-119. See also response to Comment F.8-139.

Response to Comment F.8-138A:

The cited document is acknowledged and will be included in the record. It is cited in Comment F.8-138 to support the statement that Condor recovery efforts have been

[1811] *Id.,* Appendix 5.7-A

successful in California. The Draft EIR also notes that success on page 5.7-119. See also response to Comment F.8-138.

Response to Comment F.8-139:

The Commenter is correct. The Draft EIR incorrectly states that all condors are fitted with radio transmitters. Although the statement was true at one point, wild population expansion has made it infeasible for all condors. A more accurate statement based, on recent condor status updates from the USFWS, would be to say that, *many* are fitted with transmitters.[1812] In response to this comment, the following text is hereby added within the second paragraph on page 5.7-148 of the Draft EIR:

> ~~All~~ Most adult California condors are wing-tagged and many are fitted with radio transmitters.

High altitude fly-overs of the Project site are not disputed in the Draft EIR, but it is not accurate to suggest condors are "consistently using the proposed Project site", as the Commenter has suggested here. To state that the Project site is within the boundaries of the California condor flight path would be more accurate.

Response to Comment F.8-140:

As shown in the referenced 2009 Cogan report, the Project site is on the eastern edge of the historic condor range, and some fly-overs have occurred, although the core flight paths are located to the west of the Project site. The Cogan report shows only visually recorded flight lines over the Project site between 1982 and 1987. During years GPS data was collected, no locations were recorded over the Project site between 2003 and 2008.[1813] As described on page 5.7-119 of the Draft EIR, current satellite and radio-telemetry location data have shown that California condors occasionally travel above the Project site, but rarely occur on the Project site itself. The Draft EIR goes on to describe observations of flying condors prior to 1987 indicate that, on the few instances that they were known to have flown over valley floor habitat (including the Centennial Project site), the birds were usually flying high over the landscape, probably at an altitude of over 1,000 feet. During these flights, the condors rarely, if ever, landed and their movements appeared transitory. To date, four GPS location points out of many thousands were in the vicinity of the Centennial Project site. The Draft EIR fully acknowledges the rare instances of flyover condors.[1814]

1812 U.S. Fish and Wildlife Service (USFWS). 2015 (December 31). *California Condor Recovery Program 2015 Annual Condor Population Status Update*. www.fws.gov/cno/es/pdf%20files/Ca-Condor-Recovery-Prog2015PopulationStatus.pdf.

1813 Cogan, Christopher B. 2009 (June 12). *California Condor Activity in the Tejon Ranch Region.* San Francisco, CA: Center for Biological Diversity. https://www.biologicaldiversity.org/species/birds/California_condor/pdfs/CondorActivityInTheTejonRanchRegion.pdf.

1814 DRP 2017, pp. 5.7-94, -119, -120

Response to Comment F.8-140A:

The reference footnote is the same as the 2009 Cogan report cited by the Commenter and is responded to in response to Comment F.8-140.

Response to Comment F.8-141:

The Draft EIR correctly concluded that impacts to condor less than significant. The USFWS analysis supports this conclusion. See response to Comment F.8-143. Nevertheless, MM 7-6 is revised to incorporate recommendations from Pete Bloom (2009) as follows:

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

~~To further protect California condors potentially foraging in the Project area over the long term from negative interactions with humans and/or artificial structures, the~~ Cattle Carcass Relocation - The Project Applicant~~/Developer~~ shall remove dead cattle that are found ~~or reported~~ within 1,000 feet of the boundary of a residential or commercial development within 24 hours. ~~Dead cattle shall be relocated to a predetermined location.~~ The Approved Biologist will select locations ~~where carcasses shall be placed shall be~~ a minimum of 1,000 feet from ~~a~~ development ~~area boundary. Appropriate locations~~ areas for ~~transfer~~ relocation of carcasses ~~include open grasslands and oak/grassland areas where condors can readily detect carcasses~~

~~and easily land and take off without encountering physical obstacles such as powerlines and other utility structures~~. The proposed locations would be ~~selected and~~ approved by the CDFW and USFWS. ~~Pursuant to this measure, a~~ A telephone number for reporting dead cattle shall be provided ~~and actively maintained. Any cattle carcasses transferred to the relocation areas shall be reported to the USFWS Condor Group~~ by the Applicant.

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

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

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

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

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

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

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

Response to Comment F.8-142:

Based on this comment and others, MM 7-6 of Section 5.7.7, Mitigation Measures, of the Draft EIR have been revised. Please see response to Comment F.8-138. In addition, the Draft EIR analyzed the build out of the Project, including on-going occupancy and use of the Project site, and includes condor mitigation measures that remain applicable for on-going operations which address debris removal including microtrash. See MM 7-6 on page 5.7-177 of the Draft EIR as well as response to Comment F.8-138.

Response to Comment F.8-143:

Please refer to the response to Comment F.8-141. The U.S. Fish and Wildlife Service (USFWS), which is the federal agency charged with implementing the federal Endangered Species Act,

including programs and permitting relating to the California condor, examined the impacts of the build out (affecting less than 10 percent of the Ranch) under the Tejon Ranch-Wide Agreement, including the Centennial Project, as part of the cumulative impacts analysis for the TUMSHCP. The USFWS concluded that the completion of these development projects would not adversely affect the recovery of the condor.[1815] The Draft EIR similarly concludes that Project implementation is not expected to result in significant adverse impacts on this species. However, MM 7-6 is included to further ensure that the proposed Project does not result in future impacts on the California condor. See response to Comment F.8-141 for the revisions to MM 7-6.

Response to Comment F.8-144:

Although surveys for the Draft EIR documented golden eagles foraging on the Project site, no nests were found.[1816] Additional aerial nesting surveys were not performed because the impact footprint for the proposed Project does not provide suitable nesting habitat for this species. This raptor is known to nest in the higher elevations surrounding than found on the Project site.[1817] The few observations of golden eagles were high overhead either foraging or passing by, with no behavior suggesting nesting activity on or near the Project site. Based on these observations, additional aerial nesting surveys were not considered necessary because any nesting golden eagles would likely be outside standard buffers used to avoid impacts to an active raptor nest. However, MM 7-2 on page 5.7-176 of the Draft EIR is amended as follows to require pre-construction nesting surveys for golden eagles prior to initial site preparation. Surveys within ten miles are unwarranted due to the lack of potential effect Project implementation could have on nesting eagles at such great distances from the Project site. Edits made to MM 7-2 increase the distance for golden eagle to ½ mile, which adequately protects golden eagles within potential zone of impact from the Project.[1818] (See response to Comment B.4-26 for additional revisions to MM 7-2 related to Swainson's hawk.) MM 7-2 on Draft EIR page 5.7-176 is hereby edited with the addition of the following text:

> Prior to issuance of grading or building permit, the Project Proponent shall conduct appropriate golden eagle pre-construction surveys and avoidance measures as identified below.
>
> *Golden eagle pre-construction surveys*
>
> Pre-construction surveys for golden eagle shall be conducted prior to construction activities. Surveys for active nests will be conducted by the Project Lead Biologist in all potentially suitable habitat areas within a 0.5-mile radius of all Project activities. Methods employed shall be consistent

[1815] USFWS 2012

[1816] DRP 2017, pp. 5.7-92, -150

[1817] California Department of Fish and Wildlife (CDFW). 2017 (November). California Natural Diversity Database. Records of Occurrence for the golden eagle occurring in USGS Grapevine, Pastoria Creek, Winters Ridge, Liebre Twins, Frazier Mountain, Lebec, La Liebre Ranch, Neenach School, Alamo Mountain, Black Mountain, Liebre Mountain, and Burnt Peak, California 7.5-minute quadrangle maps. Sacramento, CA: CDFG, Natural Heritage Division.

[1818] Pagel, J.E., D.M. Whittington, and G.T. Allen (Pagel et al.). 2010. *Interim Golden Eagle inventory and monitoring protocols; and other recommendations*. Division of Migratory Bird Management, U.S. Fish and Wildlife Service.

with standard and appropriate protocols for golden eagle and within the appropriate season of the year prior to construction.

Golden eagle avoidance measures

If active golden eagle nests are found during these surveys, no intensive disturbances (e.g., heavy equipment operation associated with construction, use of cranes or draglines, new rock-crushing activities) or other Project-related activities that may cause nest abandonment or forced fledging shall occur during initial ground disturbance construction within 0.50 mile of an active nest between March 1 and September 15. The buffer zone may be decreased to 0.25 mile around nests for subsequent construction (i.e., in areas where disturbance—such as heavy equipment operation associated with construction, use of cranes or draglines, new rock-crushing activities—is not a normal occurrence during the nesting season). Active nest trees (where the nest is intact and has been used in the last year) shall not be removed.

Golden eagles occupy very large territories with average territorial sizes in southern and northern California estimated to be 36 square miles and 48 square miles, respectively.[1819] The Los Angeles County breeding-season population is about nine pairs.[1820] Based on this information and the results of Project surveys, only one or two pairs of golden eagles are expected to occupy the west end of the Antelope Valley containing the Project site. This regional area is largely undeveloped and provides abundant foraging opportunities for this raptor. As a result, the Draft EIR determined that the loss of approximately 6,416 acres of golden eagle foraging habitat would be considered an adverse impact, but not significant due to the amount of foraging habitat available regionally.[1821] For this reason, Project implementation is not expected to reduce the region's current carrying capacity for this species. Furthermore, the loss of foraging ground does not automatically equate to a reduction in the size of a population occurring in a region. Often, potentially suitable habitat is unoccupied. The results of surveys for many species listed in Table 5.7-8, Special Status Wildlife Species, beginning on page 5.7-89, were negative regardless of the fact that potentially suitable habitat is present on the Project site. Carrying capacity is based on a maximum fulfillment of potentially suitable habitat scenario, which is rarely realized at any given time for a population in a region.[1822] Species population sizes are typically continuously in flux as individuals' home ranges, foraging areas, and or nesting areas expand and retract in response to a wide range of changing habitat conditions related to seasons, weather, prey availability, etc. Like most wildlife species, the population size of golden eagle in the region is dynamic and varies from year to year, season to season, and so on. This variation occurs naturally within most wildlife populations. Consequently, it cannot be

[1819] Zeiner, D.C., W.F. Laudenslayer Jr., K.E. Mayer, M. White (Eds). 1990. *California's Wildlife Vol. 3: Mammals.* Sacramento, CA: CDFG, The Resources Agency.

[1820] Allen, L. W., Garrett, K. L., Wimer, M. C. 2016 (June). *Los Angeles County Breeding Bird Atlas.* Los Angeles: Los Angeles Audubon Society.

[1821] DRP 2017, p. 5.7-150

[1822] Wikipedia contributors. 2017 (October 30, last edited). Carrying capacity. *Wikipedia, The Free Encyclopedia*. https://en.wikipedia.org/wiki/Carrying_capacity.

assumed that the loss of a relatively small percentage of habitat supporting the regional population of golden eagle will automatically result in the loss of a breeding pair in the overall region and a reduction in carrying capacity. Furthermore, "take" as defined by Fish and Game Code is to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.[1823] Project implementation, inclusive of permanent loss of habitat, is not expected to result in any action that would meet the definition of "take" for California Fully Protected Species. As such, the Draft EIR adequately assesses and determines that no "take" of golden eagle would occur. Also see response to Comment F.8-149 for further discussion on the concept of carrying capacity.

Potential indirect impacts on golden eagle, such as electrocution and collisions, are not expected to occur. MM 7-6 includes the following language, "All surfaces on new antennae and phone/utility towers shall be designed and operated with anti-perching devices in conformance with Avian Power Line Interaction Committee standards to deter California condors and other raptors from perching".[1824] Furthermore, the Project site does not propose any structures (such as wind energy) that would potentially increase collisions for golden eagle. In order to minimize impacts on native wildlife, including golden eagle, modifications to MM 7-15 on page 5.7-191 shall be made to ban the use of rodenticides on the Project site as follows:

> The Homeowners Association shall supply an educational pamphlet to future residents of the Project site regarding: the importance of not feeding wildlife; information stating that trash (containing food) and microtrash that could potentially attract condors should not be accessible to wildlife; the necessity of keeping the ground free of fallen fruit from trees; and instructions about not leaving pet food outside. Additionally, in order to minimize impacts on native wildlife, the use of rodenticides on the Project site shall be prohibited.

Response to Comment F.8-144A:

The referenced document presents an updated study on population and sustainable take levels in the United States for bald and golden eagles. The causes of mortality discussed in this document, poisoning, collisions, and electrocution and starvation, were analyzed in the Draft EIR and not expected to occur as a result of Project development. See response to Comment F.8-144.

Response to Comment F.8-145:

The Draft EIR includes mitigation intended to prevent "take" of golden eagle. In addition, the MM 7-8 will be further modified to be more restrictive to add additional protection of golden eagle nests.

[1823] Fish and Game Code, No. 86
[1824] DRP 2017, p. 5.7-176

Based on this comment, MM 7-8 on page 5.7-179 of the Draft EIR is hereby replaced in its entirety with the following:

> The Project Biologist shall conduct pre-construction nesting bird surveys no earlier than seven days prior to any Project-related construction/ground disturbance activities within each construction area and a 500-foot buffer that occurs during the nesting/breeding season of special-status bird species potentially nesting on the site, with the exception of the special-status bird species addressed under separate subheadings below (including burrowing owl, golden eagle, and Swainson's hawk). The pre-construction surveys shall be conducted between January 1 and September 15, or as determined by the Project Biologist. If construction activities are delayed for more than 14 consecutive days, the surveys shall be repeated.
>
> The purpose of the pre-construction nesting bird surveys will be to determine whether occupied nests are present in the disturbance zone or within 500 feet of the disturbance zone boundary.
>
> If occupied nests are found, then limits of construction to avoid occupied nests shall be established by the Project Biologist in the field with flagging, fencing, fencing, or other appropriate barriers. The following minimum no-disturbance buffers will be required: 250 feet around active non-listed passerine nests and 500 feet around active non-listed raptor nests. Construction personnel shall be instructed on the sensitivity of nest areas. Project-related activities will not occur within the no-disturbance buffers. The Project Biologist shall serve as a construction monitor during those periods when construction activities are to occur near active nest areas to avoid inadvertent impacts to these nests. The Project Biologist may adjust the 250-foot or 500-foot setback at his or her discretion depending on the species, the behavioral baseline conditions determined through passive monitoring, and the location of the nest (e.g., if the nest is well-protected in an area buffered by dense vegetation). Once a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, construction may proceed in the setback areas. Monitoring reports shall include information regarding active nests and status of nests.

Please see response to Comment F.8-144.

Response to Comment F.8-145A:

The referenced article is presented as evidence that human disturbances can affect breeding golden eagles, even at a great distance. The article presents various recommended temporal and spatial buffer distances for golden eagles and concludes that the buffer sizes and timing should be site-specific. As stated in response to Comment F.8-145, the Draft EIR has been modified in MM 7-8 to clarify any raptor nest buffer (inclusive of golden eagles) shall be determined by the biologist, and shall be the appropriate size for avoiding disturbances, therefore avoiding take of any fully protected nest.

Response to Comment F.8-145B:

The referenced article studied cliff nesting golden eagles in the Phantom Canyon Preserve and used Geographic Information Systems to map the viewsheds (line of site) of six golden eagle nests. The standard 333-meter radius circular buffer was overlaid on the viewshed map. Inference by the Commenter that this method must be employed to avoid any disturbance to the nesting birds is unfounded. As stated in response to Comment F.8-145, MM 7-8 in the Draft EIR has been modified to clarify that any raptor nest buffer (inclusive of golden eagles) shall be determined by the biologist, and shall be the appropriate size for avoiding disturbances, therefore avoiding take of any fully protected nest.

Response to Comment F.8-145C:

The referenced article studied the effect of windfarms on golden eagles in Scotland. The Commenter presents the article as evidence that golden eagles avoid industrial areas within their territory. As stated on page 38 of the article, although the eagles avoided the windfarms (reason unknown), occupancy did not change and no real shift in the location of the core areas was observed. A direct comparison of golden eagle behavior patterns in relation to wind farms (with moving turbines) and a housing development cannot be made.

Response to Comment F.8-146:

The discussion of bald eagle utilization of the site is on the bottom of page 5.7-120 and the top of page 5.7-121 of the Draft EIR, and states that the bald eagle has not been observed on site. Page 5.7-148 of the Draft EIR states that Quail Lake, located off-site, provides suitable foraging habitat for the bald eagle where it has occasionally been observed. The discussion goes on to state that trees in the surrounding area provide potentially suitable nest sites for the bald eagle, but nesting at this location has not yet been documented. The lack of observations on site, the infrequent detections of this species adjacent to the site, and the lack of any known nesting in the area, as outlined in the Draft EIR, attests to the limited utilization of the Project area by bald eagle. Further corroboration is provided in the recent publication regarding the breeding birds of Los Angeles County which described bald eagles as rare migrants and winter visitors in the Project area from November to April, and mostly occurring around the larger lakes in the northwest part of the county.[1825] In fact, prior to the 2016-2017 breeding season, when a pair of bald eagles successfully nested in the San Gabriel Mountains, approximately 65 miles southwest of the Project site, bald eagles had not been detected nesting on the mainland in Los Angeles County since 1930.[1826] This supplemental information further demonstrates the extremely limited use of the Project area by bald eagle.

In regard to a quantification of suitable foraging habitat impacted by the Project, the Draft EIR provides several points within the bald eagle discussions describing the habitat. Page 5.7-121 of the Draft EIR states that potentially suitable foraging habitat occurs just off the site at Quail Lake and along the California Aqueduct. Page 5.7-120 mentions that bald eagles frequent estuaries, large lakes, reservoirs, major rivers, and some seacoast habitats.

[1825] Allen et al. 2016
[1826] *Ibid.*

Further discussion on page 5.7-120 states that fish are the major component of bald eagle diet, but waterfowl, gulls, and carrion are also eaten. The Draft EIR also discusses the presence of fish resources on and adjacent to the site, on page 5.7-48, explaining that because most watercourses in the area are ephemeral and infiltrate into sandy desert soils on and east of the Project site, fish habitat is extremely limited and only the most ubiquitous and tolerant fish species, such as the non-native mosquito fish (*Gambusia affinis*), are expected to occur. No stocked fish have been reported in the Project site. Common freshwater fish are present in adjacent off-site areas, such as Quail Lake and the Aqueduct; according to the DWR, Quail Lake contains striped bass (*Morone saxatilis*), channel catfish (*Ictalurus punctatus*), blackfish (*Orthodon microlepidotus*), tule perch (*Hysterocarpus traski*), threadfin shad (*Dorosoma petenense*), and hitch (*Lavinia exilicauda*).[1827] Although bald eagle may occasionally forage away from aquatic sources, clearly the preferred and primary foraging habitat type does not occur on the Project site. It is only due to the proximity to Quail Lake, and the California aqueduct to a lesser degree, that the bald eagle may potentially occur on site for foraging. From the information provided in the Draft EIR, it can be clearly deduced that there is no preferred foraging habitat on the Project site for bald eagle. Page 5.7-98, Table 5.7-8, specifies that this species occasional forages in rangelands and page 5.7-120 mentions occasional foraging on carrion as mentioned above. Foraging habitat on the Project site is thereby limited to rangelands adjacent to the primary foraging habitat of Quail Lake. A strict quantification of the foraging habitat impacted by the Project is unnecessary because the impact assessment provided on page 5.7-148 of the Draft EIR concludes the lack of an impact based on the complete lack of use of the Project site's potentially suitable habitat, as demonstrated through the Draft EIR's discussions of this species. In other words, the acreage of habitat potentially suitable for foraging on the site could be considered all foraging lands or grasslands, however, none of the habitat is expected to be used based on site surveys and historic evidence of the absence of this species in the Project area.

In regard to a quantification of suitable nesting habitat impacted by the Project, the Draft EIR provides a similar set of points within the bald eagle discussions. Page 5.7-120 of the Draft EIR states that bald eagles usually nest in trees near water, but are known to nest on cliffs. Page 5.7-121 of the Draft EIR states that due to the proximity of potentially suitable foraging habitat just off the site at Quail Lake and along the California Aqueduct, the bald eagle may potentially nest in trees on the site. Page 5.7-148 of the Draft EIR also mentions that trees in the area surrounding Quail Lake provide potentially suitable nests sites for the bald eagle, but goes on to state that nesting at Quail Lake has never been documented. The vegetation map shown in Exhibit 5.7-1, as well as the tree impact map of Exhibit 5.7-14 clearly show trees that would be impacted by the project. Proximate to Quail Lake, tree impacts (including temporary construction-period impacts) are limited to 50 trees within 3.55 acres of woodland located approximately one-quarter mile northwest of the lake, which can be deduced to be the only potentially suitable nesting habitat on the Project site. However, these trees would be highly unlikely to be utilized by nesting bald eagle given the large number of riparian trees which occur much closer to the lake along its shoreline. Further, summarizing the occurrence record, this species has not been detected nesting on the Project site over the

[1827] California Department of Water Resources, Public Affairs (DWR, Public Affairs). 2009. State Water Project Recreation Sites: Quail Lake. Sacramento, CA: DWR, Public Affairs.

course of many years of various surveys, described in Table 5.7-8, and has never been recorded nesting at Quail Lake or in the Project region and is considered extirpated from breeding in the Project region. Page 5.7-121 of the Draft EIR states that the success of any potential future breeding at Quail Lake would be dependent on the quality of the foraging opportunities provided by available aquatic habitats regardless, to some degree, of adjacent upland habitats. The Draft EIR definition of suitable nesting habitat, with detailed vegetation and tree impact quantities, provides for an adequate understanding of potential Project impacts to bald eagle nesting habitat.

The comment that the Draft EIR determines that the Project is not expected to have any impact to golden eagle is incorrect. The Draft EIR clearly states on page 5.7-150 that that the loss of approximately 6,416 acres of foraging habitat for golden eagle would be considered an adverse impact. The discussion goes on to state the impact would be considered less than significant, and this determination is based on the small amount of lost foraging habitat relative to the extensive amount of foraging habitat available regionally. Additionally, as mentioned on page 5.4-150 of the Draft EIR, this species has not been detected nesting on the Project site despite the many years of various surveys conducted, as listed in Table 5.7-8[1828]. Similarly, the comment that the Draft EIR relies on MM 7-6[1829] instead of providing an explanation is incorrect as shown above. However, the Draft EIR does rely on MM 7-8[1830] to prevent Project impacts on nesting golden eagle among other species in the unlikely event a breeding pair is present on the site in the future. Page 5.4-150 of the Draft EIR states that nests of golden eagle, and other species, would be protected by the Migratory Bird Treaty Act (MBTA). Therefore, MM 7-8, described on pages 5.7-179 and 5.7-180, is included to protect nesting birds during construction. This measure is an industry standard and requires surveys prior to commencing Project construction activities within the nesting bird season and requires no disturbance buffers to ensure bird nesting is able to proceed until an identified nest is no longer active. This measure also ensures adherence with the MBTA as well as Fish and Game Code protecting nesting birds and raptors.

The comment also states that MM 7-6 fails to address impacts to which bald eagle are vulnerable. The statement is true; however, MM 7-6 is a California condor-specific measure. This measure is not intended to address golden eagle, bald eagle, or any species other than the California condor. MM 7-8 addresses the potentially nesting golden eagle, potentially nesting bald eagle, among other potentially nesting avian species. However, it is worth noting that the specific impact types the comment describes as missing from this measure, including poisoning, electrocution, and collisions, are reduced within revisions to the Draft EIR as part of response to comments.

Also, in order to provide consistency and clarity regarding the analysis of bald eagles, the following text on page 5.7-148, in Section 5.7.6, Environmental Impacts, of the Draft EIR is hereby revised as follows:

1828 DRP 2017, p. 5.7-89
1829 *Id.,* p. 5.7-177
1830 *Ibid.*

~~All~~ Most adult California condors are wing-tagged and many are fitted with radio transmitters. ~~These birds have~~ The condor has been documented flying high over the area (with one reported landing), but foraging and breeding activities are conducted elsewhere and not on or in the vicinity of the Project site (Bloom 2009; BonTerra Psomas 2015d). Therefore, Project implementation is not expected to result in ~~any~~ impacts on the condor ~~these two species~~ and no mitigation is required. MM 7-6 is included to further ensure that the proposed Project does not result in future impacts on the California condor. The bald eagle may occur infrequently for foraging, and marginal breeding habitat occurs on-site or adjacent to Quail Lake. Due to the limited use expected, and available foraging habitat at Quail Lake, impacts to foraging habitat would be considered adverse but less than significant per State CEQA Guidelines. Potential breeding sites are located outside the impact area and direct impacts to breeding bald eagles are not expected to occur; however, MM 7-8 is provided to ensure no direct impacts occur.

Response to Comment F.8-147:

The Draft EIR clearly mentions avoidance of nesting raptors and other birds, which includes bald eagle, in MM 7-8 on pages 5.7-179 and 5.7-180. This measure is also specifically referred to in the bald eagle impact discussion on page 5.7-148. Many site-specific factors can influence the distance of appropriate buffers for any nesting bird. However, any disturbance that might result in failure of a nesting is outlawed. Therefore, the most appropriate approach, and by far the most commonly used, is for an on-site biologist to develop an appropriate buffer for each specific scenario to ensure no impacts to nesting birds. The Commenter's suggested buffer distances could be applied if determined to be appropriate at the time of occurrence in the future, but should not be pre-determined as a blanket buffer to fit all scenarios. In fact, the biologist may determine buffer distances greater than those suggested is appropriate in a particular scenario and would therefore be applied. Non-breeding buffers are not required based on the determination of less than signification impacts resulting from the highly unlikely potential for occurrence due to lack of primary foraging habitat on site and no observations on site as described in the impact assessment on page 5.7-148. In addition, the majority of the Project footprint, and thereby the majority of disturbances from the project occur at distances of greater than 600 meters from Quail Lake. Consequently, a management zone buffering the primary suitable foraging and nesting locations adjacent to the site, similar to that suggested, has been established within the Project design. The only exceptions include a road to the west that is expected to have infrequent truck traffic (i.e. National Cement Plant Road) and a proposed community park to the east that is expected to have minimal disturbances.

Additionally, and as stated in response to Comment F.8-145, MM 7-8 has been modified to include additional protection measures to further ensure the protection of nesting raptors and other nesting birds.

Response to Comment F.8-147A:

The footnote refers to two studies regarding bald eagles and raptors in general and their sensitivity to disturbance. The studies show a range of disturbances dependent on a variety of factors. All of the bald eagle areas analyzed are open water features such as rivers due to their prevalence to forage predominantly at these features. The Project is consistent with the idea of buffers as large as 750 feet as can been seen in the Project design surrounding Quail lake. Buffers around the lake are greater than 1,000 feet for nearly the entire circumference of the lake. In addition, implementation MM 7-8[1831] provides complete avoidance of impacts to nesting birds consistent with the Migratory Bird Treaty Act mentioned in the comment. Also see response to Comment F.8-147.

Response to Comment F.8-147B:

The referenced document is noted for the record. It is referenced in Comment F.8-147 to support an assertion regarding appropriate management zones for non-breeding bald eagle roosting sites. As noted in response to Comment F.8-147, non-breeding buffers are not required based on the determination of less than signification impacts resulting from the highly unlikely potential for occurrence due to lack of primary foraging habitat on site and no observations on site as described in the impact assessment on page 5.7-148. Please see F.8-147 for further discussion.

Response to Comment F.8-148:

As described in response to Comment F.8-146 and discussed in the Draft EIR on pages 5.7-120 and 5.7-121, the lack of observations on site, the infrequent detections of this species adjacent to the site, and the lack of any known nesting in the area outlined in the Draft EIR attest to the limited utilization of the Project area by bald eagle. The Draft EIR goes on to explain that impacts would be considered highly unlikely as a result of the rareness in the region. Direct impacts to bald eagle or impacts to recently occupied habitat would violate the Golden Eagle Protection Act; however, Project impacts on this species are not expected, and implementation of MM 7-8[1832] furthers verifies that the potential impacts do not occur consist with the requirements of the Golden Eagle Protection Act.

Response to Comment F.8-149:

No "take" of a white-tailed kite, a California fully protected species, is anticipated with implementation of the Project.[1833] The loss of foraging ground does not automatically equate to a reduction in the size of a population occurring in a region. Often, potentially suitable habitat is unoccupied. The results of surveys for many species listed in Table 5.7-8, Special Status Wildlife Species, beginning on Draft EIR page 5.7-89, were negative regardless of the fact that potentially suitable habitat is present on the Project site. Carrying capacity is based on a maximum fulfillment of potentially suitable habitat scenario, which is rarely realized at

1831 DRP 2017, p. 5.7-179
1832 *Id.,* p. 5.7-179
1833 *Id.,* p. 5.7-150

any given time for a population in a region.[1834] Species population sizes are typically continuously in flux as individuals' home ranges, foraging areas, and or nesting areas expand and retract into different potentially suitable habitat areas. Like most wildlife species, the population size of white-tailed kite in the region is dynamic and varies from year to year, season to season, and so on. This variation occurs naturally within most wildlife populations. Consequently, it cannot be assumed that the loss of a relatively small percentage of habitat of the regional population of white-tailed kite will automatically result in the loss of a breeding pair in the overall region and a reduction in carrying capacity. An additional example can be found in the Draft EIR on page 5.7-117, which describes increases in the regional population of Swainson's hawks. Recent surveys suggest that this species is recolonizing portions of its historic range in the Antelope Valley.[1835] In addition, recent surveys in 2008, 2009, and 2010 in the western Antelope Valley, east of the Project region, have found nesting Swainson's hawks at new sites.[1836] Habitat for this species, and presumably carrying capacity, has been reduced over the past 100 years as development has spread, but the Swainson's hawk population has been shown to be increasing in the Antelope Valley. Clearly there are a large number of factors which contribute to a population's size at any given time and loss of a relatively small percentage of that population's habitat cannot be assumed to have an automatic specific effect on one or more individuals, a pair, or a pair's ability to reproduce and subsequently effect the population size. Furthermore, "take" as defined by the USFWS is to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct[1837] and by CDFW as to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.[1838,1839] Project implementation, inclusive of permanent loss of habitat, is not expected to have any results that would meet the definition of "take" by USFWS or California terms. As such, the Draft EIR adequately assesses and determines that no "take" of white-tailed kite would occur.

Response to Comment F.8-150:

Swainson's hawks migrating through the Project area occasionally stop to forage, which is the explanation for the note on foraging. The Draft EIR states that the Swainson's hawk is expected to occur on-site for foraging, but is not expected to occur on-site for nesting.[1840] The Commenter's conclusion that Swainson's hawk populations in Antelope Valley are decreasing based on the use of more land for renewable energy generation and the fallowing of formerly irrigated agricultural lands related to water supply or other factors is noted.

1834 See https://en.wikipedia.org/wiki/Carrying_capacity.

1835 California Department of Fish and Wildlife (CDFW). 2015. California Natural Diversity Database. Records of Occurrence for the USGS Grapevine, Pastoria Creek, Winters Ridge, Liebre Twins, Frazier Mountain, Lebec, La Liebre Ranch, Neenach School, Alamo Mountain, Black Mountain, Liebre Mountain, and Burnt Peak, California 7.5-minute quadrangle maps. Sacramento, CA: CDFG, Natural Heritage Division.

1836 California Energy Commission and California Department of Fish and Game (CEC and CDFG). 2010 (June). *Swainson's Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Energy Projects in the Antelope Valley of Los Angeles and Kern Counties, California.* Sacramento, CA: CDFG.

1837 16 U.S.C., §1532 [19]

1838 Fish and Game Code, No. 86

1839 DRP 2017, pp. 5.7-3 and -5

1840 DRP 2017, p. 5.7-116

Response to Comment F.8-150A:

This comment is a duplicate of Comment F.8-150; please see response to Comment F.8-150.

Response to Comment F.8-151:

Although marginally suitable breeding habitat occurs on-site, this species is not known to breed in the Project region and due to lack of observed breeding during multiple protocol breeding season surveys, Swainson's hawk is not expected to occur for breeding on the Project site. In order to provide clarity, the third full sentence on the top of page 5.7-149 in Section 5.7.6, Environmental Impacts, of the Draft EIR has been revised as follows:

> The primary threat to this species is the loss of breeding habitats, which are not present on the Project site; therefore, these impacts are considered adverse but less than significant and no mitigation is required. As with other migratory birds, however, this species may occur as a breeder in the future and MM 7-2 is included to conduct pre-construction protocol surveys for the Swainson's hawk to confirm absence prior to disturbance.

In response to comments, additional detail has been added to MM 7-2 regarding pre-construction surveys and measures (see response to Comment B.4-26).

In review of the Draft EIR data supporting the Swainson's hawk discussion on pages 5.7-115 and 5.7-116 of the Draft EIR, the following revision is hereby made to the third sentence of the first full paragraph on page 5.7-116 to clarify the statement and reference:

> ~~Unpublished data from Pete Bloom and Woodridge (2004) indicates that there has been recent recolonization of historic habitats in the Antelope Valley and population increases in the Owens Valley.~~ Recent surveys have suggested this species is recolonizing portions of its historic range in the Antelope (CDFW 2016b).

In response to this comment, the following document is added to the administrative record:

California Department of Fish and Wildlife (CDFW). 2016b. Five-Year Status Review: Swainson's Hawk (*Buteo swainsoni*) in California. Sacramento, CA: CDFW. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=133622&inline.

Response to Comment F.8-152:

In preparation of the Draft EIR, all California species were assessed.[1841] Species without clear potential to occur based on habitat suitability and/or existing records are removed from further evaluation. The assessment of ring-tailed cat (or ringtail), in the region and on the site, is based on best available scientific information coupled with habitat assessments conducted by biologists traversing the site on multiple occasions searching for potentially suitable habitat elements and evidence of occupation of any and all wildlife species. The

[1841] *Id.,* pp. 5.7-18 to -50

determination not to include ringtail is based predominantly on known range and distribution and habitat suitability. Based on these elements, species are often excluded and site surveys would not be necessary. However, in an effort to ensure ringtails are not directly impacted, a pre-construction survey and direction on how to proceed depending on the results will be added to the Draft EIR. MM 7-2, beginning on page 5.7-175, regarding pre-construction surveys will be modified by inserting the following text to the end of the measure in a new paragraph:

> Pre-construction surveys for the ring-tailed cat shall be conducted throughout the Project disturbance area in the appropriate season within the year prior to disturbance. If results are negative, Project activities will proceed without further restrictions in regard to this species. If detected, the applicant shall consult with CDFW and modify Project activities at that time to ensure complete avoidance and no take of ring-tailed cat will occur.

Response to Comment F.8-152A:

The cited document is acknowledged and will be provided as part of the record. The hyperlink provides the website location for the ring-tailed cat range data cited by the Commenter in Comment F.8-152. Please see response to Comment F.8-152.

Response to Comment F.8-153:

The willow flycatcher subspecies are State-listed as endangered; however, as noted on the CDFW Special Animals listing and noted on page 5.7-94 of the Draft EIR, the status is specific to nesting. Based on the subspecies distribution, only the southwestern willow flycatcher has potential to nest in the Project region. Therefore, only analysis of the nesting potential for the southwestern willow flycatcher is applicable regarding regulatory compliance on the Project site. Migrating birds that are in an area momentarily are typically not considered to "occupy" the site. In migration, suitable habitat becomes far more diverse and these birds can be seen in areas, such as chaparral, which considered non-suitable for nesting. The USFWS survey protocol itself is based on trying to determine occupation while breeding; therefore, surveys may note the observation of willow flycatchers during migration on many project sites, but the results of the focused surveys submitted to the USFWS do not conclude that the site is "occupied." On the contrary, such reports will routinely indicate that willow flycatcher was observed as a migrant and was not detected breeding and the site is therefore unoccupied. The industry standard is to consider these results negative. The statement that the site is not occupied by these species is accurate as well as the determination of less than significant impacts based on these results.

Response to Comment F.8-153A:

The footnote links to a CDFW California Natural Diversity Database of State & Federally Listed Endangered & Threatened Animals of California. The purpose of this database is to present the species name along with the listing (State or federally-Threatened or Endangered) and listing date. The CDFW Special Animals List is a more comprehensive document which tracks all animal taxa tracked by the CDFW's California Natural Diversity

Database (CNDDB), regardless of their legal or protection status. This document clearly shows the willow flycatcher species and subspecies' Endangered status applies when the bird is nesting. The willow flycatcher does not have "fully protected" status, which appears to be the Commenter's suggestion.

Response to Comment F.8-154:

Although the riparian bird species mentioned were surveyed for and determined not to occupy the Project site during the breeding season, there remains potential for this to change in the future. The statement in the Draft EIR that there may be future breeders on the site is accurate and the mitigation measure to conduct surveys for them, including western yellow-billed cuckoo, prior to construction provides a mechanism to ensure that these conditions remain the same.[1842] MM 7-5 is clarified to include western yellow-billed cuckoo:

> Within the year prior to, and within the appropriate season, focused surveys for the following special status species shall be repeated: arroyo toad, Tehachapi slender salamander, California red-legged frog (concurrent with two-striped garter snake and western pond turtle focused surveys), western spadefoot, mountain plover, southwestern willow flycatcher, western yellow-billed cuckoo, and least Bell's vireo. Surveys shall be conducted in accordance with the approved CDFW or U.S. Fish and Wildlife Species (USFWS) protocol for that species.

Due to the Project buildout schedule of approximately 20 years, it could possibly change, although the likelihood is typically reduced as more years and surveys continue to indicate negative results. The impact assessment presented in the Draft EIR is based on existing conditions, consistent with the State CEQA Guidelines, and currently the site is not occupied. Sites that are not occupied are assessed accordingly. If the site was to become occupied in the future, MM-17 provides additional protection. The following text is hereby added to the last paragraph of MM 7-17 on page 5.7-193 of the Draft EIR:

> Domestic cats shall be prohibited from free-roaming (i.e., be allowed outdoors), and shall be required to have a microchip. All dogs shall be required to be leashed while in the designated natural open space areas, and bags for removing pet excrement will be provided at trail entrances and other appropriate locations. In addition, all dogs and cats shall be required to be neutered or spayed; all dogs shall be required to have a microchip; and potential owners shall show evidence prior to entry into the Centennial Development, as required by Los Angeles County Code (Section 10.20.350). These restrictions/features and their purpose will be described within educational material and distributed to new homeowners and made available to all homeowners as needed.

[1842] DRP 2017, pp. 5.7-179, 180, MM 7-8

Additionally, the following text is hereby inserted in MM 7-17 following the first sentence in the first paragraph on pages 5.7-192 and 5.7-193:

> The program's educational materials shall discuss the presence of native animals (e.g., coyote, bobcat, and mountain lion), indicate that those native animals could prey on pets, indicate that no actions shall be taken against native animals should they prey on pets allowed outdoors, and indicate that pets must be leashed while using the designated trail system and/or in any areas within or adjacent to open space. The educational materials shall also discuss the impacts pets can have on native birds. Control of stray and feral cats and dogs will be conducted in open space areas on an as-needed basis. Feral cats and dogs may be trapped and deposited with the local Society for the Prevention of Cruelty to Animals or the Los Angeles County Department of Animal Control.

Response to Comment F.8-155:

The comment is noted. The County notes that on April 19, 2018, the California Fish and Game Commission authorized the listing of tricolored blackbird as a "threatened" species.[1843] However, it is noted that Candidate species are afforded the same legal protections as State-listed species. Therefore, consultation with CDFW will be required. The relevant analysis therefore remains the same under CEQA, and no mitigation measure updates are required. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-156:

The Draft EIR text referenced by the Commenter refers to potential Project impacts before implementation of any biological resources mitigation measures. With respect to foraging habitat, the Draft EIR indicated that loss of foraging habitat could interrupt breeding if both Quail Lake and the north pond were used for breeding at the same time. As noted above, it has been nine years since any tricolored blackbird were found at the north pond, the habitat has become severely degraded, and the area is not likely to become suitable in the future. The species routinely shifts breeding locations, and there are also existing suitable breeding locations within the Mitigation Preserve, so the likelihood that both areas will be used for breeding at the same time is extremely low. Nevertheless, MM 7-7 has been modified to require a ¼ mile setback during breeding season, which will protect the existing foraging habitat for that season during construction, and the land use adjacent to Quail Lake up to approximately ½ mile is almost entirely open space recreation and, therefore, will be permeable and available for foraging. Furthermore, MM 7-10 has been modified to preserve additional mitigation lands, which includes preservation and management of 15,258 acres of suitable foraging habitat for tricolored blackbird and the Mitigation Preserve includes 1.1 acres of existing breeding habitat. Finally, MM 7-12 will preserve and enhance riparian areas, which will provide more breeding habitat. Thus, with mitigation, there is sufficient foraging habitat to support the existing colonies in the Project vicinity and provide additional

[1843] FGC 2018; Nossaman 2018

breeding and foraging opportunities in the Mitigation Preserve. This preservation of breeding and foraging habitat in a diversity of areas allows for this wide forage ranging species to continue to persist in the region.

Therefore, the Draft EIR is hereby clarified with the following addition to the last full paragraph on page 5.7-149:

> Due to the shifting of tricolored blackbird nesting locations from year to year, a subset of two or three of the available nesting locations may represent the entire regional breeding population. A substantial reduction of foraging lands surrounding this subset of nesting locations could result in considerable reduction of nesting success. A review of the Quail Lake and the on-site colony subset identified a potential post-Project reduction of approximately 20 percent of potentially suitable foraging habitat at each location. In a given year, if these two areas were used for nesting, the reduced availability of suitable foraging land could result in substantial reduction in nesting success. However, the north pond has become unsuitable habitat, so the likelihood of its future use by tricolored blackbird is very low. Additionally, the species shifts breeding locations between sites, and there are also existing potentially suitable breeding locations within the Mitigation Preserve, so the likelihood that both areas will be used for breeding at the same time is extremely low. Nevertheless, MM 7-7 has been modified to require a ¼ mile setback during breeding season, which will protect the breeding colony for that season during construction. Furthermore, MM 7-10 has been modified to preserve additional mitigation lands, which includes preservation and management of 15,258 acres of suitable foraging habitat for tricolored blackbird and the Mitigation Preserve includes 1.1 acres of existing breeding habitat. Finally, MM 7-12 will preserve and enhance wetland areas, which will provide more breeding habitat. Thus, with mitigation, there is sufficient foraging habitat to support the existing colonies in the Project vicinity and provide additional breeding and foraging opportunities in the Mitigation Preserve. This preservation of breeding and foraging habitat in a diversity of areas allows for this wide forage ranging species to continue to persist in the region. Based on the revised MMs 7-7, 7-10, and 7-12, the impacts to foraging habitat are less than significant.

Response to Comment F.8-157:

The comment summarizes content of the Draft EIR.

Response to Comment F.8-158:

Please see response to Comment F.8-156. No additional enhancement is required, as MMs 7-10 and 7-12 will preserve 15,258 acres of tricolored blackbird foraging and breeding habitat. Accordingly, MM 7-7 to further respond to this concern and those mentioned in other comments, the following edits are hereby made to MM 7-7:

The Project shall incorporate avoidance and additional open space buffer features for each of the two ~~this~~ known tricolored blackbird nesting areas on and adjacent to the Project site ~~area~~. Permanent impacts will be restricted to a distance of 400 feet from the nesting area excluding small impact areas associated with infrastructure and utilities along SR-138 immediately south of Quail Lake. The nesting area will be delineated by a qualified Ornithologist based on all available data (three years of site-specific data shall be used). Temporary impacts (i.e., construction noise) within a ¼ mile ~~400 feet~~ of active nesting areas shall be restricted to the non-breeding season. The breeding season for this species shall be considered April 1 through July 1. The applicant shall consult with CDFW and may obtain an Incidental Take permit if determined appropriate.

~~The Project shall include enhancement, restoration, and/or preservation of potentially suitable tricolored blackbird breeding and foraging habitat. Potentially suitable areas for enhancement and preservation include lower Oso Canyon proximate to Cement Plant Road, as well as any other created water bodies as part of the Project Drainage Plan, where feasible. Enhancement factors shall include the creation of bulrush marsh habitat or other substrate known to support breeding tricolored blackbirds; a persistent nearby standing water during the breeding season; and available adjacent foraging habitat with an appropriate food source.~~

Response to Comment F.8-159:

The Draft EIR provides mitigation for impacts to the American badger, among other species, through implementation of MMs 7-2 and 7-3 described on pages 5.7-175 through 5.7-177, which require pre-construction surveys, biological monitoring during construction, and relocation of some species to areas outside Project's impact footprint. In review of the Commenter's request, MM 7-2 of the Draft EIR has been modified. These modifications, described in response to Comment B.4-29, provide greater detail regarding the preconstruction and avoidance steps to be implemented for the American badger. With these changes, direct impacts on badger individuals is entirely avoided through the use of clear den marking and buffer establishment. However, passive relocation is relied on in some sense because badgers that vacate dens or young that disperse from dens in the Project construction zone are expected to relocate within adjacent regional open space areas. As stated in the special status mammals impact analysis in the second paragraph of page 5.7-153, compared to the amount of suitable habitat available in the region, the loss of habitat resulting from Project implementation would be less than significant. As described on pages 5.7-126 of the Draft EIR, this species occupies a wide variety of habitats and ranges throughout the State, such as dry open stages of most shrub, forest, and herbaceous habitats with friable soils. Badgers are generally associated with treeless regions, prairies, park lands, and cold desert, as described on page 5.7-98 of the Draft EIR. These various habitat types constitute a large percentage of the Project region. Based on review of the California Department of Forestry and Fire Protection's Fire and Resource Assessment Program

(FRAP) most recent vegetation data for the region[1844], areas of likely suitability are in excess of 155,000 acres in the Project region. In addition, several vegetation studies, listed in Table 5.7-2 beginning on page 5.7-19 and provided as Appendix 5.7-B of the Draft EIR, and a review of the Mitigation Preserve lands (on- and off-site) presented in Appendix 5.7-C of the Draft EIR, demonstrate that the dominant vegetation types within these immediately adjacent lands to be preserved and beyond are consistent with the habitat requirements for the American badger, and contain more than 14,000 acres of grassland among other suitable vegetation types.[1845] Consequently, badgers that may relocate from the Project disturbance area into adjacent lands and beyond throughout the Project region are expected to encounter sufficient opportunity to persist in the region with others badgers of the regional population. In regard to "take" resulting passive relocation, the Draft EIR does not authorize any individual to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill American badger in accordance with Section 86 of the Fish and Game Code, and there is no evidence provided to suggest the contrary.

In response to this comment, the following document is added to the administrative record:

California Department of Forestry and Fire Protection (CAL FIRE). 2015 (Release date). Fire and Resource Assessment Program: FVEG. Sacramento, CA: CAL FIRE. http://frap.fire.ca.gov/data/frapgisdata-sw-fveg_download.

Response to Comment F.8-159A:

The document referred to in the footnote describes American badger morphology, subspecies, distribution, and ecology as well as home range size. The document shares a few studies of limited robustness such as studies estimating species home ranges based on tracking of a single individual. The document also mentions a large range in reported number of dens per hectare. However, in general, the document supports the Commenter's statement in Comment F.8-159 that it is feasible for several badgers could be displaced as result of Project implementation. Pages 5.7-98 and 5.7-126 of the Draft EIR acknowledges suitable habitat of the site and observations indicating site occupation. The impact analysis on page 5.7-153 of the Draft EIR states that the impacts to the species are potentially significant and that mitigation is required. The Draft EIR is consistent with the information presented in the referenced paper.

Response to Comment F.8-160:

There are no officially recognized focused survey protocols for either the silvery legless lizard or coast horned lizard. Determinations of presence or absence are typically based on range and habitat suitability, and these factors are sufficient for estimating site distribution and potential Project impacts accordingly. Focused surveys are not conducted for most species that are assessed for potential impacts, this is standard practice. Furthermore, the impacts of lost habitat do not only look at the acreage of impact in and of itself, but rather a

[1844] California Department of Forestry and Fire Protection (CAL FIRE). 2015 (Release date). Fire and Resource Assessment Program: FVEG. Sacramento, CA: CAL FIRE. http://frap.fire.ca.gov/data/frapgisdata-sw-fveg_download.
[1845] DRP 2017, p. 5.7-158, Table 5.7-12

comparison as to the percentage of the total regional population. This can be estimated by reviewing the description of preferred suitable habitat provided in Table 5.7-8 on Draft EIR pages 5.7-90 and 5.7-110. Habitat includes coastal dune, valley-foothill, chaparral, and coastal scrub habitats. Of these habitats, the site has valley-foothill but does not have any of the other preferred habitats.[1846] A review of an aerial photograph in combination with knowledge of the region presents an approximation of the regionally potentially suitable habitat. This establishes an understanding of the Project's effect on the sustainment of the regional population of this species. It is important to note that the assumption of 700 acres of potentially suitable habitat[1847] is conservative and assumes maximum occupation of all potentially suitable habitat. This is highly unlikely to be the case because potentially suitable habitat is often found to be unoccupied. Therefore, the impact assessment identifies the worst-case scenario for extent of impacts on this species. A refinement of this area following focused surveys would only reduce the impact. Based on these factors, the impacts to these species are considered less than significant.[1848] Implementation of MMs 7-2 through 7-4,[1849] which require avoidance of impacts outside disturbance limits, pre-construction surveys, and biological monitoring (including relocation of individuals from the Project's impact footprint, if detected) would further help these species.[1850] Lastly, it should be noted that incidental loss of individuals that go undetected and/or are unable to be captured and relocated represent a sustainable impact for regional populations. That is to say, the regional population of silvery legless lizards is likely to persist as such with both the permanent habitat loss as well as possible accidental loss of a number of individuals remains a relatively small impact compare to the regional habitat suitability.

Response to Comment F.8-161:

Proposed MMs 7-2 through 7-4 are intended as salvage activities to minimize direct loss. They are not intended to avoid all impacts and they are not required to reduce the impact because it was determined to be less than significant. Therefore, implementation of these measures, although potentially less than 100 percent effective, is a further reduction in impacts to this species. Please also refer to response to Comment F.8-160.

Response to Comment F.8-161A:

This comment is a footnote which refers to a 1991 study by C. Kenneth Dodd, Jr. and Richard A. Siegel which looked at the success of relocation and translocation programs for amphibians and reptiles. The authors also looked at reasons why the methods are a popular form of mitigation. In conclusion, a series of recommendations are provided to guide future relocation efforts. Primarily, prior to commencing with a relocation effort, the site should be studied, a plan prepared, and monitoring should be required. Proposed MMs 7-2 through 7-4 generally address these concerns and require approval of a plan prior to relocation efforts to provide greater assurances of success.

1846 *Id.,* p. 5.7-147
1847 *Ibid.*
1848 *Ibid.*
1849 *Id.,* p. 5.7-175 to -177
1850 *Id.,* p. 5.7-147

Response to Comment F.8-162:

As demonstrated by the avian species observed and documented in the Plant and Wildlife Compendium in Appendix 5.7-A of the Draft EIR, birds do use the Project site during migration. Project surveys identified specific parts of the Project site as particularly valuable to migrant birds. As a result, PDF 7-3[1851] was designed to protect these Project features and minimize potential impacts on migratory birds. The Draft EIR acknowledges the migration of common bird species through the Project site on page 5.7-49; and analyzes the migration of individual special status species through the Project site beginning on pages 5.7-112 through 5.7-124, and 5.7-148 through 5.7-151 of the Draft EIR. Quantifying the exact number of birds migrating through the Project site via point counts is not necessary, as the Draft EIR takes a conservative approach and assumes presence of migrating birds on the Project site for those that are known to utilize similar habitat types found on the Project site and that are known to migrate through the region. Baseline data was gathered during the previous nearly 20 years conducting biological surveys on the Project site and, and as noted above, resulting data is provided in the various wildlife compendia. Any potentially significant impacts to migrating birds are mitigated to a less than significant level via MM 7-8, which prevents impacts to nesting birds per the Migratory Bird Treaty Act; MM 7-2, which prevents impacts to Swainson's hawk and burrowing owl; and MM 7-5, which prevents impacts to mountain plover, southwestern willow flycatcher, western yellow-billed cuckoo, and least Bell's vireo. Additionally, the loss of roughly 7,000 acres of land impacted by the Project (rather than almost over 10,000 as stated in the comment) is offset by the approximately 5,624 acres of on-site open space (of which approximately 3,866 acres are designated as SEA 17, to be preserved in perpetuity within the site boundaries), and the approximately 39,213 acres of off-site open space acres that would be set aside for preservation as mitigation for impacts to biological resources, including migrating birds. Impacts to bats are also analyzed in the Draft EIR, and any potentially significant impacts are mitigated to a less than significant level through MM 7-9, which prevents impacts to roosting bats; MM 7-3 for biological monitoring during construction; MM 7-4 for clear demarcation of disturbance limits. In addition, please see responses to Comments F.8-144, F.8-145, and F.8-146.

Response to Comment F.8-163:

Single pairs or individual burrowing owls have been observed on or in the vicinity of the Project site during multiple bird surveys performed between March 2000 and July 2015.[1852] Focused burrowing owl surveys have also been conducted.[1853] Specifically, qualified wildlife biologists conducted protocol-level focused surveys for the western burrowing owl in 2003 and 2006.[1854] One pair was observed in the eastern portion of the site in 2001 and one pair was observed just off the site to the north in 2006 using an abandoned irrigation standpipe; this species was not detected on site since 2001.[1855] Additionally, as part of a comprehensive grassland quality survey conducted on the Project site in April 2006, a search for evidence

[1851] *Id.,* p. 5.7-139
[1852] *Id.,* p. 5.7-19 to -23, Table 5.7-2
[1853] *Id.,* Appendix 5.7-B, Birds-4; *Id.,* Appendix 5.7-B, Gen-6
[1854] *Id.,* p. 5.7-22, Table 5.7-2
[1855] *Id.,* p. 5.7-115

of burrowing owl presence on the site, as well as a habitat and occurrence record evaluation using geographic information system (GIS) databases and analytical tools, was conducted by Natural Resource Consultants (NRC). Through these methods, NRC determined that burrowing owls are likely to be present on the Project site but are locally distributed and uncommon. During at least 1,044 man-hours of fieldwork over three weeks, two individual burrowing owls were observed, both of which were slightly off-site to the east. NRC concluded that though grassland habitats preferred by burrowing owls are present on the site, burrowing owls are uncommon and/or locally distributed.[1856] The Project site is at the edge of the known range of the species as shown by the CDFW's California Wildlife Habitat Relationships Database.[1857] Although not focused protocol-level surveys for burrowing owl, the biologists conducting special status plant survey transects for the Project in 2015 and 2016 also searched for, but did not find, the burrowing owl or burrowing owl sign during the surveys. Suitable burrowing owl habitat consists of relatively short vegetation with only sparse shrubs and taller vegetation combined with the presence of burrows for roosting and nesting.[1858] In California, burrowing owls are largely dependent on California ground squirrels (*Spermophilus beecheyi*) to dig their burrows,[1859] although burrows from less common burrowing wildlife such as kit fox may also be used. The surveys have found the California ground squirrel, as well as kit fox or other suitably sized burrows, to be largely absent from the Project site; as a result, the Project site's grasslands lack suitable burrows for the burrowing owl and is generally unsuitable for that species. The Draft EIR ultimately uses a conservative approach by requiring specific burrowing owl mitigation. Also see response to Comment F.3-13.

In order to provide clarity, the following text is hereby inserted after the second paragraph of MM 7-2 on page 5.7-175 of the Draft EIR:

> Prior to issuance of grading or building permit, the Project Proponent shall conduct appropriate burrowing owl pre-construction surveys and avoidance and mitigation measures as identified below.
>
> *Burrowing Owl Pre-Construction Surveys*
>
> The project biologist shall conduct pre-construction take-avoidance surveys no more than 30 days prior to ground-disturbing activities within each construction area. Focused burrowing owl surveys shall be conducted in accordance with the CDFW Staff Report on Burrowing Owl Mitigation (March 2012). Breeding season surveys shall include at least four survey passes completed between February 15 and July 15, with at least one visit between February 15 and April 15, and a minimum of three survey visits (at least 3 weeks apart) between April 15 and July 15, including at least one visit after June 15. Non-breeding season surveys shall include at least four visits spread evenly throughout the non-breeding season. The surveys

1856 *Id.,* Appendix 5.7-B, Birds-4
1857 Zeiner, et al. 1990
1858 Gervalis et al. 2008
1859 *Ibid.*

shall be conducted in suitable burrowing owl habitat within 150 meters (492 feet) of the project footprint. Surveys shall be conducted by walking 20-meter transects. Because burrowing owls can recolonize a site after a few days, time lapses between project activities trigger subsequent take avoidance surveys, including, but not limited to an additional survey within 24 hours of ground-disturbing activities. Once surveys are completed, the project biologist shall prepare a survey report on the survey methods and results.

Burrowing Owl Avoidance and Mitigation Measures

Submit for DRP and CDFW approval and subsequently implement a Burrowing Owl Exclusion Plan, which includes four avoidance and relocation strategy tiers and associated mitigation requirements set forth in the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012): Tier 1 – Avoidance Buffers; Tier 2 – Passive Relocation; Tier 3 – Prevention of Recolonization of Development Areas; and Tier 4 – Active Relocation (Optional). Site monitoring shall be required prior to, during, and after exclusions of burrowing owls from their burrows. Excluded burrowing owls shall be monitored and documented using artificial or natural borrows on adjoining Mitigation Preserve lands or other open space.

Avoidance buffers shall be established in accordance with the buffer distances described in the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012), which range from 50 to 500 meters, depending on the season and level of disturbance. The buffers may be reduced, but only after consultation with and approval from CDFW.

In addition, the following paragraph in MM 7-2 on page 5.7-175 is hereby deleted:

~~Pre-construction burrowing owl and Swainson's hawk surveys shall be conducted in all potentially suitable habitat areas prior to initial site preparation. Methods employed shall be consistent with standard and appropriate protocols for both species within the appropriate season of the year prior to construction. Burrowing owl pre-construction surveys shall be conducted prior to the start of construction/ground-breaking activities. Surveys will be conducted following the California Department of Fish and Wildlife's (CDFW's) 2012 burrowing owl survey protocol. These surveys shall be conducted weekly beginning 30 days prior to the start of construction with the final survey occurring 1 day prior to construction.~~

Response to Comment F.8-163A:

Of the 94 total pairs of burrowing owl detected in the western Mojave Desert region during the referenced 2006-2007 study,[1860] most were clustered in the Antelope, Apple, and Lucerne Valleys, where agriculture and residential areas were more concentrated than elsewhere in this region. These results seem to compare favorably with the results of the Los Angeles County Breeding Bird Atlas that shows most burrowing owl pairs were situated around Lancaster and Palmdale.[1861] This breeding bird atlas project concluded that the Los Angeles County population of burrowing owls is probably less than 50 pairs. Based on these and other studies in the region, the distribution of burrowing owls in the region appears to be of a rather sparsely distributed species that concentrate in semi-colonial gatherings in areas that provide a combination of suitable foraging habitat with suitable nesting and roosting burrows. The Project site appears to provide the former, but not the latter. The information presented in the study is consistent with the Draft EIR analysis for this species. Also see response to Comment F.8-163.

Response to Comment F.8-164:

The Draft EIR assesses the presence and suitable habitat for northern harrier and loggerhead shrike;[1862] and includes the northern harrier and loggerhead shrike in the impact analysis.[1863] As discussed on page 5.7-150, "The golden eagle, northern harrier, and white-tailed kite have been observed foraging on the Project site, but nesting has not yet been documented on the Project site. Project implementation would result is the loss of approximately 6,416 acres of foraging habitat for these raptors that would be considered adverse, but less than significant. The potential exists for all three raptors to nest on the Project site. As golden eagle and white-tailed kite are California Fully Protected species, "take" would not be allowed. In addition, the nests of all three species would be protected by the Migratory Bird Treaty Act (MBTA). Therefore, MM 7-8 is included to protect nesting birds during construction." As discussed on page 5.7-151, "Small numbers of loggerhead shrikes have been observed year-round on the Project site. Although nesting has not yet been documented, this species is expected to breed on the Project site. Relative to numbers of this species elsewhere in the Antelope Valley, the Project site does not support a population that would be considered regionally important; therefore, the loss of approximately 460 acres of suitable habitat for this species would be considered adverse, but less than significant. The nests of this species would be protected by the MBTA; therefore, MM 7-8 is included for protection of nesting birds during construction."

1860 Wilkerson, R.L. and R.B. Siegel. 2011. Distribution and Abundance of Western Burrowing Owls (*Athene Cunicularia hypugaea*) in Southeastern California. *The Southwestern Naturalist*, 56(3):378-384. Southwestern Association of Naturalists.

1861 Allen, L.W., K.L. Garrett, and M.C. Wimer (Allen, et al.). 2016 (June 3). *Los Angeles County Breeding Bird Atlas*. Los Angeles, CA: Los Angeles Audubon Society.

1862 DRP 2017, p. 5.7-117 and -121

1863 *Id.,* p. 5.7-150 and -151

Response to Comment F.8-165:

The study results provided in the comment are acknowledged. The data presented is for the entirety of Tejon Ranch, which does not necessarily represent the Project site. Recent population distribution data received from Tejon Ranch shows a distribution concentrated north east of the project site within the Mitigation Preserve with much more infrequent occurrence on the Project site (see new Exhibit B.4-34). New exhibits are included in Section 3.0, Draft EIR Clarifications and Revisions, of this Final EIR. Furthermore, the on-site observations are largely within the on-site preserve area. These data are consistent with the Draft EIR analysis and the determination of less than significant impacts. In addition, as stated on page 5.7-153 of the Draft EIR, as part of the Ranch-wide Management Plan,[1864] which is an implementation tool of the Ranch-Wide Agreement, the Project Applicant will work with the Tejon Ranch Conservancy to identify and implement potential enhancement measures that are also supported by CDFW. Potential measures could focus on enhancing pronghorn fawn survivorship with GPS-tracking devices and other measures to evaluate and minimize losses from coyote predation; completing further evaluation of modeling tools at a site-specific level (such as those used on the Carrizo Plain), and incorporating volunteer involvement with supportive activities such as fencing retrofits.

Response to Comment F.8-165A:

The footnote refers to a study titled "*A literature review and analysis of pronghorn populations at Tejon Ranch, California*" authored by S. G. Kohlmann and J.D. Yoakum prepared for the Center for Biological Diversity. The study looked at the population of pronghorn on the southern slope of the Tehachapi range, which is the same population discussed in the Draft EIR on pages 5.7-127, 5.7-128, and 5.7-153. The facts of the pronghorn population found in the document are consistent with the Draft EIR discussion. The study goes on to describe the decline of the population and potential issues. As described on page 5.7-153, regardless of these circumstances, the Project's impact would be considered less than significant pursuant to CEQA. However, please note that as part of the Ranch-wide Management Plan,[1865] which is an implementation tool of the Ranch-Wide Agreement, the Project Applicant will work with the Tejon Ranch Conservancy to identify and implement potential enhancement measures that are also supported by CDFW. Potential measures could focus on enhancing pronghorn fawn survivorship with GPS-tracking devices and other measures to evaluate and minimize losses from coyote predation, completing further evaluation of modeling tools at a site-specific level (such as those used on the Carrizo Plain), and incorporating volunteer involvement with supportive activities such as fencing retrofits as described on page 5.7-153 of the Draft EIR. Also see response to Comment F.8-165.

Response to Comment F.8-166:

The Commenter's claim that Project implementation will likely extirpate the population of pronghorn occurring on Tejon Ranch is unfounded. The Project site represents a small fraction of the land that comprises Tejon Ranch. The data shows that Pronghorn do not

1864 Final EIR Appendix 5.7-D
1865 *Ibid.*

substantially use or rely on the Project site and preservation of the Mitigation Preserve and management of the grasslands in perpetuity consistent with the Ranch-wide Management Plan will benefit the pronghorn.

Response to Comment F.8-167:

Please see responses to Comments F.8-165 and F.8-166, above. In regard to the observations of pronghorn at the Poppy Preserve and Petersen Ranch, the occurrences, assuming they have been verified, can only be considered outliers at this time. Individuals of regional populations of wildlife species are sometimes found outside the known occurrence area. However, unless the occurrence is repeated, it is typically considered a single event and not evidence of a population trend or expanded distribution. Further evaluation on impacts to this species is unwarranted based on responses to Comments F.8-165 and F.8-166 and the existing evaluation in the Draft EIR.

Response to Comment F.8-168:

Please see pages 5.7-50 through 5.7-64 and 5.7-164 through 5.7-170 of the Draft EIR for an in-depth and adequate discussion of wildlife movement, which includes post-Project impact considerations, connectivity of different guilds, and a complete evaluation of the Project's impacts on wildlife movement. Please note that consideration is given to major movement deterrents in the Project area, including the SR-138 and the California Aqueduct, due to their substantial potential to prevent movement of some wildlife. Accordingly, passage points (some of which are bridges) are discussed at length.

Response to Comment F.8-169:

Please see response to Comment F.8-168 above.

Response to Comment F.8-170:

The Commenters' suggestion that the County is required to designate the Project site as a SEA is both meritless and time barred.

The six selection criteria from the County's General Plan do not list characteristics that compel the County to designate a particular area as a SEA. The criteria describe necessary prerequisites that *permit* the County to *exercise its discretion* to designate an area as a SEA. (See LACDRP 2015: "All of the County's SEAs and CRAs *must* satisfy at least one of the six SEA selection criteria" [emphasis added].[1866]) The fact that an area is eligible to be designated as a SEA does not mean that it must be so designated. Moreover, as the Commenters acknowledge, the Project site does not meet the first criterion used by the County in determining whether to designate a SEA: that the location is the "habitat of core populations of endangered or threatened plant or animal species."[1867]

[1866] LACDRP 2015, Appendix G, p. 52
[1867] *Ibid.*

It is well established that a legislative body's determinations under its General Plan are entitled to "great deference," because "the body which adopted the general plan policies in its legislative capacity has unique competence to interpret those policies when applying them in its adjudicatory capacity."[1868] In 2015, the County Board of Supervisors carefully applied the requirements and guidance of its General Plan when deciding which areas of the AVAP should be designated as SEAs. Ultimately, the Board of Supervisors designated 342,773 acres of SEA within the AVAP, adding "o*ver 200,000 new acres* of designated Significant Ecological Areas" as compared to the pre-2015 plan.[1869] At the same time that the Board "vastly expanded SEAs," the Board also decided not to designate an SEA in the West Economic Area in order to ensure that development would meet the AVAP's goal "to direct expected growth into the EOAs, the areas specifically designated for growth under the Rural Preservation Strategy."[1870] The Commenters cite no authority suggesting that, simply because an area meets some of the County's SEA selection criteria, the area must be designated as an SEA.

Regardless, the decision about whether the Project site should be designated as an SEA is no longer at issue. The determination that the Project site should not be designated as an SEA was final at least as of June 2015, when the Board of Supervisors approved the AVAP and decided not to designate the Project site as an SEA. No party filed any challenge contending that the Board was required to designate the Project site as an SEA, and neither did any party file any challenge contending that the lack of an SEA designation was inconsistent with the County's General Plan. The statute of limitations to bring any such challenge expired more than two years ago.[1871]

Commenter CBD, the only party to challenge to the County's approval of the AVAP, did *not* argue in its challenge that the County was required to designate the Project site as an SEA or that the County's failure to do so violated the County's General Plan or any other applicable law.[1872] As described in responses to Comments F.8-229 and F.8-233, CBD only challenged the County's CEQA compliance when approving the AVAP, and even CBD's CEQA challenge was extremely narrow, arguing only that the AVAP EIR and County approval findings failed to reflect certain relatively minor amendments the County Board of Supervisors made in June 2015 to the version of the AVAP presented to the Board in November 2014.[1873] As described in responses to Comments F.8-229 and F.8-233, in May 2017, the Los Angeles

1868 *Highway 68 Coalition v. Cty. of Monterey* (2017) 14 Cal.App.5th 833, 896 [quoting *Save Our Peninsula Cmte. v. Monterey Cty. Bd. of Supervisors*, (2001) 87 Cal.App.4th 99, 142]

1869 County of Los Angeles' Opposition to Opening Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles,* No. BS156932 (L.A. Cty. Sup. Ct. Dec. 12, 2016) ("County AVAP Br."), at pp. 1, 9 (emphasis in the original)

1870 *Id.*, pp. 2, 11

1871 Gov. Code §§ 65009(c)(1), 65860(b)

1872 Petition for Writ of Mandate, *Ctr. For Biological Diversity v. Cty. of Los Angeles,* No. BS156932 (L.A. Cty. Sup. Ct. July 16, 2015); Petitioner's Opening Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016) ("CBD AVAP Open. Br."); Petitioner's Statement of Issues, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Reply Brief, *Ctr. For Biological Diversity v. Cty. of Los Angeles*, No. No. BS156932 (L.A. Cty. Sup. Ct. Jan. 18, 2017) ("CBD AVAP Reply Br.")

1873 *Ibid.*

Superior Court rejected commenter CBD's narrow CEQA challenge, affirming the validity of the AVAP EIR.[1874]

In addition to being time-barred, any argument that the County is required to designate the Project site as an SEA is also barred by basic principles of res judicata. "Res judicata bars not only the reopening of the original controversy, but also subsequent litigation of all issues which were or *could have been* raised in the original suit" (citation omitted, emphasis added).[1875] Since commenter CBD could have made this argument in its challenge to the AVAP, and declined to do so, it will not be able to bring any subsequent action to make this claim.

Moreover, as described in response to Comment F.8-233, the Project site has been identified for development in several different previously approved plans, and in several different certified EIRs. Since no party challenged these plan adoptions or challenged any of these EIRs within the applicable statutes of limitations, the designation of the Project site for development is an issue that cannot now be challenged.

Response to Comment F.8-170A:

The content of this website, which summarizes certain County General Plan provisions regarding SEAs, is addressed in response to Comment F.8-170. Please refer to that response for additional information regarding the cited document's relevance to the Project and the Draft EIR.

Response to Comment F.8-170B:

The content of this website, which summarizes certain County General Plan provisions regarding SEAs, is addressed in response to Comment F.8-170. Please refer to that response for additional information regarding the cited document's relevance to the Project and the Draft EIR.

Response to Comment F.8-171:

The Commenter's opinion is noted but is contrary to the unanimous vote of the County Board of Supervisors in approving the Antelope Valley Area Plan. For additional information on this issue, please see response to Comment F.8-170.

Response to Comment F.8-172:

The Regional Conservation Investment Strategy (RCIS) program referenced by the Commenter is a pilot program authorized by Assembly Bill 2087 (2016).

[1874] AVAP Ruling
[1875] *Thompson v. Ioane* (2017) 11 Cal. App. 5th 1180, 1191

Background on RCIS Program. The Legislature expressly described the purpose of this program in Section 1850 of the California Fish and Game Code, which provides in pertinent part:

> It is . . . the policy of the state to encourage voluntary conservation mechanisms to **identify and implement advance mitigation actions** that do all of the following:
>
> (1) Can be used to compensate for project impacts, including, but not limited to, infrastructure and renewable energy projects, more efficiently.
>
> (2) Are effective ecologically.
>
> (3) Will help to conserve regionally important biological and other ecological resources.
>
> It is . . . the intent of the Legislature to create nonregulatory mechanisms to guide investments in conservation, infrastructure, and compensatory mitigation for impacts to natural resources, including impacts to threatened and endangered species, other sensitive species, natural communities, ecological processes, and connectivity.
>
> In enacting this chapter, **it is not the intent of the Legislature to regulate the use of land, establish land use designations, or to affect, limit, or restrict the land use authority of any public agency**.
>
> (Fish & Game Code Section 1850(c)-(e), emphasis added.)

In Guidance issued by the California Department of Fish and Wildlife (CDFW), the program's purpose was summarized, in its entirety, as follows:

> - Achieve more **strategic, effective conservation**
> - Promote resiliency to climate change & other pressures
> - Support infrastructure & other projects with **efficient mitigation delivery**
>
> (RCIS Program Guidelines Public Presentation[1876], emphasis added.)

The RCIS legislation mandates the contents of a RCIS plan, which includes but is not limited to the requirement that the RCIS plan "**account for reasonably foreseeable development** of major infrastructure facilities, including, but not limited to, renewable energy and housing." The RCIS plan must also "include provisions **ensuring that the strategy will be in compliance with all applicable** state and **local requirements** and does not preempt the authority of local agencies to implement infrastructure and urban development in local

[1876] RCIS Program Guidelines Public Presentation (June 21, 2017), PDF available at https://www.wildlife.ca.gov/Conservation/Planning/Regional-Conservation.

general plans." (emphasis added).[1877] The RCIS plan must be developed "in consultation with local agencies that have land use authority."[1878] A draft RCIS plan must be submitted to CDFW for initial review, a revised version that adequately addresses CDFW's comments must then be prepared and made available for public review, and following public review the final version must be submitted to and may be approved by CDFW.[1879]

Antelope Valley RCIS Pilot. The process to prepare the Antelope Valley RCIS pilot (AV RCIS) began in 2016 and resulted in the publication of an "administrative draft" AV RCIS in June of 2017 (June Admin Draft).

The County was involved with the AV RCIS as a member of the Steering Committee and submitted extensive comments and requested changes for the June 2017 Admin Draft, which had been circulated for internal review. Additional comments and concerns were submitted regarding the inaccuracies within the biological descriptions, the need to hire a botanist familiar with the native vegetation of the Antelope Valley and its compatibility with the recently adopted Antelope Valley Area Plan (AVAP). The County is no longer a member of the AV RCIS Steering Committee and continues to be concerned with regards to the adequacy of the document both in its scientific integrity as well as in meeting the intent of the RCIS legislation.

Regarding June Admin Draft being "Best Available Science". The comment that the Draft EIR needs to be revised and recirculated to "incorporate the results of the RCIS process" is noted.

As mentioned above, the County had concerns about the biological information that was provided in the Admin Draft and requested that they be addressed prior to submitting the document to CDFW. To date, the County believes that those concerns have not been addressed as the AVRCIS appears to be on hold.

The June Admin draft explains that a "map-based Environmental Evaluation Modeling System (EEMS)[1880] was used to generate the biological value model results." The draft report goes on to explain that "[t]he biological value model was developed interactively with stakeholder involvement, where input from stakeholders and local experts could be dynamically changed, resulting in a transparent and nimble modeling process." It was not clear from the habitat descriptions provided what characteristics were used for modeling the potential suitability of habitat for focal species, and County Biologists had expressed concerns with the adequacy of some of the habitat descriptions that appeared to be pulled from other parts of the state or country, and not specific to known conditions within the region or County. The draft report directs the reader to two Appendices, F and G, for an explanation of the methodology used to rank the biological value of lands within the AV RCIS area.[1881] Appendix F includes maps of modeled distribution of the focal species, and Appendix G, which should have provided details of the modeling methodology, is missing.

[1877] Fish & Game (F&G) Code § 1853(c)(7-8)
[1878] *Id.,* § 1853(e)
[1879] *Id.,* § 1854
[1880] Sheehan 2016
[1881] June Admin Draft, p. 3-3

Appendix G reads in its entirety: "Description of Modeling Methodology to be provided."[1882] The missing modeling methodology was in turn used to generate the draft report's conclusions and figures about the biological resource values of the Centennial project site and other Antelope Valley lands. A detailed response cannot be provided to missing modeling methodology, which precludes the ability for the lead agency to evaluate its legitimacy.

The Draft EIR does, however, include an assessment of the three biological resource values identified by the Commenter as relevant in the June Admin Draft. With respect to the June Admin Draft's designation of the project site as a habitat core area called "Western Antelope Valley", for example, the designation encompasses nearly all of the Centennial Project site. The Draft EIR includes all biological resources, inclusive of the three species groups (desert, agriculture/grassland, and foothill/riparian) included in the June Admin Draft, were in fact studied and documented in regard to their occurrence on the Project site. Subsequent analysis reviewed the impacts of the Centennial project accordingly. The Project site in the Draft EIR, however, was not separated as distinctly named "unit" of land as was the case with the June Admin Draft; instead, the biological resource values on the Project site were considered as part of the mosaic of habitat areas in the region, which vary in quality and connectivity throughout. It should be noted that the Project region, in regard to the biological resources evaluation in the Draft EIR, did not truncate at the Los Angeles County boundary but continued northward into Kern County and up to the Tehachapi Mountains ridgeline. As such, substantially greater habitat areas occur within the region considered in the Draft EIR, including those preserved in open space uses such as the conserved lands in Tejon Ranch and the conserved lands for the Angeles National Forest, than is identified in the AV RCIS Area. The Project has also been designed to avoid the highest biological value portions of the site, and approximately 1/3 of the areas on the west and northwest portions of the area mapped in the June Admin Draft as the "Western Antelope Valley" have been avoided and preserved within the Centennial On- and Off-site Mitigation Preserve.

Similarly, the area identified as a habitat core and referred to as "Pine Canyon" contains a portion of the Project site which was studied and analyzed in detail as well. This area contains habitat applicable to all three species groups modeled by the AV RCIS including desert, agriculture/grassland, and foothill/riparian. In addition, this area was also evaluated for off-site mitigation value and is included nearly in its entirety within the Centennial On- and Off-site Mitigation Preserve. The Centennial Mitigation Preserve captures a total of 45,000+ acres within the area (inclusive of Kern County) which represents a large percentage of the general regional core habitats west of Palmdale and Lancaster, including core habitats identified by the June Admin Draft preparers and project opponents.

Finally, the Draft EIR extensively considered the issue of the Project site's importance to wildlife movement and connectivity, as discussed in Draft EIR Section 5.7, Biological Resources (Impact 7-2). The Draft EIR concludes that as mitigated, the Project will have a less than significant impact on wildlife movement. Specifically, the Draft EIR concludes based on extensive project-level analyses conducted over two decades, that:

[1882] *Id.,* App. G

> Information presented in the Wildlife Movement discussion clearly identifies the foothills and highlands of the Tehachapi Mountains as the regional linkage zone, and the core area of this linkage zone is several miles to the northwest of the Project Site. As a result, the Project's indirect impacts [to wildlife movement] are not expected to reach the primary regional linkage area, and regionally connectivity is expected to be minimally impacted. The Project would not cause any regional populations of plants or animals in adjacent regions to become isolated. The Project's indirect impacts on wildlife movement are therefore considered to be less than significant.
>
> (DRP 2017, p. 5.7-170)

The June Admin Draft, although it does not include the technical methodology used to create its resource ranking maps, shows the east-west center of the Project site as a "least cost corridor" for wildlife movement, where as noted by the Commenter "the animals have the easiest time moving through the area." (Figure 3-9) However, this location is bisected by the California aqueduct, and onsite evidence shows that there is minimal to no linkage across the aqueduct in the center of the site. This wildlife connectivity example is one of numerous examples of the kind of simple but fundamental errors that occur when predicting biological information as opposed to having access to or developing the range of site-specific studies completed for the Draft EIR. Even such foundational information as the location of the Project itself is in error in the June Admin Draft, which for example omits southern and eastern site areas from Figure 2-13. Similarly, Figures 2-3 and 2-5 incorrectly maps areas of the Project site as grasslands which are known to be woodlands, and Figure 3-13 depicts as riparian locations on the site that are not riparian.

Appendix F, "Focal Species Habitat Models," consist solely of a series of 27 figures, 26 of which depict predicted species occurrence data and confirmed species occurrence data. The methodology used to create the Figures is not explained. Half of the figures show some predicted or confirmed occurrence information on the Centennial project site. The Draft EIR considered each of the 14 species for which predicted or actual occurrence data is depicted in Appendix F. The June Admin Draft both understates and overstates species data, apparently excluding the site-specific data included in the Draft EIR that had been published earlier in the summer. Specific responses are provided below for all species for which Appendix F shows predicted occurrences on the Project site:

Appendix F Species Figures	June Admin Draft and Actual Ground-Truthed Conditions Accurately Reported in Centennial Draft EIR
F-11: California Condor	June Admin Draft predicts extensive foraging and some roosting activity on the Project site; however, condor GPS tracking data and other data reported in the Draft EIR confirm that there is very little foraging, and no roosting (DRP 2017, pp. 5.7-94, 5.7-118 through 5.7-120, and 5.7-148).
F-12: Golden Eagle	June Admin Draft shows isolated area near SR-138 as part of the "species range;" however, this species is known to occur throughout much of the region both on- and off- the Project site (DRP 2017, pp. 5.7-90, 5.7-114, and 5.7-150).
F-14: Least Bell's Vireo	June Admin Draft predicts "high occurrence" areas on Project site; however, numerous onsite surveys show extremely little usage and no evidence validates high occurrence prediction. In addition, the Project site is not within USFWS designated Critical Habitat for this species (DRP 2017, pp. 5.7-97, 5.7-122, and 5.7-148).
F-15: Loggerhead Shrike	June Admin Draft shows predicted "high occurrence" areas on the Project site and throughout much of the project region; however, the eBird and CNDDB data provided suggest a much more sparse occurrence and no evidence validates high occurrence. As discussed in the Draft EIR, shrike were detected in various areas of the Project site, but that nesting habitat is expected to be restricted to Oso Canyon and the woodland habitats at western edge of site. (DRP 2017, pp. 5.7-95, 5.7-121, and 5.7-151)
F-16: Long-Billed Curlew	June Admin Draft shows predicted "high occurrence" areas on the Project site; however, the eBird and CNDDB data provided suggest a very limited occurrence in the region. Surveys conducted for the Centennial project detected only a few migrants on-site over multiple years. Potentially suitable breeding habitat is present on the Project site, but no nesting activities have been observed (DRP 2017, pp. 5.7-95, 5.7-121, and 5.7-151).
F-18: Northern Harrier	June Admin Draft shows predicted "high occurrence" areas on the Project site and adjacent areas; however, observation data included in Appendix F does not exhibit higher use in this area relative to the balance of the RCIS area. The Draft EIR indicates that this raptor was observed using the Project site for foraging but not breeding, although potentially suitable nesting habitat is present where sufficient amounts of vegetative cover are available to protect this ground-nesting raptor (DRP 2017, pp. 5.7-93, 5.7-117, and 5.7-150).
F-19: Prairie Falcon	June Admin Draft shows predicted "high occurrence" areas on a portion of the Project site and throughout most of the valley floor portions of the RCIS area; however, the observation data provided does not support a conclusion of higher use in Project area relative to other areas of the RCIS where the species has been detected more regularly. As described in the Draft EIR, the prairie falcon was observed using the Project site for foraging but it is not expected to breed on-site. (DRP 2017, p. 5.7-103). Also note, this falcon is not considered special status for the purposes of State CEQA guidelines but was discussed in the Draft EIR as a species considered to be at risk of decline or extirpation in Los Angeles County by the Los Angeles Chapter of the Audubon Society (DRP 2017, p. 5.7-89).
F-20: Swainson's Hawk	June Admin Draft depicts "Expert Model Distribution" range of this species which appears to depict foraging during both breeding and migrating periods without any distinction between these very different periods. No explanation of the meaning of this category is provided and the lack of distinction between migrating and breeding areas is inconsistent with other species shown such as the willow flycatcher. Surveys for the Draft EIR found migrants passing by in spring, and foraging over the east end of the Project site in vicinity of the alfalfa fields, but no breeding birds were detected. The riparian habitats on the Project site are considered too sparse to provide suitable nesting habitat for this raptor (DRP 2017, pp. 5.7-93, 5.7-115, 5.7-116, 5.7-145, 5.7-148 and 5.7-149).

Appendix F Species Figures	June Admin Draft and Actual Ground-Truthed Conditions Accurately Reported in Centennial Draft EIR
F-21: Tricolored Blackbird	June Admin Draft shows predicted "high occurrence" areas on a portion of the Project site and throughout much of the RCIS area; however, the observation data provided does not support a conclusion of higher use in the Project area relative to other areas of the RCIS where the species has been detected more regularly. As described in the Draft EIR, a nesting colony was detected on-site in 2006 and 2008 using vegetation associated with a pond on the north-central edge of the Project site, but not thereafter. In 2015, large numbers were found nesting outside the Project site in vegetation surrounding Quail Lake. The Project site provides suitable foraging habitat, but very little potentially suitable nesting habitat (DRP 2017, pp. 5.7-91, 5.7-111, 5.7-112, 5.7-113, 5.7-114, 5.7-149 and 5.7-150).
F-22: Willow Flycatcher	June Admin Draft predicts several scattered "high occurrence" locations on the Project site; however, onsite surveys have confirmed that breeding is not occurring on predicted areas of the site. Migrant willow flycatchers may occur in almost any habitat and at any location in the region during spring and fall migrations, however, numerous onsite surveys show extremely little usage and no evidence validates high occurrence prediction. In addition, the Project site is not within USFWS designated Critical Habitat for this species (DRP 2017, pp. 5.7-94, 5.7-118, and 5.7-148).
F-23: American Badger	June Admin Draft predicts "high occurrence" locations on portions of the Project site and vast portions of the valley floor within the RCIS area. Although dens have been observed on-site, they have occurred in areas outside of the mapped "high occurrence" area where, in fact, no detections have occurred. Additional, the areas designated as high occurrence provide no evidence of increased suitability relative to most other areas on the site (DRP 2017, pp. 5.7-98, 5.7-126, and 5.7-153).
F-24: Desert Kit Fox	June Admin Draft predicts "high occurrence" over most of the Project site as well as adjacent areas; however, this species is not known to exist in these areas and have never been located during two decades of on-site survey work.
F-25: Mojave Ground Squirrel	June Admin Draft correctly indicates no occurrence for this species on the Project site. The Project site is west of the known range of the Mojave ground squirrel.
F-26: Mountain Lion	June Admin Draft shows isolated area near SR-138 as part of the "species range;" however, this species is known to occur throughout much of the region both on- and off- the Project site.
F-27: Tehachapi Pocket Mouse	June Admin Draft predicts "high occurrence" at Project site; however, the entirety of the Project site was assessed by a qualified biologist and determined to be unsuitable habitat for this species.

The factual errors in the June Admin Draft are typical of what would be expected to occur in a large-scale planning exercise, given the cost and time required to complete site-specific surveys. However, it is also the case that much of this work is predictive and has not been validated by actual site surveys. Since Appendix F, along with the missing Appendix G, served as source data for most of the biological value ranking information in the June Admin Draft, and the species mapping source data is substantially in error as applied to the Project site, the June Admin Draft does not create substantial evidence of a new or worse significant adverse biological resource impact, and accordingly recirculation of a revised Draft EIR is unwarranted.

Commenters' Views Conflict with Independent Biological Resource Expert Findings by Five State Agencies and Sierra Club, NRDC, Endangered Habitats League and Audubon California. Finally, while the June Admin Draft is more recent, the Commenters' assertion that it presents significant new information warranting recirculation must be weighed against the many independent agencies and environmental advocacy groups that have already extensively evaluated the biological resource values of Tejon Ranch in the context of the proposed development of the Centennial site. The Tejon Ranch Land Use and Conservation Agreement (Ranch-Wide Agreement or TRCRWA) is a historic example of the "voluntary conservation mechanisms" that the Legislature intended the RCIS program to encourage. Specifically, and as agreed to in Exhibit R of the TRCRWA the Secretary for the California Resources Agency, the Director of the California Department of Fish and Game, the Director of the Wildlife Conservation Board, the Director of the California State Parks Department, the Secretary for the California Environmental Protection Agency, and the Chair of the California State Water Resources Control Board:

> [W]e understand that of the approximately 270,000 acres comprising [Tejon] Ranch, the Ranch-wide Agreement would provide for the permanent preservation of at least 178,000 acres and for the option to preserve an additional 62,000 acres through the purchase of conservation easements, or potentially fee title, for an anticipated total of approximately 240,000 acres, or almost 90 percent of the total Ranch acreage. Because of the many unique factors noted above, **including the sheer magnitude of this conservation effort and the significant resource values attributed to this property**, and in viewing the 240,000 acres in the Conserved Areas in a holistic manner, **we expect that TRC [Tejon Ranchcorp, the owner of Tejon Ranch] will be allowed to use those Conserved Areas and corresponding natural resource values associated with these Conserved Areas to meet the land conservation and corresponding natural resource mitigation requirements for and the planned development** and other activities within the Developed Areas, **including** the designated planned development projects of Tejon Mountain Village, **Centennial** and Grapevine, subject to potential limitations for Conserved Areas acquired using public funds as described below.[1883]

According to the environmental advocacy group signatories to the TRCRWA, including Audubon California, the Endangered Habitats League, the Natural Resources Defense Council, the Planning and Conservation League, and the Sierra Club (collectively referred to as the "Resource Group" in the TRCRWA):

[1883] Conservation easements were acquired with public funding on the 62,000 acres referenced in Appendix R, as described in the Draft EIR. The Draft EIR notes that pursuant the Ranch-Wide Agreement, conservation easements were purchased in March of 2011, and that three of the five conservation easement purchase areas comprising approximately 20,000 acres are proximate to the Centennial site (DRP 2017, p. 4-45). The Draft EIR also notes that management of these areas is "subject to the conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch" (DRP 2017, p. 5.7-62).

> This Agreement was reached **after two years of careful scientific analysis** and intense negotiations between TRC, its partners and the Resource Groups. All parties believe that the Agreement provides for a far better conservation outcome than the typical project-specific permitting and protracted litigation methods most often used in development and conservation disputes. (TRCRWA, Executive Summary, 2008, emphasis added)
>
> The Parties to this Agreement desire to protect in perpetuity substantial and significant natural resource values of the 270,000-acre Tejon Ranch. These natural resource values include an extraordinary diversity of native species and vegetation communities, numerous special status plant and animal species, intact watersheds and landscaping supporting natural ecosystem functions and regionally significant habitat connectivity.
>
> The long-term conservation of Tejon Ranch has been one of the highest priorities of the Resource Organizations. . . . By comprehensively addressing the entire Tejon Ranch, this Agreement avoids fragmentation of many of the environmentally sensitive areas on Tejon Ranch.
>
> This Agreement allows TRC to pursue development plans in defined development areas without opposition from the Resource Organizations while enabling a conservancy to preserve Tejon Ranch's natural resource values for future generations."
>
> (TRCRWA, p. 1-2, emphasis added)

Given that 90 percent of Tejon Ranch was permanently conserved, and only 10 percent can be developed (inclusive of the Centennial site), the inclusion of Tejon Ranch in the initial administrative draft of the AV Plan (submitted under separate cover by the same commenter, see Comment F.9-1 below) did not further the RCIS program purpose of proactively identifying future conservation and mitigation lands for future compensatory mitigation use. Tejon Ranch, inclusive of the Centennial site, was also the subject of two years of intense scientific review by the Resource Organizations as part of the TRCRWA process, and has been the subject of more than 20 years of biological resource studies as part of the Centennial Draft EIR preparation process.

Response to Comment F.8-172A:

The Commenter provides this citation to support its statement that there is a new type of non-regulatory conservation program in California called the Regional Conservation Investment Strategy Program. The cited web address leads to a summary webpage prepared by the California Department of Fish and Wildlife that summarizes the program. This reference is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors. Please see response to Comment F.8-172 for a substantive response regarding the Regional Conservation Investment Strategy Program.

Response to Comment F.8-172B:

The referenced one-page document is titled *Antelope Valley Regional Conservation Investment Strategy (AV RCIS),* with a footer that reads "Antelope Valley RCIS, Public Meeting, March 7, 2017." The document consists of (i) a Stakeholders for the AV RCIS," which list includes the name of commenter CBD. The Commenter's submittal of this document, and the document itself, are noted, included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The assertion for which the Commenter provides this citation is substantively addressed in response to Comment F.8-172.

Response to Comment F.8-173:

As a general matter, mitigation plans are not required to be circulated with the EIR so long as the mitigation measure identifies the criteria the lead agency will apply in determining that the impact will be mitigated. This type of mitigation approach is consistent with CEQA, which permits the formulation of detailed plans at a future date as long as the mitigation measure includes specified performance standards and identifies a range of feasible measures that may be implemented to achieve the performance standard and meet mitigation commitments.[1884]

The following table summarizes the applicable performance standard, and feasible measures for meeting this standard, for each of the referenced mitigation plans. The more detailed text in some of these mitigation measures also remains applicable to the Project. Note that there is no separate "plan" proposed for the biological resources mitigation program as a whole, which consists of all biological resource mitigation measures. Implementation of these biological resource mitigation measures, as well as other mitigation measures, is included in the County's Mitigation Monitoring and Reporting Program (MMRP).

Mitigation Plan	Performance Standard	Feasible Actions for Achieving Performance Objectives
Special Status Plant Species Restoration Plan (MM 7-1)	1) Preservation on Mitigation Preserve (excluding WCB Easement Areas) at a 2:1 ratio for impacted individual rare plants 2) If preservation alone does not meet the ratio, creation or enhancement (to increase individual plant occurrences) on Mitigation Preserve (including WCB Easements) sufficient to meet the 2:1 mitigation ratio.	Prior to grading for each phase: a. Identify rare plant areas on Mitigation Preserve sufficient to achieve 2:1 and document location of preserved populations. b. If 2:1 ratio is not preserved, then submit a plan to enhance and/or establish populations on Mitigation Preserve to be approved by the County and CDFW. The plan, shall contain the following methods to ensure that the performance criteria are met: (1) identification of and suitability analysis for the enhancement area; (2) procedures for the collection and temporary storage of seed (all

[1884] CEQA Guidelines § 15126.4(a)(1)(B)

Mitigation Plan	Performance Standard	Feasible Actions for Achieving Performance Objectives
		available seed from every impacted occurrence shall be collected); (3) planting procedures, including soil preparation and irrigation; (4) a schedule and action plan to maintain and monitor enhanced, restored, and/or created populations; (5) methods to control plant densities of competing plants; (6) for preservation area(s), identification of plant occurrence locations for future management under the Ranch-wide Management Plan; (7) for creation or enhancement area(s), monitoring to confirm successful implementation of the 2:1 mitigation ratio; (8) contingency measures to further create or enhance plantings in creation or enhancement areas where monitoring results do not show successful 2:1 mitigation, which shall remain in effect until such time as the 2:1 mitigation ratio has been achieved.
Wildlife Relocation Plan (MM 7-2)	Relocate silvery legless lizard, coast horned lizard, and two garter snakes in advance of construction to minimize species mortality.	The Plan shall provide the methods for the safe relocation of silvery legless lizard, cost horned lizard and two-striped garter snake detected during pre-construction surveys and shall include: (1) identification of potentially suitable areas for receiving relocated animals outside the planned construction area; (2) trapping and relocation methods that shall be used in the relocation process, including adherence to the Amphibian Task Force Fieldwork Code of Practice; and (3) identification of number of individuals of each species that shall be allowed to be placed in each planned relocation area. The Plan shall be prepared by a qualified biologist; (2) provided to CDFW for review and comment; (3) approved by the County prior to issuance of the first grading permit; and (4) implemented prior to grading an area for which the pre-construction survey identified one or more of these species.

Mitigation Plan	Performance Standard	Feasible Actions for Achieving Performance Objectives
Native Perennial Grassland and Wildflower Field Mitigation* (MM 7-10)	Grasslands, inclusive of native perennial grasslands and wildflower fields, shall be preserved at a 2:1 ratio (i.e., minimum of 12,832 acres preserved), and managed in accordance with the RWMP.	A total of 14,908 acres of grassland preservation in the Mitigation Preserve has been identified in Figure 5.7-10. Management of the Mitigation Preserve shall be in accordance with the RWMP, which incorporates BMPs for grazing, including Residual Dry Matter targets, and weed management, including invasive plant mapping and targeted removal actions (see RWMP Vol. II Sections 5.1 and 5.2). The RWMP includes standards for management of the grasslands areas that will preserve the grasslands in perpetuity. The RWMP shall include a Figure depicting the Mitigation Preserve lands used to meet this 2:1 preserve ratio.
Oak Woodland Habitat Mitigation Plan (MM 7-11)	Meet a 2:1 ratio by: (1) Preserving 6.2 acres of mixed oak woodland on the Mitigation Preserve; and (2) Creating 6.2 acres of mixed oak woodland on the Mitigation Preserve meeting a density of 80 oak trees per acre (or such other density as directed by the County Forester, including the establishment of 322 oak trees to replace impacted individual oak trees at a ratio of 3:1 for non-heritage oaks and 10:1 for heritage oaks.	The Plan shall provide for the creation of oak woodlands, shall comply with the standards and requirements of Section 21083.4 of the *California Public Resources Code* (SB 1334) and the County of Los Angeles Oak Tree Ordinance, and shall include the following actions at a minimum: 1. process for native acorn collection within the project watershed for planting (a) in ground and (b) in containers 2. site selection for planting in consultation with County Forester 3. propagation of container trees on site 4. strategy to provide overstory, midstory and understory, including acorn plantings, container tree plantings and yearly sowing 5. include a planting management program for review by the County Forester (e.g., three planting seasons. The first planting season, year 0, being the acorn and sun tolerant ground covers; the second planting season occurring at approximately year 5, introducing sun/shade tolerant species: and the third planting season at year 10 with the introduction of more shade tolerate understory species, including the use of reference sites.) 6. temporary irrigation, weeding and management procedures 7. annual monitoring for a 15-year period, which includes (i) qualitative monitoring (i.e., photographs and general observations); (ii) yearly quantitative monitoring (i.e., randomly

Mitigation Plan	Performance Standard	Feasible Actions for Achieving Performance Objectives
		placed transects to assess vegetation type coverage and systematically assess all mitigation oak trees); and (iii) annual reports. The Plan shall be (1) prepared by a qualified Restoration Specialist and (2) approved by the County prior to any clearing or grading for any tract map that affects any oak woodland vegetation.
Streambed and Wetland Habitat Creation and Enhancement Plan (MM 7-12)	Mitigate for the loss of waters/riparian areas by (1) providing approximately 4,748.5 functional equivalent units under the Functional Capacity Unit (FCU) methodology (or other accepted functional value unit); or (2) meeting the following mitigation ratios: a. Wetland Waters: 2:1, including 1:1 restoration and 1:1 enhancement, of wetland waters. b. Streams: i. 1:1 preservation of ephemeral and/or intermittent streams for permanent impacts to ephemeral non-wetland waters of the state (non-riparian) ii. 1:1 preservation of intermittent streams for permanent impacts to intermittent non-wetland waters of the state (non-riparian) iii. 1:1 restoration of intermittent streams for temporary impacts to intermittent non-wetland waters of the state (non-riparian) c. Riparian Vegetation: 2:1, including 1:1 restoration and 1:1 enhancement of riparian vegetation.	Under either performance standard methodology, enhancement and creation will be performed pursuant to a Plan which shall comply with all requirements specified in the regulatory agency permits and/or agreements, shall follow all construction mitigation measures of the EIR, and shall include the following for each tentative tract map area: a) statement of impacts and avoidance, including temporary and permanent impacts b) statement of mitigation performance standard being met (functional value or acreage ratio) c) standards for minimizing and restoring temporary impacts, which include recontouring and erosion control for intermittent channels and reseeding requirements for riparian vegetation areas. d) identification of preservation, enhancement and/or creation sites on Mitigation Preserve e) for permanent impacts: (i) a summary of location of preserved wetlands and/or waters required to achieve applicable preservation performance standards; (ii) procedures to restore and/or enhance wetlands and/or waters and replace riparian vegetation in-kind as required to achieve applicable enhancement/ restoration performance standards, which shall include: (A) Site Preparation, including fencing, grading and contouring to improve topographic heterogeneity and floodplain benching, erosion control; (B) Planting Implementation, including, plant species, sizes, mulching, seed mix; (C) Maintenance Practices, including supplemental watering, weed control, trash removal, pest management, cattle exclusion

Mitigation Plan	Performance Standard	Feasible Actions for Achieving Performance Objectives
		methods; (D) Monitoring Requirements, including a minimum 5-year period of (I) qualitative; (II) quantitative and (III) annual reporting to confirm compliance with vegetation success criteria at the end of a five year period: for species richness (≥10), native vegetative cover (≥70%) and invasive species (≤5%); and (E) Contingency Measures to ensure compliance with applicable mitigation performance standards. The Plan shall be (1) prepared by a qualified Restoration Specialist; and (2) approved by the County and CDFW, and RWQCB prior to grading that would impact jurisdictional waters or wetlands.
Landscaping Plan (MM 7-13)	Prevent the introduction of non-native, invasive species in the landscaping used in project development areas.	The Plan shall provide for a list of allowed and prohibited plant types and shall include at a minimum: 1) A plant palette of low irrigation, non-invasive species that are adapted to the conditions found on the Project site. 2) a prohibition on the use of and retail of invasive plants 3) a requirement that the list of allowed and prohibited plants be provided to the Homeowners Association for distribution to future residents on site. The Plan shall be (1) prepared by a qualitied biologist; (2) submitted to the County for approval with each tentative map; (3) provided to builders; and (4) provided to future project occupants as described in the Specific Plan.

Mitigation Plan	Performance Standard	Feasible Actions for Achieving Performance Objectives
Fire Protection Implementation Plan (MM 7-21)	Meet State and County fire prevention requirements for the development area, and prohibit vegetation clearance for fire risk abatement within Significant Ecological Area (SEA) 17 or mitigation preserve areas.	The Plan shall include: (a) a summary of applicable State and County fire risk abatement requirements; (b) a prohibition on the use of vegetation clearance within SEA 17 or mitigation preserve areas. A Plan shall be submitted to the County for approval with the first tentative map., and shall be updated to include new or modified State or County fire risk abatement requirements as part of each subsequent tentative tract map submittal.
Golf Course Management Plan (MM 7-22)	Construct and manage golf courses, if proposed, utilizing best practices to minimize environmental impacts.	The Plan shall incorporate the design and management measures consistent with the Audubon Cooperative Sanctuary Program for Golf Courses (or equivalent); an overview of this Program is provided as Final EIR Appendix 5.7-F. The Plan shall be submitted to the County for approval with any tentative map that includes a golf course.
* Based on response to comments edits, no new plan is required.		

Response to Comment F.8-174:

The Commenter's opinions about mitigation compliance are noted. The Commenter provides no examples or citations to studies showing mitigation non-compliance. Please see response to Comment F.8-173 confirming that CEQA does not require details mitigation plans to be included in an EIR, provided that the EIR includes performance objectives and feasible measures for achieving those objectives. These objectives and measures are provided in the table above.

Response to Comment F.8-175:

The Commenter's opinion regarding the effect of climate change on the biological landscape of the Project site is noted. According to the U.S. Environmental Protection Agency (USEPA), "[a]verage temperatures have risen across the contiguous 48 states since 1901, with an increased rate of warming over the past 30 years. Eight of the top 10 warmest years on record have occurred since 1998…Within the United States, temperatures in parts of the north, the west, and Alaska have increased the most." The USEPA goes on to conclude that other climate change impacts include more extreme temperatures during the summer and winter, more severe storms, and greater annual precipitation.[1885] Notwithstanding global climate change impacts, like increased rainfall, the Project site is also influenced by California's historic variation in rainfall levels and multi-year drought conditions.

[1885] U.S. Environmental Protection Agency (USEPA). 2016 (August 2, last updated). Climate Change Indicators: Weather and Climate. Washington, DC: USEPA. https://www.epa.gov/climate-indicators/weather-climate.

Accordingly, climate change is an existing condition that has influenced the current biological setting of the Project site, and this existing physical setting is the "baseline" from which Project impacts are assessed in Section 5.7, Biological Resources, in the Draft EIR. The California Supreme Court has affirmed several earlier appellate court decisions that held that the California Environmental Quality Act does not require an assessment of the environment's impact on a project. See *Ballona Wetlands Land Trust v. City of Los Angeles (2011) 201 Cal.App.4th 455*, in which the Court held:

> We believe that identifying the environmental effects of attracting development and people to an area is consistent with CEQA's legislative purpose and statutory requirements, but identifying the effects on the project and its users of locating the project in a particular setting is neither consistent with CEQA's legislative purpose nor required by the CEQA statutes.[1886]

The California Supreme Court declined to review or overturn the *Ballona* decision, which concluded that the climate change impact of sea level rise did not need to be addressed in a coastline development project under CEQA. Indeed, in a later decision, the California Supreme Court confirmed that CEQA does not require an assessment of the environment's impact on a project.[1887]

As in *Ballona*, where the court held that CEQA does not require an EIR to include an impact assessment or mitigation measures addressing the predicted increase in sea level caused by global climate change, here CEQA does not require the EIR to include climate change adaptation strategies to address the effects of global climate change on the Project site's biological resources.

However, it should be noted that the Project does incorporate features that would assist with climate change adaptation, including preservation of significant contiguous open space preserve areas that are positioned intermediately between the desert floor and higher slopes to help accommodate potential future climate zone changes within these areas; these permanently preserved open space areas include both Project mitigation lands as well as the hundreds of thousands of acres preserved under the TRCRWA. The Project also includes design features such as wildlife corridors for smaller species throughout the Project site. The Project is also required to comply with all GHG reduction measures under applicable laws (including newly-adopted laws and regulations), and to further reduce GHG as required by MMs 21-1 through 21-20 on pages 5.21-88 through 5.21-94 of the Draft EIR.

Response to Comment F.8-176:

The Commenter's opinions that global climate change will result in habitat destruction and fragmentation, loss of connectivity for terrestrial wildlife, and that introduction of predator and invasive species associated with the proposed Project, are noted. Within the context of the analysis required by CEQA, the Draft EIR addressed the setting, impacts, and mitigation

[1886] *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal. App. 4th 455 ("*Ballona*")
[1887] *CBIA v. BAAQMD*

measures for habitat impacts including fragmentation and habitat loss,[1888] wildlife connectivity,[1889] predators such as feral cats being more likely to occur in developed areas,[1890] and invasive species avoidance and control.[1891] The Commenter's opinions that the location of the Project site could undermine future climate change adaptation and mitigation strategies, and harm the ecosystem in the context of climate change, are noted. As discussed in response to Comment F.8-20, the Project is sited in a location projected for future development by, and is consistent with, the regional Sustainable Communities Strategy adopted pursuant to Senate Bill 375, the state's premiere strategy for addressing greenhouse gas emissions related to the land use sector.

Response to Comment F.8-177:

Conserved lands are required to be managed in accordance with all applicable mitigation requirements, and all applicable legal requirements. Mitigation requirements for the open space lands to be preserved as part of the Project approval process are included in the Draft EIR (MMs 7-4, 7-10, 7-11, and 7-17).[1892] The Commenter's concern about the effect of global climate change on conservation lands and conservation activities is noted, but, as described above in response to Comment F.8-175, is outside the scope of CEQA.

Response to Comment F.8-177A:

The comment is noted for the record. The comment does not address or question the content of the Draft EIR, but instead provides the website location for the Ranch-wide Management Plan (RWMP) data cited by the Commenter in Comment F.8-177. It should be noted that in an effort to make the plan for implementing MM-7-10 available,[1893] the RWMP shall be adopted and no new plan (referred to as the Native Perennial Grassland and Wildflower Field Mitigation Plan in the Draft EIR) will be prepared. Management of the Mitigation Preserve shall be in accordance with the RWMP, which incorporates BMPs for grazing, including Residual Dry Matter targets, and weed management, including invasive plant mapping and targeted removal actions. The RWMP includes standards for management of the grasslands areas that will preserve the grasslands in perpetuity. The RWMP shall be included in the Final EIR as a new appendix and the following edit is hereby made to page 5.7-62 of the Draft EIR.

> Under the TRCRWA, the Tejon Ranch Conservancy will adopt, update, monitor and enforce implementation of the Ranch-~~W~~wide Management Plan (RWMP) (Final EIR Appendix 5.7-D) on dedicated conservation areas and option areas subject to conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch.

1888 DRP 2017, pp. 5.7-142 to -164
1889 *Id.,* pp. 5.7-164 to -170
1890 *Id.,* p. 5.7-169
1891 *Id.,* p. 5.7-167
1892 *Id.,* pp. 5.7-177, -180, -181, -192
1893 *Id.,* p. 5.7-180

Response to Comment F.8-178:

Please refer to response to Comment F.8-175. The Commenter's opinion regarding the effect of climate change on the biological resources of the Project site is noted. As discussed in response to Comment F.8-175, climate change is an existing condition that has influenced the current biological setting of the Project site, and this existing physical setting is the "baseline" from which Project impacts are assessed in Section 5.7, Biological Resources, in the Draft EIR. The comment that the Draft EIR needs to include an analysis of the Project's impacts to biological resources due to climate change, like the *Ballona* decision that CEQA does not require an impact assessment or mitigation measures for the predicted increase in sea level caused by global climate change, falls outside the scope of the analysis required under CEQA.

In addition, in an effort to provide a general understanding of the potential impacts of climate changes on biological resources, a new section is added to the Draft EIR. The following text is hereby inserted at the end of Section 5.7.6, Environmental Impacts, on page 5.7-173.

> *Impact of Climate Change on Biological Resources*
>
> Climate change is projected to be a powerful stressor, posing a risk of abrupt and irreversible regional-scale change in the composition, structure, and function of terrestrial, freshwater, and marine ecosystems (IPCC 2014). It may affect air temperature, precipitation, snowpack, streamflow, water availability, fire, and vegetation. In addition, marine environments may experience rising ocean temperature, sea level rise, ocean acidification, and upwelling. While climate models attempt to predict future changes, some of these results are already observable. The table below provides a list of observed impacts in North American attributed to climate change since the IPCC's fourth Assessment Report, published in 2007.

Observed Impacts in North America Attributed to Climate Change

Observed Impact	Confidence	Contribution from Climate Change
Shrinkage of glaciers	high	major
Decreasing amount of water in spring snowpack	high	major
Shift to earlier peak flow in snow-dominated rivers	high	major
Increased runoff	medium	minor
Phenology changes and species distribution shifts upward in elevation and northward	medium	major
Increased wildlife frequency in subarctic conifer forests and tundra	medium	major
Regional increases in tree mortality and insect infestations in forests	low	minor
Increase in wildfire activity, fire frequency and duration, and burnt area in forests	medium	minor
Changes in mussel beds along the west coast	high	major
Changed migration and survival of salmon in the northeast Pacific	high	major
Confidence in the validity of a finding is based on the type, amount, quality, and consistency of evidence (e.g., data, mechanistic understanding, theory, models, expert judgment) and the degree of agreement. Source: IPCC 2014		

These effects on the environment due to climate change may have a variety of direct and indirect effects on plant and wildlife species. Climate change, especially in conjunction with other stressors such as habitat modification, pollution, and invasive species, presents an increased risk of extinction for both terrestrial and aquatic species. This risk is expected to increase with both the magnitude and rate of climate change (IPCC 2014).

Statewide modelling predicts that alpine/subalpine forest, evergreen conifer forest cover, mixed evergreen woodland, and shrubland will decline while mixed evergreen forest and grassland are predicted to increase (Lenihan 2008). In southwestern California, the area of chaparral/coastal sage scrub is projected to decrease by 38 to 44 percent and the area of grassland is projected to increase by 345 to 390 percent by 2070 (PRBO 2011). Sea level rise may affect coastal and estuarine habitats, potentially leading to the inundation and loss of tidal marshes (PRBO 2011).

Changes in vegetation communities can be exacerbated by changes in fire severity and frequency. The effect of climate change on fire in California is complex, with different climate models predicting either a decrease or increase in the probability of large fires in southern California. Drier conditions in one model projected a reduced fire risk while a wetter climate model predicted in increase in the probability of large fires (PRBO 2011). Fire may slow or limit the encroachment of woody vegetation into grasslands

> under less dry conditions, but hasten the transition from woody vegetation to grassland under drier conditions (Lenihan 2008). Fires may impact species through direct mortality and indirectly by modifying vegetation structure and composition.
>
> In response to climate change's effects on the environment, terrestrial plant and wildlife species shift their geographic ranges and seasonal activities. This can lead to changing interactions among species, including competition and predator-prey dynamics. Species are expected to generally relocate upward in elevation and to higher latitudes; however, the response varies across species, with some are projected to move to lower elevations (Langham et al. 2015). National Audubon Society (2015) modeling predicts that 314 of the 588 North American bird species studied will lose more than 50 percent of their current geographic range by 2080. Warming has also been found to cause shifts in the abundance, geographic distribution, migration patterns, and timing of seasonal activities of marine species. This has been observed over recent decades and is projected to continue.

The Project will accommodate residential and employment uses and related community uses such as schools and parks that will be located either within the Project site or in an alternative in or outside of California. In the states most likely to receive California migrants—Texas, Nevada, Arizona—the United States Energy Information Administration reports have per capita GHG emissions that are more than twice as high as California's per capita emissions.[1894] As discussed in Section 5.21, California has enacted the nation's most stringent GHG reduction mandates including SB 32. Accommodating population and employment growth in California, including at the Project site, will result in lower global GHG emissions than failing to accommodate such growth in California in a land use pattern that is consistent with and helps implement the SCAG regional GHG reduction plan as approved by the CARB under SB375. Please refer to Section 5.21 of the Draft EIR, and responses to Comments F.8-79 through F.8-86 for additional analysis of the Project's climate change impacts.

Response to Comment F.8-179:

Please see responses to Comments F.8-173 and F.8-174.

Response to Comment F.8-180:

The Commenter's suggestion that existing, disturbed areas be considered as an alternative to the Project site has already been addressed in the Draft EIR. As explained in more detail in response to Comment F.8-65, the Draft EIR presents a reasonable range of potentially feasible on- and off-site alternatives to the Project that would reduce and/or avoid some of the Project's potentially significant environmental impacts while achieving most of its objectives. The selected alternatives promote informed decision making and public

[1894] U.S. Energy Information Administration (USEIA). 2017 (January 17). *Energy-Related Carbon Dioxide Emissions at the State Level, 2000-2014.* Washington, DC: USEIA. https://www.eia.gov/environment/emissions/state/analysis/.

participation by providing for consideration of a range of alternative land use patterns and siting options that will reduce and/or avoid some of the Project's significant environmental effects and attain most of the Project objectives. Accordingly, the alternatives analysis complies with the requirements of *Public Resources Code* §§ 21002, 21002.1(a). This comment suggests that the Draft EIR analyze an alternative that would place the Project on "disturbed lands that could be restored." However, the environmental setting of the AVAP planning area does not provide opportunities for high-density mixed-use development on previously disturbed areas located outside of designated EOAs in a manner that would also be consistent with AVAP's planning vision and Rural Preservation Strategy.

As explained in the Project Draft EIR and in the AVAP EIR, the AVAP planning area covers 1,800 square miles of predominately rural land that is either undeveloped or occupied by government uses, such as National Forests.[1895,1896] A smaller portion of the AVAP planning is occupied by single-family uses, military facilities, farmland and regional parks, and the remaining 1 percent of the total land area is occupied by multi-family residential, commercial, office, industrial, golf courses, schools and miscellaneous uses.[1897] The only truly urban areas within the boundaries of the AVAP planning area are the incorporated cities of Lancaster and Palmdale, which are outside of the County's land use jurisdiction.[1898] There are a few scattered communities in the AVAP planning area within the County's land use jurisdiction, but these are small rural communities that cannot accommodate projected future growth without significantly comprising their existing rural character.[1899] Given the rural qualities of the AVAP planning area, there are no "disturbed lands that could be restored" that could feasibly accommodate future growth projected for the Project site's TAZs in high-density mixed use commercial/residential development projects. Certainly not without seriously compromising the rural character of the AVAP planning area outside of designated EOAs and completely undermining the AVAP project objectives described above.

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to designated EOA, which were specifically selected to due to their proximity to large existing and planned transportation infrastructure projects (i.e., the High Desert Corridor and NW-138 Corridor Improvement Project).[1900] Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (*see* AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude designated EOAs, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (*See* AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within EOAs so as to preserve the rural character of Antelope Valley outside of the EOAs. Thus, contrary to the Commenter's claims in this and other related comments, the Draft EIR's decision to reject

1895 DRP 2017, pp. 4-8 to -10
1896 DRP 2014a, p. 5.10-4
1897 *Ibid*.
1898 *Ibid*.
1899 *Ibid*.
1900 DRP 2015, p. I-8

alternatives that would not support the AVAP's recommended distribution of population density and building intensity within the West EOA is not improper. Rather, it is a reasonable and appropriate criterion when considered in the context of the AVAP's planning vision and Rural Preservation Strategy. Please see responses to Comments F.8-65 and F.8-72 for further discussion.

Response to Comment F.8-180A:

The document cited in this comment is acknowledged and will be provided in the record. The Commenter cites this document to support the statement that "Restored habitat has never been documented to support the full functioning ecosystem processes of undisturbed habitat." The document does not support this statement, but rather is limited to a discussion of the authors' experiences with restoration of El Segundo Blue Butterfly habitat for projects, and opinions regarding why some restoration fails and the elements required for efficacious restoration, specifically, historical accuracy, ecotype accuracy, and type conversion. Those proposed mitigation measures in the Draft EIR which include habitat restoration, require seed source from the immediate area and limit type conversion to non-native habitat. Furthermore, the existing habitat impacted by the Project is not undisturbed habitat. The Project site has been grazed and cultivated for many years and is substantially degraded with a greater percentage of non-native vegetation than native. As such, the mitigation efforts are required to produce equal of greater functioning value habitat, not equal to undisturbed habitat values, as described on page 5.7-188 of the Draft EIR. Lastly, habitat restoration is a method employed and approved as successful by resources agencies routinely as part of State and federal permitting processes.

Response to Comment F.8-181:

The Draft EIR mitigation measures do not rely on the Ranch-Wide Agreement (TRCRWA). The TRCRWA is only described and discussed as a regional planning tool[1901] which provides a basic understanding of planned uses for the area. All Project mitigation is independent of the TRCRWA, consistent with CEQA Guidelines and enforceable by the County, as set forth in the Mitigation Monitoring and Reporting Program (MMRP) included in Final EIR Appendix 2.0-C.Rev. The Mitigation Preserve described on pages 5.7-135 through 5.7-138 in Section 5.7.4 of the Draft EIR, includes lands that fall within the TRCRWA areas.[1902] The Project is able to use the TRCRWA lands to implement Project mitigation, but the Draft EIR does not take credit for preservation where a conservation easement already exists. The Draft EIR states that of the six areas of mitigation lands, two (Areas 3 and 4) are the subject of a Wildlife Conservation Board (WCB) conservation easement. Off-site mitigation lands acquired by the WCB are not eligible for passive mitigation credit; however, these lands are eligible mitigation lands for enhancement, restoration, and creation of biological values.[1903]

[1901] DRP 2017, pp. 5.7-16, -62, -63
[1902] Final EIR Appendix 5.7-E, Exhibit E
[1903] WCB Easement Sections 6(b)(1)(B); and 1 (jj); Final EIR Appendix 5.7-E, Exhibit R, P.2 Bullet 3

The WCB easement areas include 7,490 acres of grasslands, not 12,145 acres.[1904] While those areas continue to be available for enhancement, in response to comments and discussion with CDFW, the Applicant has added additional Antelope Valley grasslands for preservation within Tejon Ranch to ensure the 2:1 preservation ratio is met. The additional off-site grasslands mitigation area, Area 7, is depicted in revised Exhibit 5.7-10, and comprises 7,877 acres of additional preserved grasslands located within the contiguous preserved open space areas of Tejon Ranch. The WCB conservation easement areas also remain part of the open space mitigation lands for the Project, but MM 7-10 has been revised to clarify that these areas are available only for enhancement, restoration, and creation mitigation, and not for preservation. Additionally, as discussed in the responses to Comments B.4-17, B.4-43, B.4-60, B.4-63, F.3-12, F.3A-19, F.7-22, F.8-10, F.8-119, F.8-121, F.8-123, F.8-124, F.8-125, F.8-128, and G.12-3, with the addition of the new mitigation preservation lands, the 2:1 preservation ratio is met without enhancement activities on WCB lands. Therefore, the following text in the third paragraph of PDF 7-1 on pages 5.7-135 and 5.7-136, is hereby revised as follows:

> These areas combine to form an extensive regional mitigation preserve system of ~~27,408~~ 43,079 acres (see revised Exhibit 5.7-10, Mitigation Preserve). Detailed floral sampling was conducted within grasslands on the Project site including impact areas, as well as within the Mitigation Preserve (NRC 2006a, 2007a, 2007b, 2007c, 2008b). Generally, studies consisted of quadrat sampling (338 total quadrats) and analysis of data generated results on regional species composition, between-site species composition, and plant community-based analysis~~.~~ within grasslands on the Project site within the impact area and mitigation areas (NRC 2008b) and 2016, and 2017 site reconnaissance surveys over a period of ~~four~~ five days, within mitigation areas.

The following text in the first sentence of the fourth paragraph of PDF 7-1 on page 5.7-136, is hereby revised as follows:

> The proposed ~~27,408~~ 43,079-acre preserve system contains all major habitat types affected by the Project, as well as particular individual biological resource values which are described in each of the corresponding mitigation plans.

The following text in the second paragraph of PDF 7-2 on page 5.7-137, is hereby revised as follows:

> Mitigation lands for impacts to biological resources would consist of approximately ~~3,861~~ 3,866 acres of unimpacted~~/~~ SEA lands on the site and ~~23,547~~ 39,213 acres within additional off-site areas, ~~including~~ consisting of areas on Tejon Ranch, referred to as Areas 1 through ~~6~~7. These mitigation lands comprise two on-site and ~~six~~ seven off-site areas which would provide sufficient land and biological resources to implement mitigation strategies to

[1904] Revised Exhibit 5.7-10

fully mitigate for Project impacts. ~~Two~~ The majority of three of these areas, Areas 3 ~~and~~, 4, and 5, are the subject of the Wildlife Conservation Board conservation easements that expressly allow for such mitigation use of these lands. These areas, although available for mitigation activities that include enhancement, restoration, or creation, are not available for preserved mitigation acreage since the existing Conservation Easement already requires preservation (but allows mitigation use for enhancement, restoration, or creation).

The following text is hereby added after the ninth paragraph of PDF 7-2 on page 5.7-138:

Area 7 consists of two distinct areas that comprise 15,668 acres total. Area 7 is in Kern County on the northern slope of the Antelope Valley. The westernmost portion of Area 7 sits between Areas 3 and 4, while the easternmost portion occurs east of Area 4 and borders Area 6 to the north. Approximately half of Area 7 is dominated by undifferentiated grasslands, which are scattered throughout but mostly occurring in the southern half of this mitigation area. The other half of Area 7 is covered in various scrub types such as mixed chaparral, desert scrub, and sagebrush, and at higher elevations oak woodland, montane chaparral, montane hardwood-conifer forest, and pinyon-juniper forest. Several major northwest-to-southeast trending drainage features are found within Area 7 that contain riparian vegetation, oak woodland, and Joshua tree woodland.

The tenth paragraph of PDF 7-2 on page 5.7-138 is hereby revised as follows:

The combined off-site Mmitigation Ppreserve area amounts to ~~23,547~~ 39,213 acres of mitigation lands. In total, the mitigation preserve system available for mitigation covers ~~27,408~~ 43,079 acres and includes both on- and off-site mitigation areas. Appropriate lands with grassland resources have been included in the Mitigation Preserve to ensure a 2:1 replacement ratio in areas outside the existing WCB conservation easements. Furthermore, enhancement activities may be implemented within, but may not be limited to, Mitigation Preserve Areas 3, 4, and 5.

The following text in Section 5.7.6, Environmental Impacts, on page 5.7-160, is hereby revised as follows:

Implementation of MM 7-10 would reduce these impacts to less than significant levels through preservation of ~~14,375~~ 14,908 acres of on-site and off-site grasslands.

The following text in Section 5.7.6, Environmental Impacts, on page 5.7-160, is hereby revised as follows:

> The grassland mitigation is based on site-specific characteristics including, for example, the existence of native grasslands in the ~~27,408~~ 43,079-acre on-site (unimpacted/SEA lands) and off-site preserve areas.

The following text in Section 5.7.6, Environmental Impacts, on page 5.7-160, is hereby revised as follows:

> Specifically, the Project proposes to preserve ~~14,375~~ 14,908 acres of grasslands within the ~~27,404~~ 43,079-acre on-site (unimpacted~~/~~ SEA lands) and off-site mitigation preserve, which is part of a larger 240,000-acre conservation area (including dedication and acquisition areas).

The following text in the first paragraph and Table A of MM 7-10 on pages 5.7-180 and 5.7-181, is hereby revised as follows:

> The Project Applicant/Developer shall preserve grasslands, including native perennial grassland and associated wildflower field vegetation types, at a minimum 2:1 ratio within the ~~approximate 27,408-acre~~ M~~m~~itigation P~~p~~reserve (see Table A). The Project would impact 6,416 acres of grasslands; therefore, a total of 12,832 acres of grassland mitigation acreage is required to bring impacts to a less than significant level.

TABLE A
GRASSLAND MITIGATION ACREAGES

Mitigation Area	Grasslands	Total Acreage
On-Site Mitigation Preserve ~~Unimpacted/SEA~~		
On-Site Mitigation Preserve ~~Unimpacted/SEA~~	1,989	~~3,861~~ 3,866
Subtotal (Total On-Site Mitigation Area)	*1,989*	*~~3,861~~ 3,866*
Off-Site Mitigation Preserve ~~Open Space~~		
Area 1	~~1,641~~ 1,734	6,417
Area 2	~~1,602~~ 1,597	2,556
Area 3	~~3,059~~ 0	4,183
Area 4	~~4,429~~ 706	7,319
Area 5	~~643~~ 0	643
Area 6	~~1,012~~ 1,005	2,429
Area 7	7,877	15,668
Subtotal (Total Off-site Mitigation Area)	*~~12,386~~ 12,919*	*~~23,547~~ 39,213*
Total Mitigation Area	**~~14,375~~ 14,908****	**~~27,408~~ 43,079**
~~SEA: Significant Ecological Area~~		
**Goal for 2:1 Grassland Mitigation is 12,832 Acres		

The following text in the first sentence of the third paragraph of MM 7-10 on page 5.7-182, is hereby revised as follows:

> As outlined in Table A above, the ~~14,375~~ 14,908 acres of grassland preservation will occur in open space areas on site and in the ~~six~~ seven other areas.

The following text is hereby revised in the last paragraph of MM 7-10 on page 5.7-182 of the Draft EIR:

> The ~~open space~~ Mitigation P~~p~~reserve, including the grasslands within it, shall be preserved in perpetuity to offset Project impacts on native grasslands and wildflower fields prior to issuance of a grading permit for the Project site. The phasing of mitigation has been previously described. The preservation and management of these grasslands through the ~~Native Perennial Grassland and Wildflower Field Mitigation Plan~~ RWMP will sufficiently offset and fully mitigate the impacts on native grasslands and wildflower fields associated with the Project.

The following text in the last sentence of the third paragraph of MM 7-11 on pages 5.7-182 and 5.7-183, is hereby revised as follows:

> The combined acreage of oak woodland preserved both on site (unimpacted~~/~~ Significant Ecological Area [SEA]) and within the off-site mitigation areas is ~~3,102~~ 3,090 acres and is expected to substantially exceed the required 50 percent of mitigation as preservation.

Additionally, in an effort to make the grassland preservation management plan available, the Ranch-wide Management Plan (RWMP) shall be included in the Final EIR as a new appendix and the following edit is hereby made to page 5.7-62 of the Draft EIR.

> Under the TRCRWA, the Tejon Ranch Conservancy will adopt, update, monitor and enforce implementation of the Ranch-~~W~~wide Management Plan (RWMP) (Final EIR Appendix 5.7-D) on dedicated conservation areas and option areas subject to conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch.

See also, responses to Comments B.4-43, F.3A-18, F.3A-19, F.8-123, F.8-125, and F.8-128, regarding the grassland qualities of off-site mitigation lands.

Response to Comment F.8-182:

This comment inaccurately summarizes the Draft EIR analysis of potential Project indirect farmland impacts and does not accurately reflect the regional context of farmland in the Antelope Valley Area Plan (AVAP) planning area discussed in the Draft EIR and in the EIR certified by Los Angeles County in 2015 for the AVAP (SCH# 2014061043) (AVAP EIR). The AVAP was adopted by Los Angeles County in June 2015. The Draft EIR fully discloses and considers potential impacts related to the indirect, offsite conversion of farmland, identifies the potential magnitude of these impacts, and concludes that Project and related growth in the West Economic Opportunity Area (West EOA), which includes the Project area and other adjacent lands[1905], as specifically intended by the County in the adoption of the AVAP would result in significant impacts to prime, statewide important or unique farmland as required by Appendix G of the CEQA Guidelines. The Draft EIR also concludes that due to Project development in the West EOA, additional development could occur outside the West EOA and found that this would be significant, adverse indirect growth-inducing impact.[1906] Consistent with the findings made by Los Angeles County in the AVAP EIR, and in the EIR certified by the County for the current Los Angeles County General Plan 2035 adopted in October 2015 (SCH# 2011081042), the Draft EIR found that these impacts would remain significant and unavoidable due to the lack of feasible mitigation.

The analysis of potential farmland impacts in the Draft EIR is based on the regional Antelope Valley planning and growth context established by the County's General Plan and the AVAP,

[1905] DRP 2017, Exhibit 4-2a
[1906] *Id.,* p. 6-9

which is 1 of 11 community-based plans applicable to unincorporated County planning areas. The AVAP serves as the community plan applicable to the unincorporated area of the Antelope Valley, which covers a geographic area of 1,800 square miles, or 44 percent of the total County land area.[1907] In preparing the AVAP, the County undertook an extensive and inclusive 8-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[1908] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and formed the foundation of the AVAP.[1909] This community vision is embodied in the AVAP's "Rural Preservation Strategy," which is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment".[1910] The AVAP implements the Rural Preservation Strategy by identifying four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development".[1911]These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas (EOAs).[1912]

The Project site is located entirely within the AVAP West EOA.[1913] The AVAP defines EOAs as clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[1914] The AVAP Rural Preservation Strategy provides that major development in the AVAP "should be guided to [EOAs] so that the areas around them can be preserved and maintained at low density, or agricultural uses".[1915]

As required by CEQA, the AVAP EIR analyzed potential impacts to Prime Farmland, Farmland of Statewide Importance, and Unique Farmland identified by the California Farmland Mapping and Monitoring Program (FMMP). As discussed on pages 5.5-4 and 5.5-5 of the Draft EIR, these categories of mapped farmlands correspond with irrigated lands that have been in active cultivation during the prior two 2-year cycles of the FMMP. The Draft EIR[1916] and the AVAP EIR[1917] also identify Farmland of Local Importance, which are lands designated by the County Board of Supervisors and an advisory committee that do not meet the FMMP criteria for Prime Farmland or Farmland of Statewide Importance because they are not irrigated.[1918] The County has not amended the CEQA Appendix G thresholds of significance to include non-irrigated Farmland of Local Importance, and the AVAP and General Plan 2035

[1907] *Id.,* p. 5.8-10
[1908] DRP 2015, p. I-5
[1909] *Ibid*.
[1910] *Id.,* p. I-6
[1911] *Id.,* p. I-7; DRP 2014a, p. 7-7
[1912] *Ibid*.
[1913] DRP 2017, p. 4-4 and Exhibit 4-2a
[1914] DRP 2015, p. I-8
[1915] *Ibid*.
[1916] DRP 2017, Exhibit 5.5-1
[1917] DRP 2014a, Exhibit 5.2-1
[1918] DRP 2017, p. 5.5-5

EIRs certified by the County do not consider impacts to Farmland of Local Importance as potentially significant.[1919] Consequently, consistent with Appendix G of the CEQA guidelines, the AVAP and General Plan EIRs consider impacts to Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. These three categories of irrigated farmland are collectively referred to as "Important Farmland" in the AVAP EIR direct and indirect farmland impact analysis.[1920]

The AVAP EIR evaluated direct farmland impacts by considering the compatibility of the proposed land use designations in the AVAP with the continuation of agricultural activity within the 22,839 acres of Prime Farmland, 743 acres of Farmland of Statewide Importance, and 452 acres of Unique Farmland (24,034 total acres) that were identified by the FMMP within the AVAP planning area.[1921] The AVAP EIR considered that only the proposed RL10 (Rural Land, one dwelling unit per 10 gross acres) and RL20 (Rural Land, one dwelling unit per 20 gross acres) land use designations would be compatible with continued intensive commercial agriculture and that all other AVAP land use designations would be incompatible with continued agricultural use. The AVAP EIR assumed that all of the 24,034 acres of mapped farmland outside of the RL10 and RL20 designations would be converted to non-agricultural uses by buildout of the AVAP, including 5,968 acres of Prime Farmland, 133 acres of Farmland of Statewide Importance, and 68 acres of Unique Farmland (6,169 total acres).[1922] As shown on Exhibit 4-2A of the Draft EIR, none of the mapped farmland within the Project or immediately adjacent to the Project, including offsite mapped Prime Farmland located adjacent to the eastern edge of the Project between West Malinda and West Avenue B-8,[1923] is subject to the RL10 or RL20 designations. Consequently, these areas are included in the 6,169 total acres of farmland impacts identified in the AVAP EIR. The AVAP EIR found that the conversion 6,169 total acres of farmland would be a significant and unavoidable impact.[1924] The AVAP EIR also found that the buildout of the AVAP would indirectly result in the conversion of mapped Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to non-agricultural uses, notwithstanding AVAP goals and policies intended to protect farming operations from urbanization. These indirect farmland conversion impacts were also determined to be significant and unavoidable.[1925]

The analysis of farmland impacts in the Draft EIR was completed based on the independent review completed for this EIR, but it is noteworthy that this analysis is also consistent with the AVAP and the AVAP EIR analysis. As shown in Draft EIR Table 5.5-4, the Project includes 12,323 acres, of which 642 are mapped as Prime Farmland, 62 acres are mapped as disturbed or otherwise vacant lands, and 11,616 acres are mapped as grazing land by the FMMP. Although the Project is located entirely within the West EOA where growth is anticipated and focused in accordance with the AVAP Rural Preservation Strategy, approximately 5,624 acres (approximately 45.6 percent) of the Project site would be designated as open space, including natural resource protection, greenways, parks for active

[1919] DRP 2014a, Section 5.2.2, threshold AG-1
[1920] *Id.,* Section 5.2, Impacts 5.2-1 and 5.2-5
[1921] *Id.,* Table 5.2-3
[1922] *Ibid*.
[1923] DRP 2017, Exhibit 5.5-1
[1924] DRP 2014a, Section 5.2-9, Impact 5.2-1
[1925] *Id.,* Section 5.2-9, Impact 5.2-5

and passive recreational use, and the continuation of grazing in certain areas.[1926] In addition, as discussed on Draft EIR page 4-45, on June 17, 2008 the Tejon Ranch Company entered into a Conservation and Land Use Agreement (Agreement) with Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy that preserves approximately 90 percent of the 270,000-acre Ranch. The Project also includes 39,213 acres of offsite open space preserves within Tejon Ranch lands, including 8,973 acres in Los Angeles County.[1927] Project PDF 5-1 allows for continued grazing operations on portions of the Open Space preserve areas and the inclusion of a total of 50 acres of small-scale agriculture and agriculture-related uses (e.g., community gardens, farmers markets/fresh fruit and vegetable stands, growing and sales of nursery stock, commercial greenhouses) within the Project.[1928] Consequently, the Project will result in substantial preservation of mapped grazing land, the continuation of grazing, and continued agriculture within the West EOA, in addition to the significant conservation of natural and open space that will occur under the Conservation and Land Use Agreement and in the Project offsite open space preserves.

Contrary to the comment, which includes a partial, heavily edited quotation from the Draft EIR, the Draft EIR did not conclude that potential indirect farmland impacts would be less than significant. Indeed, the Draft EIR reached the same conclusions as the AVAP EIR only after completing an independent farmland analysis based on available data, which included but was not limited to the AVAP EIR analysis of this issue. The EIR independently weighed the evidentiary value of the AVAP EIR's information and analysis for the purposes of independently assessing the Project's potential impacts to farmland. The AVAP also provided a reasonable basis for predicting potential off-site and cumulative impacts within the AVAP region, but other important factors – such as the groundwater adjudication process completed for the Antelope Valley and the new state law requiring comprehensive and sustainable groundwater management (Sustainable Groundwater Management Act of 2014) were also considered as part of this EIR's independent evaluation of agricultural issues. Draft EIR Section 5.5, Threshold 5-5, page 5.5-18 states that "All physical direct and indirect impacts of Project implementation, both on-site and off-site, are addressed under Thresholds 5-1 and 5-4 [timberlands] above. There would be no other changes in the environment not addressed under Thresholds 5-1 and 5-4 that would indirectly result in conversion of Farmland to non- agricultural use or forest land to non-forest land use." Consistent with CEQA Guidelines Appendix G, the discussion in Threshold 5-1 of the Draft EIR discloses that Project development will directly impact 642 acres of mapped Prime Farmland within the site.[1929] The Draft EIR states that the Project impacts to Prime Farmland are included in the 6,169 total acres of farmland impacts, including 5,968 acres of mapped Prime Farmland, considered in the AVAP EIR.[1930] As discussed on page 5.5-14 of the Draft EIR Threshold 5-1 analysis, the Draft EIR states that "The Project is consistent with the intent of the AVAP's land use policy that anticipates conversion of Farmland on and proximate to

[1926] DRP 2017, Appendix 4.0-A, Section 3.13 and Table 2-16
[1927] *Id.,* Exhibit 4-12
[1928] *Id.,* p. 5.5-1
[1929] *Id.,* p. 5.5-12
[1930] *Id.,* pp. 7-13 and -14

the site, among other areas, and the Project would not result in any new impacts to agricultural lands not previously considered in the AVAP EIR." As discussed above, the analysis of farmland impacts in the AVAP EIR includes the conversion of all mapped Prime Farmland within and immediately adjacent to the Project and within the West EOA, as well the conversion of additional farmland to nonagricultural use notwithstanding AVAP goals and policies intended to protect farming operations from urbanization. The AVAP EIR found that both the direct and indirect impacts of farmland conversion, consistent with the implementation of the AVAP, would be significant and unavoidable.[1931] The Draft EIR analysis is consistent with the direct and indirect farmland impacts in the AVAP EIR analysis, and both direct and indirect Project farmland impacts are considered to be significant.

The Draft EIR discussion of potential indirect farmland impacts[1932] references the discussion of growth inducement in Draft EIR Section 6.0. As shown in Draft EIR Exhibits 4-2A and 5.5-1, there are areas of mapped Prime and Unique Farmland located outside of the Project area and outside of or adjacent to the West EOA boundary that could be subject to these indirect growth-inducing impacts. The Draft EIR found that the Project would have a significant, adverse growth-inducing impact due to the potential incentives to develop land outside the West EOA.[1933] In addition, the Draft EIR found that the Project would contribute to a cumulatively considerable impact related to farmland conversion even though the on-site conversion of 642 acres of prime farmland is part of the total of 6,169 acres farmland considered in the AVAP EIR.[1934] Consequently, the Draft EIR finds the Project's direct, indirect, and cumulative impacts to be significant.

As discussed above, the AVAP EIR found that the direct and indirect farmland impacts from the implementation of the AVAP, which includes Project development in the West EOA, would be significant and unavoidable. The County made several findings regarding the infeasibility of mitigating for farmland impacts in the AVAP EIR. First, the County found that, consistent with several, but not all court rulings (e.g., *Friends of the Kangaroo Rat v. California Department of Corrections* (August 18, 2003) Fifth Appellate District Number F040956), *County of Santa Cruz v. City of San Jose* (2003; WL No. 1566913) and *South County Citizens for Responsible Growth v. City of Elk Grove* (2004; WL No. 219789) as cited in the AVAP EIR), the preservation of offsite farmland in a mitigation bank, by easement or other means, does not mitigate for the onsite conversion of farmland to non-agricultural uses. The County also found that farmland impact mitigation is infeasible because most of Los Angeles County outside of the AVAP area is urbanized, mountainous or has other constraints, such as lack of water supply or lack of soil suitability that make commercial agriculture infeasible, and the use of mitigation banks or other programs to preserve offsite agriculture mitigation would require acquisition of land outside of Los Angeles County.[1935] As discussed on pages 5.5-13 and 5.5-14, the Draft EIR references and incorporates the mitigation feasibility analysis in the AVAP EIR. The Draft EIR further discussed the feasibility of mitigating for Project impacts to onsite prime farmland by establishing 642 acres of new farming areas on Tejon Ranch. As

[1931] DRP 2014a, Section 5.2-9, Impacts 5.2-1 and 5.2-5
[1932] DRP 2017, p. 5.5-18
[1933] *Id.,* p. 6-9
[1934] *Id.,* pp. 7-13 and -14
[1935] DRP 2014a, p. 5.2-24

discussed on Draft EIR page 5.5-14, such mitigation would be infeasible due to the implementation of the Tejon Ranch Conservation and Land Use Agreement, which preserves over 90 percent of Tejon Ranch, and the lack of sufficient locations on the remaining portions of the Ranch that could be cultivated to meet Prime Farmland standards. Consequently, consistent with the AVAP EIR, the Draft EIR determined that Project impacts to farmland, including direct, indirect and cumulative impacts, would remain significant and unavoidable.

The infeasibility of mitigating for agricultural impacts related to the Project and the implementation of the AVAP as discussed in the Draft EIR and the AVAP EIR is further supported by a Court-approved Adjudication Judgment and Physical Solution for the Antelope Valley Groundwater Basin entered in December 2015. As discussed in Draft EIR Section 5.18, Water Resources, a physical solution refers to agreed-upon or judicially imposed resolution of conflicting groundwater claims. The Adjudication Judgment and Physical Solution adopted for the Antelope Valley establishes a regional watermaster to regulate groundwater use consistent with applicable law and the total sustainable yield of the basin under the auspices of the court. As of January 2016, all groundwater users in the basin are required to begin a 7-year rampdown period during which groundwater production will be reduced to levels consistent with the total sustainable yield of approximately 110,000 afy. Among other provisions, the Adjudication Judgment and Physical Solution allows for interbasin groundwater transfers subject to Watermaster approval.[1936]

As discussed on Draft EIR page 5.5-6, over time agriculture and military uses have declined and urban land uses have emerged as the primary economic driver in the region. As discussed in Draft EIR Section 6.0, Growth-Inducing Impacts, the AVAP EIR projects that the full buildout of the AVAP in 2035 would result in 311,920 new residents and 81,441 new dwelling units in the Antelope Valley. The current Urban Water Management Plan adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site states that, although land uses within the Antelope Valley have historically focused primarily on agriculture, the Antelope Valley is in transition from predominantly agricultural uses to predominantly residential and industrial uses.[1937] As a result, since the 1980s there has been a rapid increase in the demand for municipal and industrial (M&I) water. In the 1990s, however, certain agricultural interests, including commercial carrot and onion farming entities, began operating in the Antelope Valley and significantly increased groundwater production demand in the region. Increased agricultural and M&I groundwater use reduced groundwater levels across the Antelope Valley basin and, starting in 1999, generated a legal conflict that resulted in the December 2015 Adjudication Judgment and Physical Solution.[1938]

The Adjudication Judgment and Physical Solution requires that all groundwater users in the Antelope Valley basin reduce production to levels determined by the Court to be sustainable

[1936] DRP 2017, Section 5.18.3; *Id.,* Appendix 5.18-D

[1937] Los Angeles County Waterworks District 40. 2017 (final version, February 2). UWMP (page 2-1). https://dpw.lacounty.gov/wwd/web/Documents/2015%20Integrated%20Urban%20Water%20Management%20Plan%20for%20the%20Antelope%20Valley.pdf.

[1938] *Id.,* p. 5-5

over a seven-year rampdown period starting in 2016. As shown in Exhibit 4 of Draft EIR Appendix 5.18-D, groundwater use by Antelope Valley senior rights holders (groundwater users with overlying production rights) will be reduced by over 40 percent at the end of the rampdown period. Two of the largest agricultural interests in the region, Bolthouse Properties LLC and Diamond Farming Co. LLC/Crystal Organic LLC/Grimmway/Lapis, will be required to reduce groundwater production from a pre-rampdown total of 20,160 afy to just 11,931 afy in accordance with the Adjudication Judgment and Physical Solution. As a result of these groundwater use limitations, future agricultural production is anticipated to be significantly reduced in the Antelope Valley. In addition, the groundwater transfer provisions of the Adjudication Judgment and Physical Solution will allow agricultural users to sell groundwater rights with the approval of the Watermaster to M&I and other users in the basin that are likely to value such supplies above the economic rates of return that can be obtained from water use for farming. The economic incentives to transfer groundwater rights would further reduce farming in the region.

In August 2017, the Antelope Valley Watermaster filed the first annual report required by the Adjudication Judgment and Physical Solution.[1939] The report states that the acreage of Antelope Valley under cultivation in the region has fallen by 32 percent from the levels reported in a 2010 expert report prepared in support of the adjudication.[1940] This result is consistent with the anticipated decline in Antelope Valley agriculture from continued urban growth, the significant reduction in groundwater production allowed by the Adjudication Judgment and Physical Solution, including groundwater use by agricultural producers, and economic incentives to transfer groundwater from agricultural to more highly-valued M&I uses over time.

In addition to the cases cited by the County in support of a CEQA lead agency's findings that agricultural preservation does not mitigate for onsite agricultural conversion, other cases have upheld CEQA findings that agricultural mitigation is infeasible in rapidly urbanizing regions, such as the AVAP area, due to economic factors. In *Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 350-351 ("*Beaumont*"), the California Court of Appeals upheld a determination by a CEQA lead agency that, due to continuing urban and suburban development, agricultural land values were increasing and agricultural landowners were under pressure to sell or convert their lands for development. As a result, the Court found that the CEQA lead agency "reasonably concluded that any measures to reduce the [project's] direct and cumulative adverse impacts on agricultural land uses ... would not have been economically feasible." The *Beaumont* court cited *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1269-1271, in which the appellate court upheld a CEQA lead agency's decision that a significant adverse impact to agricultural lands could not be feasibly mitigated due to the "negative economics" of long-term agriculture in the region, including "increasing land prices and environmental regulation, higher water and labor costs, higher property taxes, competition from other parts of the state and foreign countries, and growing urbanization." In *Masonite Corp. v. County of Mendocino*, (2013) 218 Cal. App. 4th 230, the appellate court held that while a CEQA lead agency cannot conclude as

[1939] Final Antelope Valley Watermaster 2016 Annual Report. 2017 (August 1). http://www.avek.org/fileLibrary/file_753.pdf.

[1940] *Id.,* pp. 34-35

a matter of law that agricultural impact mitigation is infeasible, it may, as is the case in the AVAP EIR and in the Draft EIR, make such a determination based on the applicable facts.

Consistent with these cases, there is substantial evidence in California that attempts to mitigate for farmland impacts by farmland preservation, such as mitigation banks or easements, can increase the likelihood that agriculture will be abandoned in rapidly growing regions. Riverside County for example, has experienced a long-term transformation from agricultural to urban land uses that is similar to the historical land uses changes in the AVAP area. During the CEQA review process of the 2003 Riverside County General Plan, the County attempted to mitigate for impacts to agricultural uses by limiting allowable development yields on existing farmland to reduce the attractiveness of future development, and by requiring payment into a proposed mitigation bank that would purchase permanent conservation easements on, and remove future development rights from, agricultural land. This proposed mitigation was strongly opposed by the Riverside County Farm Bureau, which submitted written comments to the County stating that "General Plan policies that the EIR states are intended to mitigate adverse impacts to agriculture would instead have the effect of driving agriculture out of business and converting agricultural resources to non-agricultural use. That is because, in urbanizing areas such as Riverside County, the viability of agriculture is dependent upon the economic value of the agricultural land. The General Plan policies and EIR MMs would substantially impact the economic value of agricultural land by, among other things, restricting development of agricultural land...and by preventing the conversion of agricultural land to other productive uses....In this way, the General Plan and EIR impair the agricultural landowner's access to capital necessary to invest in the agricultural operations, which in turn results in conversion of the agricultural resources to non- agricultural uses." The Bureau's comments concluded that the proposed bank and other measures would "have the effect of decreasing the economic base of agricultural operations and increasing the cost of community development on agricultural land with no meaningful mitigation for the impacts to agriculture within the County."[1941] Based on such evidence, Riverside County removed the proposed farmland mitigation measures from the General Plan and has subsequently determined that mitigation for farmland impacts in the County is infeasible.

Consequently, the Draft EIR determination that mitigation for farmland impacts is infeasible is based on substantial evidence, including Los Angeles County findings that offsite mitigation does not compensate for onsite farmland impacts, and that because the County is largely urbanized, mountainous, or has other lands that are subject to water, soil or other constraints that preclude intensive commercial agriculture in the County, mitigation for farmland impacts associated with the buildout of the AVAP, which includes the Project, is infeasible.[1942] In addition, The Draft EIR found that Project mitigation is infeasible because most of the land in the Tejon Ranch is already subject to a conservation agreement, and there is not sufficient land within the remaining development areas of the Ranch with suitable characteristics to support the establishment of new Prime Farmland to compensate for

[1941] Riverside County Farm Bureau. Comments on the Draft Program Environmental Impact Report ("PEIR") No. 441. http://www.riversidecfb.com/pdf/Magazine/october02.pdf.

[1942] DRP 2014a, Section 5.2.9, Impacts 5.2-1 and 5.2-5

onsite Project impacts.[1943] These findings are further supported by the implementation of the Antelope Valley Basin Adjudication Judgment and Physical Solution, which significantly reduces the amount of groundwater available for all users in the basin, including agriculture, and increases economic incentives for agricultural users to transfer groundwater rights to M&I users. In August 2017, the Watermaster reported that the acreage of agricultural lands under cultivation in the Antelope has already declined by 32 percent from the levels in a 2010 report prepared for the adjudication process. Recent court cases and evidence from rapidly growing, former agricultural regions similar to the AVAP area further support the fact that, due to the economics of urbanization, a CEQA lead agency can reasonably conclude that mitigation in the form of offsite preservation is economically infeasible or, as in Riverside County, potentially counterproductive to the continuation of agricultural activity.

In summary, the Draft EIR found that the Project's direct, indirect, and cumulative impacts to mapped farmlands, in accordance with the State CEQA Guidelines Appendix G thresholds utilized by Los Angeles County, would be significant and unavoidable. These findings are supported by substantial evidence in the record as prepared by the CEQA lead agency in the 2015 AVAP and Los Angeles County General Plan Update EIRs, the Adjudication Judgment and Physical Solution approved in December 2015 for the Antelope Valley Basin by the California Superior Court, evidence of significant agricultural acreage declines in the Antelope Valley reported by the Watermaster for the Antelope Valley Basin, and cases and evidence supporting CEQA determinations that agricultural mitigation is economically infeasible or may actually be counterproductive due to the economics of farming in rapidly urbanizing areas.

In response to the comment, Draft EIR Exhibit 5.5-1 is hereby revised to correct a typographical error in the legend as follows:

> ~~F~~ L – Farmland of Local Importance

This correction does not change any of the analysis or conclusions in the Draft EIR.

Response to Comment F.8-183:

The comment cites to a typographical error in the Draft EIR concerning the potential use of a 489-acre agricultural protection easement. As discussed in more detail below, the EIR's independent analysis of farmland impacts and the feasibility of mitigation in the Draft EIR was also consistent with the AVAP and the AVAP EIR analysis and mitigation for farmland impacts was determined to be infeasible. Consequently, the second full paragraph of text on Draft EIR page 5.5-13 is hereby revised as follows:

> Also, the Project would accommodate a total of 50 acres of small-scale agriculture and agriculture-related uses, including, but not limited to community gardens, farmers markets/fresh fruit and vegetable stands, growing and sales of nursery stock, and commercial greenhouses (PDF 5-1). However, these activities may or may not occur within the 642 acres of the site

[1943] DRP 2017, pp. 5.5-13 and -14

currently designated as Prime Farmland. ~~In addition, Tejon Ranch will put an agricultural preservation easement of not less than 489 acres of Prime and Unique farmland outside of the Project site, but on the Tejon Ranch property.~~

After weighing the evidentiary value of data and analysis set forth in the AVAP EIR for the purposes of independently assessing the Project's potential impacts to farmland, the Draft EIR came to the same conclusion as the AVAP EIR regarding such impacts, particularly with respect to off-site and cumulative farmland impacts. As shown in Draft EIR Table 5.5-4, the Project includes 12,323 acres, of which 642 are mapped as Prime Farmland, 62 acres are mapped as disturbed or otherwise vacant lands, and 11,616 acres are mapped as grazing land by the FMMP. Although the Project is located entirely within the West EOA, where growth is anticipated and focused in accordance with the AVAP Rural Preservation Strategy, approximately 5,624 acres (approximately 45.6 percent) of the Project site would be designated as open space, including natural resource protection, greenways, parks for active and passive recreational use, and the continuation of grazing in certain areas.[1944] In addition, as discussed on Draft EIR page 4-45, on June 17, 2008 the Tejon Ranch Company entered into a Conservation and Land Use Agreement (Agreement) with Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy that preserves approximately 90 percent of the 270,000-acre Ranch. The Project also includes 39,213 acres of offsite open space preserves within Tejon Ranch lands, including 8,973 acres in Los Angeles County.[1945] PDF 5-1 allows for continued grazing operations on portions of the Open Space preserve areas and the inclusion of a total of 50 acres of small-scale agriculture and agriculture-related uses (e.g., community gardens, farmers markets/fresh fruit and vegetable stands, growing and sales of nursery stock, commercial greenhouses) within the Project.[1946] Consequently, the Project will result in substantial preservation of mapped grazing land, the continuation of grazing, and continued agriculture within the West EOA in addition to the significant conservation of natural and open space that will occur under the Conservation and Land Use Agreement and in the Project offsite open space preserves.

Consistent with State CEQA Guidelines Appendix G, the discussion in Threshold 5-1 of the Draft EIR discloses that Project development will directly impact 642 acres of mapped Prime Farmland within the site.[1947] The Draft EIR states that the Project impacts to prime farmland are included in the 6,169 total acres of farmland impacts, including 5,968 acres of mapped Prime Farmland, considered in the AVAP EIR.[1948] As discussed above, the analysis of farmland impacts in the AVAP EIR includes the conversion of all mapped Prime Farmland within and immediately adjacent to the Project site and within the West EOA, as well the conversion of additional farmland to nonagricultural use notwithstanding AVAP goals and policies intended to protect farming operations from urbanization. The Draft EIR uses these forecasts to independently determine that the Project's direct and indirect impacts of

[1944] *Id.,* Appendix 4.0-A, Section 3.12 and Table 2-16
[1945] *Id.,* Exhibit 4-12
[1946] *Id.,* p. 5.5-1
[1947] *Id.,* p. 5.5-12
[1948] *Id.,* pp. 7-13 and -14

farmland conversion would be significant and unavoidable, consistent with the conclusion of the AVAP EIR.

The Draft EIR discussion of potential indirect farmland impacts[1949] references the discussion of growth inducement in Draft EIR Section 6.0, Growth-Inducing Impacts. As shown in Draft EIR Exhibits 4-2A and 5.5-1, there are areas of mapped Prime and Unique farmland located outside of the Project area and outside of or adjacent to the West EOA boundary that could be subject to these indirect growth-inducing impacts. The Draft EIR found that the Project would have a significant adverse growth-inducing impact due to the potential incentives to develop land outside the West EOA.[1950] In addition, the Draft EIR found that the Project would contribute to a cumulatively considerable impact related to farmland conversion even though the on-site conversion of 642 acres of prime farmland is part of the total of 6,169 acres farmland considered in the AVAP EIR.[1951] The Draft EIR concludes that the Project's direct, indirect, and cumulative impacts to farmland are all significant.

As discussed on Draft EIR pages 5.5-13 and 5.5-14, as part of its independent review, the Draft EIR references and incorporates the AVAP EIR's farmland impact mitigation feasibility analysis. The County made several findings regarding the infeasibility of mitigating for farmland impacts in the AVAP EIR. First, the County found that, consistent with several, but not all court rulings (e.g., *Friends of the Kangaroo Rat v. California Department of Corrections* (August 18, 2003) Fifth Appellate District Number F040956), *County of Santa Cruz v. City of San Jose* (2003; WL No. 1566913) and *South County Citizens for Responsible Growth v. City of Elk Grove* (2004; WL No. 219789) as cited in the AVAP EIR), the preservation of offsite farmland in a mitigation bank, by easement or other means, does not mitigate for the onsite conversion of farmland to non-agricultural uses. The County also found that farmland impact mitigation is infeasible because most of Los Angeles County outside of the AVAP area is urbanized, mountainous, or has other constraints, such as lack of water supply or lack of soil suitability that make commercial agriculture infeasible, and the use of mitigation banks or other programs to preserve offsite agriculture mitigation would require acquisition of land outside of Los Angeles County.[1952] The Draft EIR further discussed the feasibility of mitigating for Project impacts to onsite prime farmland by establishing 642 acres of new farming areas on Tejon Ranch. As discussed on Draft EIR page 5.5-14, such mitigation would be infeasible due to the implementation of the Tejon Ranch Conservation and Land Use Agreement, which preserves over 90 percent of Tejon Ranch, and the lack of sufficient locations on the remaining portions of the Ranch that could be cultivated to meet Prime Farmland standards. Consequently, consistent with the AVAP EIR, the Draft EIR independently determined that Project impacts to farmland, including direct, indirect, and cumulative impacts, would remain significant and unavoidable.

The infeasibility of mitigating for agricultural impacts related to the Project and the implementation of the AVAP as discussed in the Draft EIR and the AVAP EIR is further supported by a Court-approved Adjudication Judgment and Physical Solution for the

[1949] DRP 2017, p. 5.5-18
[1950] *Id.,* p. 6-9
[1951] *Id.,* pp. 7-13 and -14
[1952] DRP 2014a, p. 5.2-24

Antelope Valley Groundwater Basin entered in December 2015. As discussed in Draft EIR Section 5.18, Water Resources, a physical solution refers to agreed-upon or judicially imposed resolution of conflicting groundwater claims. The Adjudication Judgment and Physical Solution adopted for the Antelope Valley establishes a regional watermaster to regulate groundwater use consistent with applicable law and the total sustainable yield of the basin under the auspices of the court. As of January 2016, all groundwater users in the basin are required to begin a 7-year rampdown period during which groundwater production will be reduced to levels consistent with the total sustainable yield of approximately 110,000 afy. Among other provisions, the Adjudication Judgment and Physical Solution allows for interbasin groundwater transfers subject to Watermaster approval.[1953]

As discussed on Draft EIR page 5.5-6, over time agriculture and military uses have declined and urban land uses have emerged as the primary economic driver in the region. As discussed on Draft EIR page 6-8, the AVAP EIR projects that the full buildout of the AVAP in 2035 would result in 311,920 new residents and 81,441 new dwelling units in the Antelope Valley. The current Urban Water Management Plan (UWMP) adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site states that although land uses within the Antelope Valley have historically focused primarily on agriculture, the Antelope Valley is in transition from predominantly agricultural uses to predominantly residential and industrial uses.[1954] As a result, since the 1980s there has been a rapid increase in the demand for municipal and industrial (M&I) water. In the 1990s, however, certain agricultural interests, including commercial carrot and onion farming entities, began operating in the Antelope Valley and significantly increased groundwater production demand in the region. Increased agricultural and M&I groundwater use reduced groundwater levels across the Antelope Valley basin and, starting in 1999, generated a legal conflict that resulted in the December 2015 Adjudication Judgment and Physical Solution.[1955]

The Adjudication Judgment and Physical Solution requires that all groundwater users in the Antelope Valley basin reduce production to levels determined by the Court to be sustainable over a seven-year rampdown period starting in 2016. As shown in Exhibit 4 of Draft EIR Appendix 5.18-D, groundwater use by Antelope Valley senior rights holders (groundwater users with overlying production rights) will be reduced by over 40 percent at the end of the rampdown period. Two of the largest agricultural interests in the region, Bolthouse Properties LLC and Diamond Farming Co. LLC/Crystal Organic LLC/Grimmway/Lapis, will be required to reduce groundwater production from a pre-rampdown total of 20,160 afy to just 11,931 afy in accordance with the Adjudication Judgment and Physical Solution. As a result, agricultural production is anticipated to be significantly reduced in the Antelope Valley due to groundwater use limitations. In addition, the groundwater transfer provisions of the Adjudication Judgment and Physical Solution will allow agricultural users to sell groundwater rights with the approval of the Watermaster to M&I and other users in the basin that are likely to value such supplies above the economic rates of return that can be

[1953] DRP 2017, Section 5.18.3; see also DRP 2017, Appendix 5.18-D
[1954] Los Angeles County Waterworks District 40 2017, page 2-1
[1955] *Id.,* p. 5-5

obtained from water use for farming. The economic incentives to transfer groundwater rights would further reduce farming in the region.

In August 2017, the Antelope Valley Watermaster filed the first annual report required by the Adjudication Judgment and Physical Solution.[1956] The report states that the acreage of Antelope Valley under cultivation in the region has fallen by 32 percent from the levels reported in a 2010 expert report prepared in support of the adjudication.[1957] This result is consistent with the anticipated decline in Antelope Valley agriculture from continued urban growth, the significant reduction in groundwater production allowed by the Adjudication Judgment and Physical Solution, including groundwater use by agricultural producers, and economic incentives to transfer groundwater from agricultural to more highly-valued M&I uses over time.

In addition to the cases cited by the County in support of a CEQA lead agency's findings that agricultural preservation does not mitigate for onsite agricultural conversion, other cases have upheld CEQA findings that agricultural mitigation is infeasible in rapidly urbanizing regions, such as the AVAP area, due to economic factors. In *Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 350-351 ("*Beaumont*"), the California Court of Appeals upheld a determination by a CEQA lead agency that, due to continuing urban and suburban development, agricultural land values were increasing and agricultural landowners were under pressure to sell or convert their lands for development. As a result, the Court found that the CEQA lead agency "reasonably concluded that any measures to reduce the [project's] direct and cumulative adverse impacts on agricultural land uses ... would not have been economically feasible." The *Beaumont* court cited *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1269-1271, in which the appellate court upheld a CEQA lead agency's decision that a significant adverse impact to agricultural lands could not be feasibly mitigated due to the "negative economics" of long-term agriculture in the region, including "increasing land prices and environmental regulation, higher water and labor costs, higher property taxes, competition from other parts of the state and foreign countries, and growing urbanization." In *Masonite Corp. v. County of Mendocino*, (2013) 218 Cal. App. 4th 230, the appellate court held that while a CEQA lead agency cannot conclude as a matter of law that agricultural impact mitigation is infeasible, it may, as is the case in the AVAP EIR and in the Draft EIR, make such a determination based on the applicable facts.

Consistent with these cases, there is substantial evidence in California that attempts to mitigate for farmland impacts by farmland preservation, such as mitigation banks or easements, can increase the likelihood that agriculture will be abandoned in rapidly growing regions. For example, Riverside County has experienced a long-term transformation from agricultural to urban land uses that is similar to the historical land uses changes in the AVAP area. During the CEQA review process of the 2003 Riverside County General Plan, the County attempted to mitigate for impacts to agricultural uses by limiting allowable development yields on existing farmland to reduce the attractiveness of future development, and by requiring payment into a proposed mitigation bank that would purchase permanent

[1956] Final Antelope Valley Watermaster 2016 Annual Report. 2017 (August 1). http://www.avek.org/fileLibrary/file_753.pdf.

[1957] *Id.,* pp. 34-35

conservation easements on, and remove future development rights from, agricultural land. This proposed mitigation was strongly opposed by the Riverside County Farm Bureau, which submitted written comments to the County stating that "General Plan policies that the EIR states are intended to mitigate adverse impacts to agriculture would instead have the effect of driving agriculture out of business and converting agricultural resources to non-agricultural use. That is because, in urbanizing areas such as Riverside County, the viability of agriculture is dependent upon the economic value of the agricultural land. The General Plan policies and EIR MMs would substantially impact the economic value of agricultural land by, among other things, restricting development of agricultural land...and by preventing the conversion of agricultural land to other productive uses....In this way, the General Plan and EIR impair the agricultural landowner's access to capital necessary to invest in the agricultural operations, which in turn results in conversion of the agricultural resources to non- agricultural uses." The Bureau's comments concluded that the proposed bank and other measures would "have the effect of decreasing the economic base of agricultural operations and increasing the cost of community development on agricultural land with no meaningful mitigation for the impacts to agriculture within the County."[1958] Based on such evidence, Riverside County removed the proposed farmland MMs from the General Plan, and has subsequently determined that mitigation for farmland impacts in the County is infeasible.

Consequently, the Draft EIR determination that mitigation for farmland impacts is infeasible is based on substantial evidence, including Los Angeles County findings that offsite mitigation does not compensate for onsite farmland impacts, and that because the County is largely urbanized, mountainous, or has other lands that are subject to water, soil or other constraints that preclude intensive commercial agriculture in the County, mitigation for farmland impacts associated with the buildout of the AVAP, which includes the Project, is infeasible.[1959] In addition, the Draft EIR found that Project mitigation is infeasible because most of the land in the Tejon Ranch is already subject to a conservation agreement, and there is not sufficient land within the remaining development areas of the Ranch with suitable characteristics to support the establishment new Prime Farmland to compensate for onsite Project impacts.[1960] These findings are further supported by the implementation of the Antelope Valley Basin Adjudication Judgment and Physical Solution, which significantly reduces the amount of groundwater available for all users in the basin, including agriculture, and increases economic incentives for agricultural users to transfer groundwater rights to M&I users. In August 2017, the Watermaster reported that the acreage of agricultural lands under cultivation in the Antelope Valley has already declined by 32 percent from the levels in a 2010 report prepared for the adjudication process. Recent court cases and evidence from rapidly growing, former agricultural regions similar to the AVAP area further support the fact that, due to the economics of urbanization, a CEQA lead agency can reasonably conclude that mitigation in the form of offsite preservation is economically infeasible or, as in Riverside County, potentially counterproductive to the continuation of agricultural activity.

[1958] Riverside County Farm Bureau. Comments on the Draft Program Environmental Impact Report ("PEIR") No. 441. http://www.riversidecfb.com/pdf/Magazine/october02.pdf.

[1959] DRP 2014a, Section 5.2.9, Impacts 5.2-1 and 5.2-5

[1960] DRP 2017, pp. 5.5-13 and -14

In summary, the Draft EIR found that the Project's direct, indirect, and cumulative impacts to mapped farmlands in accordance with the State CEQA Guidelines Appendix G thresholds utilized by Los Angeles County, would be significant and unavoidable. These findings are supported by substantial evidence in the record as prepared by the CEQA lead agency in the 2015 AVAP and Los Angeles County General Plan Update EIRs, the Adjudication Judgment and Physical Solution approved in December 2015 for the Antelope Valley Basin by the California Superior Court, evidence of significant agricultural acreage declines in the Antelope Valley reported by the Watermaster for the Antelope Valley Basin, and cases and evidence supporting CEQA determinations that that agricultural mitigation is economically infeasible or may actually be counterproductive due to the economics of farming in rapidly urbanizing areas.

Response to Comment F.8-184:

As shown in Draft EIR Table 5.5-4, the Project includes 12,323 acres, of which 642 are mapped as Prime Farmland, 62 acres are mapped as disturbed or otherwise vacant lands, and 11,616 acres are mapped as grazing land by the FMMP. Although the Project is located entirely within the West EOA, where growth is anticipated and focused in accordance with the AVAP Rural Preservation Strategy, approximately 5,624 acres (approximately 45.6 percent) of the Project site would be designated as open space, including natural resource protection, greenways, parks for active and passive recreational use, and the continuation of grazing in certain areas.[1961] In addition, as discussed on Draft EIR page 4-45, on June 17, 2008 the Tejon Ranch Company entered into a Conservation and Land Use Agreement (Agreement) with Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy that preserves approximately 90 percent of the 270,000-acre Ranch. The Project also includes 39,213 acres of offsite open space preserves within Tejon Ranch lands, including 8,973 acres in Los Angeles County.[1962] PDF 5-1 allows for continued grazing operations on portions of the Open Space preserve areas and the inclusion of a total of 50 acres of small-scale agriculture and agriculture-related uses (e.g., community gardens, farmers markets/fresh fruit and vegetable stands, growing and sales of nursery stock, commercial greenhouses) within the Project.[1963] Consequently, the Project will result in substantial preservation of mapped grazing land, the continuation of grazing, and continued agriculture within the West EOA in addition to the significant conservation of natural and open space that will occur under the Conservation and Land Use Agreement and in the Project offsite open space preserves.

Consistent with State CEQA Guidelines Appendix G, the discussion in Threshold 5-1 of the Draft EIR discloses that Project development will directly impact 642 acres of mapped Prime Farmland within the site.[1964] The Draft EIR states that the Project impacts to Prime Farmland are included in the 6,169 total acres of farmland impacts, including 5,968 acres of mapped

[1961] *Id.,* Appendix 4.0-A, Section 3.12 and Table 2-16
[1962] *Id.,* Exhibit 4-12
[1963] *Id.,* p. 5.5-1
[1964] *Id.,* p. 5.5-12

Prime Farmland, considered in the AVAP EIR.[1965] As discussed above, the analysis of farmland impacts in the AVAP EIR includes the conversion of all mapped Prime Farmland within and immediately adjacent to the Project and within the West EOA, as well the conversion of additional farmland to nonagricultural use notwithstanding AVAP goals and policies intended to protect farming operations from urbanization. The Draft EIR uses these forecasts to independently determined that the Project's direct and indirect impacts of farmland conversion would be significant and unavoidable, consistent with the conclusions of the AVAP EIR.

The Draft EIR discussion of potential indirect farmland impacts[1966] references the discussion of growth inducement in Draft EIR Section 6.0, Growth-Inducing Impacts. As shown in Draft EIR Exhibits 4-2A and Exhibit 5.5-1, there are areas of mapped Prime and Unique Farmland located outside of the Project area and outside of or adjacent to the West EOA boundary that could be subject to these indirect growth-inducing impacts. The Draft EIR found that the Project would have a significant adverse growth-inducing impact due to the potential incentives to develop land outside the West EOA.[1967] In addition, the Draft EIR found that the Project would contribute to a cumulatively considerable impact related to farmland conversion even though the on-site conversion of 642 acres of prime farmland is part of the total of 6,169 acres farmland considered in the AVAP EIR.[1968] The Project's direct, indirect, and cumulative impacts to farmland are all considered to be significant in the Draft EIR.

As discussed on Draft EIR pages 5.5-13 and 5.5-14, as part of its independent review, the Draft EIR references and incorporates the AVAP EIR's farmland impact mitigation feasibility analysis The County made several findings regarding the infeasibility of mitigating for farmland impacts in the AVAP EIR. First, the County found that, consistent with several, but not all court rulings (e.g., *Friends of the Kangaroo Rat v. California Department of Corrections* (August 18, 2003) Fifth Appellate District Number F040956), *County of Santa Cruz v. City of San Jose* (2003; WL No. 1566913) and *South County Citizens for Responsible Growth v. City of Elk Grove* (2004; WL No. 219789) as cited in the AVAP EIR), the preservation of offsite farmland in a mitigation bank, by easement or other means does not mitigate for the onsite conversion of farmland to non-agricultural uses. The County also found that farmland impact mitigation is infeasible because most of Los Angeles County outside of the AVAP area is urbanized, mountainous, or has other constraints, such as lack of water supply or lack of soil suitability that make commercial agriculture infeasible, and the use of mitigation banks or other programs to preserve offsite agriculture mitigation would require acquisition of land outside of Los Angeles County.[1969] The Draft EIR further discussed the feasibility of mitigating for Project impacts to onsite Prime Farmland by establishing 642 acres of new farming areas on Tejon Ranch. As discussed on Draft EIR page 5.5-14, such mitigation would be infeasible due to the implementation of the Tejon Ranch Conservation and Land Use Agreement, which preserves over 90 percent of Tejon Ranch, and the lack of sufficient locations on the remaining portions of the Ranch that could be cultivated to meet Prime

[1965] *Id.,* pp. 7-13 and -14
[1966] DRP 2017, p. 5.5-18
[1967] *Id.,* p. 6-9
[1968] *Id.,* pp. 7-13 and -14
[1969] DRP 2014a, p. 5.2-24

Farmland standards. Consequently, consistent with the AVAP EIR, the Draft EIR independently determined that Project impacts to farmland, including direct, indirect, and cumulative impacts, would remain significant and unavoidable.

The infeasibility of mitigating for agricultural impacts related to the Project and the implementation of the AVAP as discussed in the Draft EIR and the AVAP EIR is further supported by a Court-approved Adjudication Judgment and Physical Solution for the Antelope Valley Groundwater Basin entered in December 2015. As discussed in Draft EIR Section 5.18, Water Resources, a physical solution refers to agreed-upon or judicially imposed resolution of conflicting groundwater claims. The Adjudication Judgment and Physical Solution adopted for the Antelope Valley establishes a regional watermaster to regulate groundwater use consistent with applicable law and the total sustainable yield of the basin under the auspices of the court. As of January 2016, all groundwater users in the basin are required to begin a 7-year rampdown period during which groundwater production will be reduced to levels consistent with the total sustainable yield of approximately 110,000 afy. Among other provisions, the Adjudication Judgment and Physical Solution allows for interbasin groundwater transfers subject to Watermaster approval.[1970]

As discussed on Draft EIR page 5.5-6, over time agriculture and military uses have declined and urban land uses have emerged as the primary economic driver in the region. As discussed on Draft EIR page 6-8, the AVAP EIR projects that the full buildout of the AVAP in 2035 would result in 311,920 new residents and 81,441 new dwelling units in the Antelope Valley. The current Urban Water Management Plan adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site states that although historically land uses within the Antelope Valley have focused primarily on agriculture, the Antelope Valley is in transition from predominantly agricultural uses to predominantly residential and industrial uses.[1971] As a result, since the 1980s there has been a rapid increase in the demand for municipal and industrial (M&I) water. In the 1990s, however, certain agricultural interests, including commercial carrot and onion farming entities, began operating in the Antelope Valley and significantly increased groundwater production demand in the region. Increased agricultural and M&I groundwater use reduced groundwater levels across the Antelope Valley basin and, starting in 1999, generated a legal conflict that resulted in the December 2015 Adjudication Judgment and Physical Solution.[1972]

The Adjudication Judgment and Physical Solution requires that all groundwater users in the Antelope Valley basin reduce production to levels determined by the Court to be sustainable over a seven-year rampdown period starting in 2016. As shown in Exhibit 4 of Draft EIR Appendix 5.18-D, groundwater use by Antelope Valley senior rights holders (groundwater users with overlying production rights) will be reduced by over 40 percent at the end of the rampdown period. Two of the largest agricultural interests in the region, Bolthouse Properties LLC and Diamond Farming Co. LLC/Crystal Organic LLC/Grimmway/Lapis, will be required to reduce groundwater production from a pre-rampdown total of 20,160 afy to

[1970] DRP 2017, Section 5.18.3; see also DRP 2017, Appendix 5.18-D
[1971] Los Angeles County Waterworks District 40 2017 p. 2-1
[1972] *Id.,* p. 5-5

just 11,931 afy in accordance with the Adjudication Judgment and Physical Solution. As a result of these groundwater use limitations, future agricultural production is anticipated to be significantly reduced in the Antelope Valley. In addition, the groundwater transfer provisions of the Adjudication Judgment and Physical Solution will allow agricultural users to sell groundwater rights with the approval of the Watermaster to M&I and other users in the basin that are likely to value such supplies above the economic rates of return that can be obtained from water use for farming. The economic incentives to transfer groundwater rights would further reduce farming in the region.

In August 2017, the Antelope Valley Watermaster filed the first annual report required by the Adjudication Judgment and Physical Solution.[1973] The report states that the acreage of Antelope Valley under cultivation in the region has fallen by 32 percent from the levels reported in a 2010 expert report prepared in support of the adjudication.[1974] This result is consistent with the anticipated decline in Antelope Valley agriculture from continued urban growth, the significant reduction in groundwater production allowed by the Adjudication Judgment and Physical Solution, including groundwater use by agricultural producers, and economic incentives to transfer groundwater from agricultural to more highly-valued M&I uses over time.

In addition to the cases cited by the County in support of a CEQA lead agency's findings that agricultural preservation does not mitigate for onsite agricultural conversion, other cases have upheld CEQA findings that agricultural mitigation is infeasible in rapidly urbanizing regions, such as the AVAP area, due to economic factors. In *Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 350-351 ("*Beaumont*"), the California Court of Appeals upheld a determination by a CEQA lead agency that, due to continuing urban and suburban development, agricultural land values were increasing and agricultural landowners were under pressure to sell or convert their lands for development. As a result, the Court found that the CEQA lead agency "reasonably concluded that any measures to reduce the [project's] direct and cumulative adverse impacts on agricultural land uses ... would not have been economically feasible." The *Beaumont* court cited *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1269-1271, in which the appellate court upheld a CEQA lead agency's decision that a significant adverse impact to agricultural lands could not be feasibly mitigated due to the "negative economics" of long-term agriculture in the region, including "increasing land prices and environmental regulation, higher water and labor costs, higher property taxes, competition from other parts of the state and foreign countries, and growing urbanization." In *Masonite Corp. v. County of Mendocino*, (2013) 218 Cal. App. 4th 230 the appellate court held that while a CEQA lead agency cannot conclude as a matter of law that agricultural impact mitigation is infeasible, it may, as is the case in the AVAP EIR and in the Draft EIR, make such a determination based on the applicable facts.

Consistent with these cases, there is substantial evidence in California that attempts to mitigate for farmland impacts by farmland preservation, such as mitigation banks or easements, can increase the likelihood that agriculture will be abandoned in rapidly growing

[1973] Final Antelope Valley Watermaster 2016 Annual Report. 2017 (August 1). http://www.avek.org/fileLibrary/file_753.pdf.

[1974] *Id.,* pp. 34-35

regions. For example, Riverside County has experienced a long-term transformation from agricultural to urban land uses that is similar to the historical land uses changes in the AVAP area. During the CEQA review process of the 2003 Riverside County General Plan, the County attempted to mitigate for impacts to agricultural uses by limiting allowable development yields on existing farmland to reduce the attractiveness of future development, and by requiring payment into a proposed mitigation bank that would purchase permanent conservation easements on, and remove future development rights from, agricultural land. This proposed mitigation was strongly opposed by the Riverside County Farm Bureau, which submitted written comments to the County stating that "General Plan policies that the EIR states are intended to mitigate adverse impacts to agriculture would instead have the effect of driving agriculture out of business and converting agricultural resources to non-agricultural use. That is because, in urbanizing areas such as Riverside County, the viability of agriculture is dependent upon the economic value of the agricultural land. The General Plan policies and EIR mitigation measures would substantially impact the economic value of agricultural land by, among other things, restricting development of agricultural land...and by preventing the conversion of agricultural land to other productive uses....In this way, the General Plan and EIR impair the agricultural landowner's access to capital necessary to invest in the agricultural operations, which in turn results in conversion of the agricultural resources to non- agricultural uses." The Bureau's comments concluded that the proposed bank and other measures would "have the effect of decreasing the economic base of agricultural operations and increasing the cost of community development on agricultural land with no meaningful mitigation for the impacts to agriculture within the County."[1975] Based on such evidence, Riverside County removed the proposed farmland MMs from the General Plan, and has subsequently determined that mitigation for farmland impacts in the County is infeasible.

Consequently, the Draft EIR determination that mitigation for farmland impacts is infeasible is based on substantial evidence, including Los Angeles County findings that offsite mitigation does not compensate for onsite farmland impacts, and that because the County is largely urbanized, mountainous, or has other lands that are subject to water, soil or other constraints that preclude intensive commercial agriculture in the County, mitigation for farmland impacts associated with the buildout of the AVAP, which includes the Project, is infeasible.[1976] In addition, the Draft EIR found that Project mitigation is infeasible because most of the land in the Tejon Ranch is already subject to a conservation agreement, and there is not sufficient land within the remaining development areas of the Ranch with suitable characteristics to support the establishment new prime farmland to compensate for onsite Project impacts.[1977] These findings are further supported by the implementation of the Antelope Valley Basin Adjudication Judgment and Physical Solution, which significantly reduces the amount of groundwater available for all users in the basin, including agriculture, and increases economic incentives for agricultural users to transfer groundwater rights to M&I users. In August 2017, the Watermaster reported that the acreage of agricultural lands under cultivation in the Antelope Valley has already declined by 32 percent from the levels

[1975] Riverside County Farm Bureau. Comments on the Draft Program Environmental Impact Report ("PEIR") No. 441. http://www.riversidecfb.com/pdf/Magazine/october02.pdf.

[1976] DRP 2014a, Section 5.2.9, Impacts 5.2-1 and 5.2-5

[1977] DRP 2017, pp. 5.5-13 and -14

in a 2010 report prepared for the adjudication process. Recent court cases and evidence from rapidly growing, former agricultural regions similar to the AVAP area further support the fact that, due to the economics of urbanization, a CEQA lead agency can reasonably conclude that mitigation in the form of offsite preservation is economically infeasible or, as in Riverside County, potentially counterproductive to the continuation of agricultural activity.

In summary, the Draft EIR found that the Project's direct, indirect and cumulative impacts to mapped farmlands in accordance with the State CEQA Guidelines Appendix G thresholds utilized by Los Angeles County would be significant and unavoidable. These findings are supported by substantial evidence in the record as prepared by the CEQA lead agency in the 2015 AVAP and Los Angeles County General Plan Update EIRs, the Adjudication Judgment and Physical Solution approved in December 2015 for the Antelope Valley Basin by the California Superior Court, evidence of significant agricultural acreage declines in the Antelope Valley reported by the Watermaster for the Antelope Valley Basin, and cases and evidence supporting CEQA determinations that agricultural mitigation is economically infeasible or may actually be counterproductive due to the economics of farming in rapidly urbanizing areas.

Response to Comment F.8-185:

The analysis of potential farmland impacts in the Draft EIR is based on the regional Antelope Valley planning and growth context established by the County's General Plan and the AVAP, which is one of 11 community-based plans applicable to unincorporated County planning areas. The AVAP serves as the community plan applicable to the unincorporated area of the Antelope Valley, which covers a geographic area of 1,800 square miles, or 44 percent of the total County land area.[1978] In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[1979] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[1980] This community vision is embodied in the AVAP's "Rural Preservation Strategy," which is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment".[1981] The AVAP implements the Rural Preservation Strategy by identifying four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development".[1982] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas (EOAs).[1983]

[1978] *Id.,* p. 5.8-9
[1979] DRP 2015, p. I-5
[1980] *Ibid*.
[1981] *Id.,* p. I-6
[1982] *Id.,* p. I-7; DRP 2014, p. 7-7
[1983] *Ibid*.

The Project site is located entirely within the AVAP West EOA.[1984] The AVAP defines EOAs as clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[1985] The AVAP Rural Preservation Strategy provides that major development in the AVAP "should be guided to [EOAs] so that the areas around them can be preserved and maintained at low density, or agricultural uses".[1986]

As required by Appendix G of the State CEQA Guidelines, the AVAP EIR analyzed potential impacts to Prime Farmland, Farmland of Statewide Importance, and Unique Farmland identified by the California Farmland Mapping and Monitoring Program (FMMP). As discussed on Draft EIR pages 5.5-4 and 5.5-5, these categories of mapped farmlands correspond with irrigated lands that have been in active cultivation during the prior two 2-year cycles of the FMMP. These three categories of irrigated farmland are collectively referred to as "Important Farmland" in the AVAP EIR and the Draft EIR.[1987]

The Draft EIR reached the same conclusions as the AVAP EIR after weighing the evidentiary value of the AVAP EIR's information and analysis for the purposes of independently assessing the Project's potential impacts to farmland, particularly with respect to off-site and cumulative farmland impacts. The AVAP EIR evaluated direct farmland impacts by considering the compatibility of the proposed land use designations in the AVAP with the continuation of agricultural activity within the 22,839 acres of prime farmland, 743 acres of Farmland of Statewide Importance, and 452 acres of Unique Farmland (24,034 total acres) that were identified by the FMMP within the AVAP planning area.[1988] The AVAP EIR considered that only the proposed RL10 (Rural Land, one dwelling unit per 10 gross acres) and RL20 (Rural Land, one dwelling unit per 20 gross acres) land use designations would be compatible with continued intensive commercial agriculture and that all other AVAP land use designations would be incompatible with continued agricultural use. The AVAP EIR assumed that all of the 24,034 acres of mapped farmland outside of the RL10 and RL20 designations would be converted to non-agricultural uses by buildout of the AVAP, including 5,968 acres of Prime Farmland, 133 acres of Farmland of Statewide Importance, and 68 acres of Unique Farmland (6,169 total acres).[1989] As shown on Exhibit 4-2A of the Draft EIR, none of the mapped farmland within the Project or immediately adjacent to the Project site, including offsite mapped Prime Farmland located adjacent to the eastern edge of the Project between West Malinda and West Avenue B-8[1990] is subject to the RL10 or RL20 designations. Consequently, these areas are included in the 6,169 total acres of farmland impacts identified in the AVAP EIR. The AVAP EIR found that the conversion 6,169 total acres of farmland would be a significant and unavoidable impact.[1991] The AVAP EIR also found that the buildout of the AVAP would indirectly result in the conversion of mapped Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to non-agricultural uses, notwithstanding

1984 DRP 2017, p. 4-4 and Exhibit 4-2a
1985 DRP 2015, p. I-8
1986 *Ibid*.
1987 DRP 2014a, Section 5.2.9, Impacts 5.2-1 and 5.2-5
1988 *Id.,* p. 5.5-5
1989 *Ibid*.
1990 DRP 2017, Exhibit 5.5-1
1991 DRP 2014a, Section 5.2-9, Impact 5.2-1

AVAP goals and policies intended to protect farming operations from urbanization. These indirect farmland conversion impacts were also determined to be significant and unavoidable.[1992]

As shown in Draft EIR Table 5.5-4, the Project includes 12,323 acres, of which 642 are mapped as Prime Farmland, 62 acres are mapped as disturbed or otherwise vacant lands, and 11,616 acres are mapped as grazing land by the FMMP. Although the Project is located entirely within the West EOA, where growth is anticipated and focused in accordance with the AVAP Rural Preservation Strategy, approximately 5,624 acres (approximately 45.6 percent) of the Project site would be designated as open space, including natural resource protection, greenways, parks for active and passive recreational use, and the continuation of grazing in certain areas.[1993] In addition, as discussed on Draft EIR page 4-45, on June 17, 2008 the Tejon Ranch Company entered into a Conservation and Land Use Agreement (Agreement) with Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy that preserves approximately 90 percent of the 270,000-acre Ranch. The Project also includes 39,213 acres of offsite open space preserves within Tejon Ranch lands, including 8,973 acres in Los Angeles County.[1994] Further, PDF 5-1 allows for continued grazing operations on portions of the Open Space preserve areas and the inclusion of a total of 50 acres of small-scale agriculture and agriculture-related uses (e.g., community gardens, farmers markets/fresh fruit and vegetable stands, growing and sales of nursery stock, commercial greenhouses) within the Project.[1995] Consequently, the Project will result in substantial preservation of mapped grazing land, the continuation of grazing, and continued agriculture within the West EOA in addition to the significant conservation of natural and open space that will occur under the Conservation and Land Use Agreement and in the Project offsite open space preserves.

Consistent with State CEQA Guidelines Appendix G, the discussion in Threshold 5-1 of the Draft EIR discloses that Project development will directly impact 642 acres of mapped Prime Farmland within the site.[1996] The Draft EIR states that the Project impacts to Prime Farmland are included in the 6,169 total acres of farmland impacts, including 5,968 acres of mapped Prime Farmland, considered in the AVAP EIR.[1997] As discussed above, the analysis of farmland impacts in the AVAP EIR includes the conversion of all mapped Prime Farmland within and immediately adjacent to the Project and within the West EOA, as well the conversion of additional farmland to nonagricultural use notwithstanding AVAP goals and policies intended to protect farming operations from urbanization. The Draft EIR uses these forecasts to independently determine that the Project's direct and indirect impacts of farmland conversion would be significant and unavoidable, consistent with the conclusions of the AVAP EIR.

1992 *Id.,* Section 5.2-9, Impact 5.2-5
1993 DRP 2017, Appendix 4.0-A, Section 3.13 and Table 2-16
1994 DRP 2017, Exhibit 4-12
1995 *Id.,* p. 5.5-1
1996 *Id.,* p. 5.5-12
1997 *Id.,* pp. 7-13 and -14

The Draft EIR discussion of potential indirect farmland impacts[1998] references the discussion of growth inducement in Draft EIR Section 6.0, Growth-Inducing Impacts. As shown in Draft EIR Exhibits 4-2A and 5.5-1, there are areas of mapped Prime and Unique Farmland located outside of the Project area and outside of or adjacent to the West EOA boundary that could be subject to these indirect growth-inducing impacts. The Draft EIR found that the Project would have a significant adverse growth-inducing impact due to the potential incentives to develop land outside the West EOA.[1999] In addition, the Draft EIR found that the Project would contribute to a cumulatively considerable impact related to farmland conversion even though the on-site conversion of 642 acres of Prime Farmland is part of the total of 6,169 acres of farmland considered in the AVAP EIR.[2000] The Draft EIR concludes that the Project's direct, indirect, and cumulative impacts to farmland are all significant.

As discussed on Draft EIR pages 5.5-13 and 5.5-14, the Draft EIR references and incorporates the farmland impact mitigation feasibility analysis in the AVAP EIR. The AVAP EIR found that the direct and indirect farmland impacts from the implementation of the AVAP, which includes Project development in the West EOA, would be significant and unavoidable.[2001] The County made several findings regarding the infeasibility of mitigating for farmland impacts in the AVAP EIR. First, the County found that, consistent with several, but not all court rulings (e.g., *Friends of the Kangaroo Rat v. California Department of Corrections* (August 18, 2003) Fifth Appellate District Number F040956), *County of Santa Cruz v. City of San Jose* (2003; WL No. 1566913) and *South County Citizens for Responsible Growth v. City of Elk Grove* (2004; WL No. 219789) as cited in the AVAP EIR), the preservation of offsite farmland in a mitigation bank, by easement or other means does not mitigate for the onsite conversion of farmland to non-agricultural uses. The County also found that farmland impact mitigation is infeasible because most of Los Angeles County outside of the AVAP area is urbanized, mountainous, or has other constraints, such as lack of water supply or lack of soil suitability that make commercial agriculture infeasible, and the use of mitigation banks or other programs to preserve offsite agriculture mitigation would require acquisition of land outside of Los Angeles County.[2002] The Draft EIR further discussed the feasibility of mitigating for Project impacts to onsite Prime Farmland by establishing 642 acres of new farming areas on Tejon Ranch. As discussed on Draft EIR page 5.5-14, such mitigation would be infeasible due to the implementation of the Tejon Ranch Conservation and Land Use Agreement, which preserves over 90 percent of Tejon Ranch, and the lack of sufficient locations on the remaining portions of the Ranch that could be cultivated to meet prime farmland standards. Consequently, consistent with the AVAP EIR, the Project EIR determined that Project impacts to farmland, including direct, indirect and cumulative impacts, would remain significant and unavoidable.

The infeasibility of mitigating for agricultural impacts related to the Project and the implementation of the AVAP as discussed in the Draft EIR and the AVAP EIR is further supported by a Court-approved Adjudication Judgment and Physical Solution for the

1998 DRP 2017, p. 5.5-18
1999 *Id.,* p. 6-9
2000 *Id.,* pp. 7-13 and -14
2001 DRP 2014a, Section 5.2.9, Impacts 5.2-1 and 5.2-5
2002 *Id.,* p. 5.2-24

Antelope Valley Groundwater Basin entered in December 2015. As discussed in Draft EIR Section 5.18, Water Resources, a physical solution refers to agreed-upon or judicially imposed resolution of conflicting groundwater claims. The Adjudication Judgment and Physical Solution adopted for the Antelope Valley establishes a regional watermaster to regulate groundwater use consistent with applicable law and the total sustainable yield of the basin under the auspices of the court. As of January 2016, all groundwater users in the basin are required to begin a 7-year rampdown period during which groundwater production will be reduced to levels consistent with the total sustainable yield of approximately 110,000 afy. Among other provisions, the Adjudication Judgment and Physical Solution allows for interbasin groundwater transfers subject to Watermaster approval.[2003]

As discussed on Draft EIR page 5.5-6, over time agriculture and military uses have declined and urban land uses have emerged as the primary economic driver in the region. As discussed on Draft EIR page 6-8, the AVAP EIR projects that the full buildout of the AVAP in 2035 would result in 311,920 new residents and 81,441 new dwelling units in the Antelope Valley. The current Urban Water Management Plan adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site states that although land uses within the Antelope Valley have historically focused primarily on agriculture, the Antelope Valley is in transition from predominantly agricultural uses to predominantly residential and industrial uses.[2004] As a result, since the 1980s there has been a rapid increase in the demand for municipal and industrial (M&I) water. In the 1990s, however, certain agricultural interests, including commercial carrot and onion farming entities, began operating in the Antelope Valley and significantly increased groundwater production demand in the region. Increased agricultural and M&I groundwater use reduced groundwater levels across the Antelope Valley basin and, starting in 1999, generated a legal conflict that resulted in the December 2015 Adjudication Judgment and Physical Solution.[2005]

The Adjudication Judgment and Physical Solution requires that all groundwater users in the Antelope Valley basin reduce production to levels determined by the Court to be sustainable over a seven-year rampdown period starting in 2016. As shown in Exhibit 4 of Draft EIR Appendix 5.18-D, groundwater use by Antelope Valley senior rights holders (groundwater users with overlying production rights) will be reduced by over 40 percent at the end of the rampdown period. Two of the largest agricultural interests in the region, Bolthouse Properties LLC and Diamond Farming Co. LLC/Crystal Organic LLC/Grimmway/Lapis, will be required to reduce groundwater production from a pre-rampdown total of 20,160 afy to just 11,931 afy in accordance with the Adjudication Judgment and Physical Solution. As a result, agricultural production is anticipated to be significantly reduced in the Antelope Valley due to groundwater use limitations. In addition, the groundwater transfer provisions of the Adjudication Judgment and Physical Solution will allow agricultural users to sell groundwater rights with the approval of the Watermaster to M&I and other users in the basin that are likely to value such supplies above the economic rates of return that can be

[2003] DRP 2017, Section 5.18.3 and Appendix 5.18-D
[2004] Los Angeles County Waterworks District 40 2017, p. 2-1
[2005] *Id.,* p. 5-5

obtained from water use for farming. The economic incentives to transfer groundwater rights would further reduce farming in the region.

In August 2017, the Antelope Valley Watermaster filed the first annual report required by the Adjudication Judgment and Physical Solution.[2006] The report states that the acreage of Antelope Valley under cultivation in the region has fallen by 32 percent from the levels reported in a 2010 expert report prepared in support of the adjudication.[2007] This result is consistent with the anticipated decline in Antelope Valley agriculture from continued urban growth, the significant reduction in groundwater production allowed by the Adjudication Judgment and Physical Solution, including groundwater use by agricultural producers, and economic incentives to transfer groundwater from agricultural to more highly-valued M&I uses over time.

In addition to the cases cited by the County in support of a CEQA lead agency's findings that agricultural preservation does not mitigate for onsite agricultural conversion, other cases have upheld CEQA findings that agricultural mitigation is infeasible in rapidly urbanizing regions, such as the AVAP area, due to economic factors. In *Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 350-351 ("*Beaumont*"), the California Court of Appeals upheld a determination by a CEQA lead agency that, due to continuing urban and suburban development, agricultural land values were increasing and agricultural landowners were under pressure to sell or convert their lands for development. As a result, the Court found that the CEQA lead agency "reasonably concluded that any measures to reduce the [project's] direct and cumulative adverse impacts on agricultural land uses ... would not have been economically feasible." The *Beaumont* court cited *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1269-1271, in which the appellate court upheld a CEQA lead agency's decision that a significant adverse impact to agricultural lands could not be feasibly mitigated due to the "negative economics" of long-term agriculture in the region, including "increasing land prices and environmental regulation, higher water and labor costs, higher property taxes, competition from other parts of the state and foreign countries, and growing urbanization." In *Masonite Corp. v. County of Mendocino*, (2013) 218 Cal. App. 4th 230, the appellate court held that while a CEQA lead agency cannot conclude as a matter of law that agricultural impact mitigation is infeasible, it may, as is the case in the AVAP EIR and in the Draft EIR, make such a determination based on the applicable facts.

Consistent with these cases, there is substantial evidence in California that attempts to mitigate for farmland impacts by farmland preservation, such as mitigation banks or easements, can increase the likelihood that agriculture will be abandoned in rapidly growing regions. For example, Riverside County has experienced a long-term transformation from agricultural to urban land uses that is similar to the historical land uses changes in the AVAP area. During the CEQA review process of the 2003 Riverside County General Plan, the County attempted to mitigate for impacts to agricultural uses by limiting allowable development yields on existing farmland to reduce the attractiveness of future development, and by requiring payment into a proposed mitigation bank that would purchase permanent

[2006] Final Antelope Valley Watermaster 2016 Annual Report. 2017 (August 1). http://www.avek.org/fileLibrary/file_753.pdf.

[2007] *Id.,* pp. 34-35

conservation easements on, and remove future development rights from, agricultural land. This proposed mitigation was strongly opposed by the Riverside County Farm Bureau, which submitted written comments to the County stating that "General Plan policies that the EIR states are intended to mitigate adverse impacts to agriculture would instead have the effect of driving agriculture out of business and converting agricultural resources to non-agricultural use. That is because, in urbanizing areas such as Riverside County, the viability of agriculture is dependent upon the economic value of the agricultural land. The General Plan policies and EIR MMs would substantially impact the economic value of agricultural land by, among other things, restricting development of agricultural land...and by preventing the conversion of agricultural land to other productive uses....In this way, the General Plan and EIR impair the agricultural landowner's access to capital necessary to invest in the agricultural operations, which in turn results in conversion of the agricultural resources to non- agricultural uses." The Bureau's comments concluded that the proposed bank and other measures would "have the effect of decreasing the economic base of agricultural operations and increasing the cost of community development on agricultural land with no meaningful mitigation for the impacts to agriculture within the County."[2008] Based on such evidence, Riverside County removed the proposed farmland MMs from the General Plan, and has subsequently determined that mitigation for farmland impacts in the County is infeasible.

Consequently, the Draft EIR determination that mitigation for farmland impacts is infeasible is based on substantial evidence, including Los Angeles County findings that offsite mitigation does not compensate for onsite farmland impacts, and that because the County is largely urbanized, mountainous, or has other lands that are subject to water, soil or other constraints that preclude intensive commercial agriculture in the County, mitigation for farmland impacts associated with the buildout of the AVAP, which includes the Project, is infeasible.[2009] In addition, the Draft EIR found that Project mitigation is infeasible because most of the land in the Tejon Ranch is already subject to a conservation agreement, and there is not sufficient land within the remaining development areas of the Ranch with suitable characteristics to support the establishment new Prime Farmland to compensate for onsite Project impacts.[2010] These findings are further supported by the implementation of the Antelope Valley Basin Adjudication Judgment and Physical Solution, which significantly reduces the amount of groundwater available for all users in the basin, including agriculture, and increases economic incentives for agricultural users to transfer groundwater rights to M&I users. In August 2017, the Watermaster reported that the acreage of agricultural lands under cultivation in the Antelope Valley has already declined by 32 percent from the levels in a 2010 report prepared for the adjudication process. Recent court cases and evidence from rapidly growing, former agricultural regions similar to the AVAP area further support the fact that, due to the economics of urbanization, a CEQA lead agency can reasonably conclude that mitigation in the form of offsite preservation is economically infeasible or, as in Riverside County, potentially counterproductive to the continuation of agricultural activity.

[2008] Riverside County Farm Bureau. Comments on the Draft Program Environmental Impact Report ("PEIR") No. 441. http://www.riversidecfb.com/pdf/Magazine/october02.pdf.

[2009] DRP 2014a, Section 5.2.9, Impacts 5.2-1 and 5.2-5

[2010] DRP 2017, pp. 5.5-13 and -14

In summary, the Draft EIR found that the Project's direct, indirect, and cumulative impacts to mapped farmlands in accordance with the State CEQA Guidelines Appendix G thresholds utilized by Los Angeles County would be significant and unavoidable. These findings are supported by substantial evidence in the record as prepared by the CEQA lead agency in the 2015 AVAP and Los Angeles County General Plan Update EIRs, the Adjudication Judgment and Physical Solution approved in December 2015 for the Antelope Valley Basin by the California Superior Court, evidence of significant agricultural acreage declines in the Antelope Valley reported by the Watermaster for the Antelope Valley Basin, and cases and evidence supporting CEQA determinations that agricultural mitigation is economically infeasible or may actually be counterproductive due to the economics of farming in rapidly urbanizing areas.

Response to Comment F.8-186:

The comment inaccurately indicates that the hydrology and hydromodification analysis in Draft EIR Section 5.2, Hydrology and Flood, is primarily based on an Erosion Potential (Ep) analysis. In fact, the analysis is also based on the frequency and sediment transport analyses provided in Draft EIR Appendix 5.2-A, Centennial Master Plan Hydrology, Section 5.5, pages 31 to 36, conducted in accordance with the methods in the Los Angeles County Low Impact Development (LID) Manual. The frequency analysis was performed in accordance with Section 8.3 of the LID Standards Manual, and the sediment transport analysis was performed in accordance with Section 8.4 of the LID Standards Manual at the site boundaries to demonstrate that no drainage impacts would occur to off-site property. Hydrologic input data for these calculations were based on XPSWMM simulations of the existing and proposed Project conditions, including the proposed regional infiltration basins, for the LID, 2-, 5-, 10-, 25-, and 50-year storm events. Hydraulic calculations were performed using the one-dimensional HEC-RAS models (version 5.0.3) for the receiving channel locations where Project runoff discharges off-site.[2011]

As stated on page 5.2-23 of the Draft EIR, the Ep methodology is an alternative requirement for conforming with the hydromodification requirements in the County LID Manual. There is a strong correlation demonstrated in the scientific literature between calculated Ep and geomorphic channel instability, which supports the use of the Ep methodology for analyzing potential hydromodification impacts. The hydromodification control performance standard used in the Draft EIR includes the Ep methodology as well as the hydrology and hydraulic frequency analyses for the LID, 2-, 5-, 10-, 25-, and 50-year storm events in accordance with Section 8.3 of the LID Standards Manual and the sediment transport analysis of natural drainage systems with a capital flood flow rate greater than 5,000 cubic feet per second (cfs) that receive Project discharge in accordance with Section 8.4 of the LID Standards Manual.

As discussed on page 5.2-36, the Draft EIR includes an analysis of flow conditions and volumes for peak events at node locations downstream of the proposed regional infiltration basin locations, as well as at multiple nodes located at points upstream of the Project boundaries and the regional infiltration basins. This analysis integrated pre- and post-development impervious surface data into the delineation of each watershed based on

[2011] *Id.,* Figure 5.2-6

proposed land uses and the proposed grading plan. Post-development watersheds were further subdivided as necessary to meet the County 40- to 60-acre analysis size requirement. The hydrology analysis method and pre-and post-development analysis results area described in more detail in the Centennial Master Plan Hydrology, Draft EIR Appendix 5.2-A. Appendix 3 of the study provides representative maps of the pre-development watersheds, subareas, channel reaches, and flow analysis points used in the analysis. Appendix 4 of the study provides representative maps of the post-development (proposed conditions) watersheds, subareas, channel reaches, and flow analysis points. The detailed results for these upstream and internal Project nodes are included in Draft EIR Appendix 5.2-A, Appendix 3, Existing Conditions XPSWMM Model Summary and Results, and Appendix 4, Proposed Conditions XPSWMM Model Summary and Results. The results of this analysis show that post-development flow discharges and runoff volumes for the vast majority of upstream in-stream locations will decrease and not increase compared with existing conditions. The table below summarizes the pre- and post-development analysis results for nodes located upstream and within the Project based on the calculations provided in Draft EIR Appendix 5.2-A, Appendices 3 and 4. As discussed on Draft EIR pages 5.2-31 to 5.2-33 and in Section 5.3, Mitigation and Sediment Management Measures, of Draft EIR Appendix 5.18-A, instream drop structures/grade controls would be used as control measures to reduce or maintain the overall erosive work of the stream at the few upstream locations where post-development flow and runoff volume would increase.

Pre- and Post-Development Flow Comparison

Location	Pre-development Flow (cfs)	Post-development Flow (cfs)
Oso Creek XS-1	2446.4	2446.3
Oso Creek XS-2	8902.5	8844.1
Tentrock XS-3	9884.5	9433.1
Tentrock/Horsecamp XS-4	9143.2	2484.6
Cow Springs XS-7	4547.9	2104.9
East Tributary XS-5	468.3	42.7
East Tributary XS-6	697.4	197.5
East Tributary XS-9	680.9	315.8

Response to Comment F.8-187:

Draft EIR page 5.2-23 discloses that hydromodification impacts can cause channel erosion, migration, or sedimentation unless managed and controlled. Based on an analysis of pre- and post-development hydrological and watercourse conditions, Draft EIR Section 5.2 demonstrates that with implementation of the mitigation measures that will be included in the Mitigation Monitoring and Reporting Plan (MMRP) that will be adopted by the County, including MMs 2-1, 2-2, and 4-2, and compliance with all applicable laws and regulations, potential impacts from existing drainage pattern alterations that could result in substantial erosion or siltation on or off the site will be less than significant.

The Draft EIR evaluation of potential hydrologic or hydromodification impacts for streams in the northernmost portions of the Project referred to as East Tributary 7, East Tributary 8, and East Tributary 9 (catchments of interest) properly considers the fact that these drainages are located within the depositional alluvial fan entering the Antelope Valley floor to the northeast. The channels situated on this alluvial fan are considered to be losing streams because they disappear as channel runoff infiltrates into the permeable alluvium. These alluvial channels have also historically moved as they have filled up with deposited sediment during large magnitude storm events and flow paths in these areas are erratic and undefined. For example, the area within the East Tributary 8 catchment used to be tributary to the East Tributary 2 channel, and at another point in time drained to the Tentrock Creek channel. In the existing condition, much of the alluvial fan has been modified for agricultural use, roadways, and the California Aqueduct. Currently, the catchments of interest are not clearly associated with any particular defined channels, and thus have been distinguished individually. For the pre-developed conditions, these East Tributary watersheds 7, 8 and 9 were identified individually. However, for the post-development conditions, the areas associated with the East Tributary 7, 8, and 9 catchments have been grouped into the most appropriate watershed nearby. This more clearly reflects the post-developed drainage conditions and infiltration basins.

In the post-developed condition, the catchments of interest in these areas will be routed to Basin 24 (as shown on Draft EIR Exhibit 5.2-4) with engineered storm drains and channels and then discharged through the 292nd Street Aqueduct Crossing. Regardless of whether defined channels exist in the East Tributary 7, 8, and 9 catchment areas, these drainages are not considered receiving channels of concern because they would not be subject to Project development area runoff discharges under post-development conditions.

Response to Comment F.8-188:

This comment's assertion regarding the potential public health effects of air pollution is noted. The Draft EIR discloses and describes in detail the potential health effects of each criteria pollutant on pages 5.11-3 through 5.11-11 and analyzes the potential health impacts of criteria pollutant emissions on sensitive receptors on pages 5.11-21 through 5.11-22, 5.11-36 through 5.11-37, 5.11-63 through 5.11-64, 5.11-68 through 5.11-74, and 7-20.

This comment's assertion that, in the U.S., government estimates indicate that between 10 and 12 percent of total health costs can be attributed to air pollution is noted, as is its

assertion that many plants and trees, including agricultural crops, are injured by air pollutants. The Draft EIR discloses that the emission of certain criteria pollutants can have adverse effects on the ability of some plants to produce and store food, their aesthetic qualities, plant growth, and crop yields.[2041] This comment's assertion that wildlife and habitat is adversely impacted by air pollution, including aquatic species and habitats exposed to acid raid, is also noted. The Draft EIR discloses that the emission of certain criteria pollutants can have an adverse impact on ecosystems, making certain habitats more susceptible to certain diseases, other pollutants, harsh weather, and impacting species diversity.[2042]

In support of this comment's statement regarding acid rain, the Commenter cites a webpage hosted by the U.S. Environmental Protection Agency (EPA) that generally describes the chemical components, causes, and effects of acid rain, and which indicates that ground-borne deposits from acid rain can be flushed into aquatic environments as stormwater runoff and thereby harm fish. As discussed in Section 5.4, *Water Quality*, certain toxic pollutants from stormwater runoff can bioaccumulate in fish and other aquatic organisms at levels that are harmful to both the organism itself and the organisms that prey upon these species (including humans).[2043] However, the Draft EIR explains that the Project will not significantly contribute to bioaccumulation of pollutants in major downstream waters, including the Santa Clara River, because these waters are located several miles from the site, and constituent concentrations in Project runoff that may discharge from on-site facilities will be significantly below all applicable water quality objectives of the Lahontan and Los Angeles Basin Plans and the California Toxic Rule, 40 CFR 131.38.[2044] With mitigation identified in the EIR, potential Project bioaccumulation impacts to aquatic life or human health will be less than significant.[2045]

In support of this comment's assertion that greenhouse gas emissions contribute to human-induced climate change, the Commenter cites to a website hosted by the EPA that generally describes the causes of climate change, including greenhouse gas emissions. The Commenter's assertion is consistent with the Draft EIR, which explains that global climate change is caused in part by greenhouse gas emissions generated by human and industrial activity.[2046]

In support of this comment's assertion that "poor air quality that contributed to climate change will in turn worsen the impacts of climate and attendant air pollution problems," the Commenter cites a May 2016 document prepared by the Bay Area Air Quality Management District (BAAQMD) titled *Planning Healthy Places, A Guidebook for Addressing Local Sources of Air Pollutants in Community Planning*. This document explains that climate change may cause increased temperatures and drought conditions which could increase the frequency of wildfires that contribute air pollution that adversely affects humans. This conclusion is consistent with Section 5.21.3 of the Draft EIR, which describes the adverse effects of climate

2041 DRP 2017, p. 5.11-5
2042 *Ibid.*
2043 *Id.*, p. 5.4-86
2044 *Id.*, p. 5.4-87
2045 *Ibid.*
2046 *Id.*, p. 5.21-4

change. BAAQMD's *Planning Health Places* document also recommends various planning "best practices" of the type that will be implemented by the Project to reduce its impacts related to climate change, including but not limited to clustered, mixed-use development patterns, transportation demand strategies, encouraging the use of construction equipment that meet CARB's Tier 4 emissions standards, and imposing buffer areas between residential uses and freeways. Thus, the Project is consistent with the cited document.

However, CEQA requires an assessment of the impacts that a project will have on the environment (*see,* e.g., CEQA §21002(a)). As the California Supreme Court recently confirmed, CEQA does not generally require an analysis of the environment's impact on a project, unless the project itself "exacerbates" this existing environmental condition.[2047] In an earlier, related appellate court decision regarding the effects of global climate change in potentially affecting sea level rise which could in turn affect the Project, CEQA was determined not to require an evaluation of climate change impacts on the Project.[2048] The Draft EIR accordingly does not address predictions by some experts of worsening air pollution conditions attributable to global warming as a potential future environmental condition that may affect the Project. The Project's GHG impacts and the correlation between GHG emissions and global climate change is addressed throughout Section 5.21, Climate Change.

The South Coast Air Quality Management District (SCAQMD) submitted a letter to the County, dated July 13, 2017, indicating that it reviewed the Draft EIR and determined that the Project "will provide a broad range of residential (including affordable housing), commercial, institutional, recreational, and employment-generating land use types, which will make nearly half of daily vehicle trips occur within the proposed project area." The SCAQMD letter goes on to state that the Project "exemplifies the [County's] leadership in promoting sustainable communities" and that it "supports the goals" of SCAQMD's 2016 Air Quality Management Plan (AQMP) and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the Basin" (*see* Comment D.4-2). In addition, the Antelope Valley Air Quality Management District (AVAQMD) submitted a letter to the County, dated May 26, 2017, indicating that it reviewed and had no comments on the Draft EIR (*see* Comment Letter D.1).

Response to Comment F.8-189:

This comment's assertion that some of the nation's most polluted counties are in Southern California is noted; however; the Commenter's claim that Los Angeles County "tops the list" is inaccurate. In support of this assertion, the Commenter cites the American Lung Association's (ALA) 2016 report State of the Air. In the ALA report's list of *People at Risk in 25 Counties Most Polluted by Short-Term Particle Pollution (24-hour PM2.5)*, Kern County is ranked first and Los Angeles County is not ranked at all. In the ALA report's list of *People at Risk in 25 Counties Most Polluted by Year-Round Particle Pollution (Annual PM2.5)*, Kern County is ranked first and Los Angeles County is ranked 16th. In the ALA report's list of *People*

[2047] *California Bldg. Indus. Ass'n. v. Bay Area Air Quality Mgmt. Dist. ("CBIA")* (2015) 62 Cal.4th 369, 386
[2048] *Ballona Wetlands Land Trust et al. v. City of Los Angeles* (2011) 201 Cal.App.4th 455 ("Ballona")

at Risk in 25 Most Ozone-Polluted Counties, San Bernardino County is ranked first and Los Angeles County is ranked 4th.

It should also be noted that the ALA report states that over half of the nation's citizens live in counties that have unhealthful levels of either ozone or particulate pollution. Given that Los Angeles County is by far the most populated county in the United States (with nearly twice the population of Cook County, IL, the nation's next largest county), its unique air quality challenges are common knowledge and well documented. However, the ALA report cited by the Commenter confirms that air quality in the Los Angeles metropolitan area is significantly improving over time, with the City of Los Angeles reporting its lowest pollution levels ever in 2016. Nevertheless, as disclosed in Section 5.11, *Air Resources*, the Project site straddles the South Coast and Mojave Desert air basins and both basins are designated as non-attainment for certain state and federal air quality standards, including standards for particulate matter and ozone.[2049]

This comment's assertion that air pollution and its impacts are felt most heavily by sensitive receptors (e.g., children, the elderly) is accurate and was disclosed in the Draft EIR on page 5.11-29. This comment's assertion that very low-income populations are more susceptible to adverse health effects related to air pollution is also correct. Low income populations tend to live in areas with lower housing costs, which tend to be areas with higher rates of pollution, as discussed in response to Comment F.8-20. These same populations are also susceptible to displacement caused by land use policy that directs new housing development to infill urban locations near transit infrastructure, as demonstrated by SCAG's 2012 RTP/SCS EIR, and those who are not displaced will likely face increased adverse air quality impacts as neighborhoods densify.[2050] Indeed, housing insecurity of the type caused by California's current housing shortage – is closely associated with poor health among low income populations. Research demonstrates that housing and economic insecurity is correlated with cost-related prescription drug and healthcare nonadherence, as well as a host of physical and mental illnesses, including hypertension, arthritis, and depression, among other adverse health effects.[2051],[2052] The adverse public health effects associated with California's current housing crisis will likely continue because the state is already building 100,000 fewer units annually than are needed to provide adequate affordable housing.[2053] The Project contributes to the County's effort to address its share of the statewide housing crisis.

As this comment correctly notes, and as explained on the Draft EIR page 5.11-3, emission sources include transportation, industry and manufacturing, construction, goods movement,

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2049 *Id.,* pp. 5.11-24 and -25

2050 Garzon, C. 2011. *At a Crossroads in Our Region's Health: Freight Transport and the Future of Community Health in the San Francisco Bay Area*. Pacific Institute. Oakland, CA: http://pacinst.org/wp-content/uploads/2013/02/at-a-crossroads-for-health-full-report.pdf.

2051 Pollack, C., Griffin, B., Lynch, J., 2010, *Housing Affordability and Health Among Homeowners and Renters*, American Journal of Preventive Medicine, doi: 10.1016/j.amepre.2010.08.002.

2052 Osypuk, T., Caldwell, C., Platt, R., Misra, D., 2012, *The Consequences of Foreclosure for Depressive Symptomatology*, Elsevier Inc., doi:10.1016/j.annepidem.2012.04.012.

2053 Gamboa, J., Gallegos, H. 2017 (July 7). *Opinion: We must build more affordable homes in California.* East Bay Times. Walnut Creek, CA: http://www.eastbaytimes.com/2017/07/07/opinion-we-must-build-more-affordable-homes-in-california/.

and energy generation and use. This comment also correctly notes that transportation is one of the most significant sources of urban pollution, as discussed in response to Comment F.8-20.

With regards to transportation emissions, particulate matter is the primary source of localized air quality impacts associated with transportation emissions. Existing emissions generated by non-Project-related traffic traveling along SF-138 present the biggest potential risk to Project residents and visitors. In *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 269 (*CBIA v. BAAQMD*), the California Supreme Court held that CEQA generally does not require the Draft EIR to analyze how existing environmental conditions (*e.g.*, existing air pollutants generated by SR-138 traffic) might impact the Project's future users or residents. Nevertheless, the Draft EIR does analyze the potential impacts of air pollutants generated by off-site sources on people who will live and work at the proposed Project site. Though not legally required to do so, per *CBIA v. BAAQMD*, in the interest of full disclosure, the Draft EIR evaluates the potential adverse impacts of toxic air contaminants (TACs) and particulate matter exposure generated by existing off-site sources at pages 5.11-71 through 5.11-74. In addition, Draft EIR Appendix 5.11-C includes an HRA that assesses the potential health risks for new and existing sensitive receptors near SR-138.

The HRA used the Centennial Specific Plan's land use plan to determine the Project-site location of all future sensitive receptors that would be located within 500 feet of SR-138, and evaluated cancer risk from particulate matter using a receptor grid with 40-meter spacing.[2054] The 500-foot buffer was selected on the basis of the California Air Resources Board's (CARB) 2005 guidance manual on land use development, *Air Quality and Land Use: A Community Perspective*.[2055] The CARB guidance manual recommends a 500-foot buffer between freeways and sensitive receptors, indicating that further analysis may be in order if the proposed sensitive receptor is located within this buffer.[2056]

With respect to diesel particulate matter exposure from vehicles traveling on SR-138, the HRA shows that incremental cancer risks for the 70-year exposure duration are below 10 in 1 million at locations greater than 150 feet from the travel lanes and thus would not exceed applicable thresholds of significance.[2057] The estimated hazard index for all proposed sensitive receptors would be significantly less than one at locations greater than 150 feet from the SR-138 travel lanes and thus would not exceed applicable thresholds of significance.[2058] This determination is consistent with the Antelope Valley Area Plan EIR, which concluded that potential adverse effects to sensitive receptors located in proximity to SR-138 would be less than significant with mitigation.[2059] Moreover, as more stringent vehicular greenhouse gas emissions and criteria air pollution standards take effect, and as transportation fuels and vehicles become cleaner over time, the number of diesel powered

2054 DRP 2017, Appendix 5.11-C, pp. 2 and 3
2055 *Id.,* p. 1
2056 *Ibid.*
2057 *Id.,* p. 5.11-73; *Id.,* Appendix 5.11-C, p. 4
2058 *Ibid.*
2059 DRP 2014a, p. 5.3-43

vehicles on roadways as well as emissions from remaining newer diesel engines are expected to further reduce diesel-related health risks at the Project site.[2060]

To address the potential impact to sensitive receptors located within 150 feet of the SR-138 travel lanes, MM 11-10 imposes a 150-foot buffer from such travel lanes within which the Project will be prohibited from siting new sensitive receptor uses. As an added layer of protection, MM 11-11 further requires that prior to future tract map approvals, if any sensitive receptors (e.g. residential, day care, schools, hospitals) would be located within 500 feet of the SR-138 or a high-volume roadway, an additional dispersion modeling study must be conducted to estimate diesel PM air concentrations. If the study finds that diesel PM TAC emissions would be significant at the location of a proposed sensitive receptor, then effective TAC reduction measures must be implemented to mitigate for interior air quality, such as filtration technologies or equivalent protections against TACs from mobile emissions.

In addition, MM 11-11 has been revised in response to Comment D.4-8 to further ensure that TAC exposure to sensitive receptors are minimized at the Project site, as follows:

MM 11-11 Prior to the approval of any tract map that includes an air quality sensitive receptor (e.g. residential, day care, schools, hospital) located within 500 feet of the SR-138 and/or any "high volume roadway" (i.e., a roadway with an average daily traffic volume that equals or exceeds 50,000 vehicles), the Project Applicant/Developer shall provide to the Air Pollution Control District(s) with jurisdiction over the mapped area a dispersion analysis prepared in accordance with each applicable Air District's methodological requirements to calculate the health risks from vehicle emissions from SR-138 and/or high volume roadway, as relevant. If the study concludes that ~~health risks would be significant at the location of a proposed sensitive receptor~~ any sensitive receptor exposure would equal or exceed 20 in 1 million for cancer risk or 1.0 for non-cancer indices (or future more stringent thresholds as may be adopted by the applicable Air District(s) and approved by the County for use on projects subject to the County's lead agency authority under the California Environmental Quality Act)(District TAC Thresholds), then the applicant shall submit a Toxic Air Contaminant (TAC) Emission Reduction Plan to the applicable Air District(s) for review and concurrence. Following review and concurrence by the applicable Air District(s), a copy of the TAC Emission Reduction Plan, confirming that no sensitive receptors on the Project site will be exposed to TAC risks in excess of District TAC Thresholds, shall be provided to the Los Angeles County Department of Regional Planning, prior to County approval of the tentative tract map. In the TAC Emission Reduction Plan,

[2060] DRP 2017, pp. 5.21-7, -8, -23

> TAC exposure reduction measures shall be implemented to assure that no sensitive receptors are exposed to TAC-related health impacts that equal or exceed District TAC Thresholds. TAC exposure reduction measures include, but are not limited to, setbacks, vegetative barriers, heating, ventilation and air conditioning (HVAC) system filtration technologies, etc., and shall be required as a condition of approval for the tentative tract map, and/or required as a condition prior to issuance of a building permit approval for future sensitive use(s) included in the tentative tract map. ~~effective design measures must be implemented into the structures to mitigate for interior air quality, such as ventilation systems that include MERV13 filters or equivalent protections against TACs from vehicle emissions. Confirmation of compliance shall be provided to the County prior to occupancy that include sensitive receptors within 500 feet of the SR-138.~~

As shown above, MM 11-11 has been revised to, among other things, require preparation of a dispersion analysis to calculate the health risks from mobile emissions whenever the Project proposes a tentative map that would locate sensitive receptors within 500 feet of a "high-volume" roadway (i.e., a roadway with an average daily traffic volume that equals or exceeds 50,000 vehicles), in addition to SR-138.

The Project site is located approximately one mile east of Interstate 5.[2061] Thus, the Project site falls well beyond the outer boundary of every buffer area recommended by CARB to protect sensitive receptors from existing sources of emissions, including but not limited to the CARB-recommended 500-foot buffer for high-volume roadways.[2062] Accordingly, emissions associated with vehicle travel on I-5 would not pose a significant health risk to sensitive receptors within the Project site.

Localized impacts related to CO emissions (CO "hotspots") are also analyzed when there is a potential for severe traffic congestion at high-volume, signalized intersections, as analyzed in Section 5.11.7 of the Air Resources chapter.[2063] Based on the data in the Project's Traffic Study, under 2035 With Project conditions, traffic volumes at affected high-volume, signalized intersections are substantially below the daily traffic volumes that would be expected to generate CO exceedances and this potential impact would be less than significant.[2064]

Unlike air quality impacts related to particulate matter and CO hotspots, impacts related to other non-attainment pollutants in the South Coast and Mojave Desert air basins are regional in nature, rather than localized concerns. Information about these pollutants is set forth in

[2061] *Id.,* p. 1-5
[2062] CARB 2005, Table 1-1
[2063] DRP 2017, pp. 5.11-40 to -78
[2064] *Id.,* p. 5.11-62

Section 5.11.4[2065] and in Section 5.11.7.[2066] As discussed in Section 5.8.2 of the Land Use chapter[2067] and within Section 5.8.6 of the Land Use chapter,[2068] the SCAG 2016 RTP/SCS and accompanying EIR, the Project site has been reviewed and designated for new urbanized growth as part of a comprehensive regional planning process that takes into consideration compliance with criteria pollutant ambient air quality standards, GHG emission reduction mandates, as well as all other environmental impact factors. The SCAG 2016 RTP/SCS and its accompanying certified EIRs were included as references in the Draft EIR and it has remained available on the SCAG website. As discussed in response to Comment F.8-20, the 2016 RTP/SCS was approved by CARB as meeting applicable legal mandates in 2016. The RTP/SCS is also incorporated into the mobile source components of SCAQMD's Air Quality Management Plan (AQMP) and the State Implementation Plan.

In 2016, the Federal Highway Administration and the Federal Transit Administration, in consultation with the U.S. Environmental Protection Agency, CARB and the regional Air Quality Management Districts, determined that the 2016 RTP/SCS was in conformance with the applicable State Implementation Plan (SIP) prepared in accordance with the Clean Air Act to establish control measures necessary to achieve attainment of certain National Ambient Air Quality Standards (NAAQS) in the SCAG region. Accordingly, all federal and state expert agencies with regulatory jurisdiction over air resources in the SCAG region have determined that, if implemented, the 2016 RTP/SCS, which assumes development of the Project with urban uses commensurate with the *Centennial Specific Plan*, would achieve targeted per capita GHG emission reductions from passenger vehicles and will not impede or conflict with regional efforts to reduce criteria air pollutants to acceptable levels.

As discussed in Comment D.4-2, SCAQMD has reviewed the Draft EIR and determined that the Project "supports the goals of the 2016 AQMP and will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the Basin." As discussed in Comment D.1-1, the Antelope Valley Air Quality Management District has reviewed, and has no comments on, the Draft EIR.

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

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Barnes MC, Gunnell D, Davies R, et al., 2015 (December), *Understanding vulnerability to self-harm in times of economic hardship and austerity: a qualitative study*. BMJ Open 2016;6:e010131. doi:10.1136/bmjopen-2015-010131.

2065 *Id.,* pp. 5.11-22 to -29
2066 *Id.,* pp. 5.11-40 to -78
2067 *Id.,* pp. 5.8-4 to -13
2068 *Id.,* pp. 5.8-73 to -74

Berger, L., Collins, J., Font, S., Gjertson, L., Slack, K., Smeeding, T., 2015 (August), *Home Foreclosure and Child Protective Services Involvement*, Pediatrics, www.pediatrics.org/cgi/doi/10.1542/peds.2014-2832.

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Gamboa, J., Gallegos, H. 2017 (July 7). *Opinion: We must build more affordable homes in California.* East Bay Times. Walnut Creek, CA: http://www.eastbaytimes.com/2017/07/07/opinion-we-must-build-more-affordable-homes-in-california/.

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Labonté, R., Cobbett, E., Orsini, M., Spitzer, D., Schrecker, T., Ruckert, A., 2015, *Globalization and the health of Canadians: 'Having a job is the most important thing'*, DOI 10.1186/s12992-015-0104-1.

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Response to Comment F.8-190:

This comment correctly notes that there are many different types of air pollution, of which ozone, particulate matter (PM) and toxic air contaminants (TACs) are of particular concern in Southern California's urban areas, as discussed in Sections 5.11.1 and 5.11.4 of the EIR's Air Resources chapter.[2069] This comment's description of ozone and particulate matter, including fugitive dust, and their sources and associated health risks (as discussed in the Commenter's cited documents: Laurent 2016; ALA 2016; VCAQR 2003; BAAQMB 2016; Bailey; Betancourt 2012) is also generally accurate and is consistent with the information disclosed in Section 5.11.1 of the Air Resources chapter.

As discussed in response to Comment F.8-189, per the Supreme Court's holding in *CBIA v. BAAQMD*, the EIR is not required to analyze the potential impacts of existing TAC emissions from regional shipping activities on the Project or its residents/visitors. Moreover, the largest regional and intra- and inter-state shipping route in the vicinity of the Project is Interstate 5, which is located a mile from the Project boundary. This distance is well beyond the outer boundary of every TAC buffer area recommend by CARB to protect sensitive receptors from existing sources of emissions. Please see response to Comment F.8-189 regarding the Draft EIR's analysis of the potential impact of TACs generated by existing vehicle traffic on SR-138.

As with existing TAC sources, per the Supreme Court's holding in *CBIA v. BAAQMD*, the EIR is not required to analyze the potential impact of particulate matter generated from forest fires on Project residents or visitors. Nevertheless, as discussed in Chapter 5.2, H*ydrology and Flood*, the Project will provide up to four new fire stations staffed by a minimum four-person engine company. In Village 1, one fire station is proposed east of the National Cement Plant Road. The second fire station is proposed in Village 4, and the third fire station is proposed in Village 7, with the location of a potential fourth station to be determined. These new fire stations are projected to provide an average five-minute response time for the first arriving unit for fire and eight minutes for the advanced life support (paramedic) unit on the site at Project buildout. This is consistent with the County of Los Angeles Fire Department's (LACFD's) goals for response times in urban areas. Ultimately, the LACFD would approve the final station site locations, and the Applicant would construct and equip the fire stations (MM 16-3). The LACFD has indicated that the proposed fire stations on the site would provide adequate fire service to the Project. Moreover, per MM 3-7, the Project must prepare an Emergency Response Plan for LACFD approval and, per MM 3-8, the Project must prepare a Traffic Control Plan in accordance with the California Manual on Uniform Traffic Control Devices for Caltrans approval. Consequently, access to, from, and in the vicinity of the Project site will be substantially improved from the existing condition.

With respect to fire flows, the Draft EIR explains that the Project would construct a Fire Code compliant water system to support proposed land uses and provide adequate fire flows and pressure to support any fire-suppression activity in the event of wildland or structural fires (refer to Section 5.18, Water Resources, for further discussion of the water system; see also

[2069] DRP 2017, pp. 5.11-1 to -10, -22 to -29

the Water Service Plan described in Section 3.5 of the proposed Specific Plan.[2070] The proposed water system includes water mains, water tanks, pump stations (where necessary), and fire hydrants to ensure sufficient fire flows and water pressure to meet County of Los Angeles Department of Public Works' and LACFD's fire-suppression standards for improved property and development. These standard requirements must be met prior to the approval of building permits; therefore, the Project would implement a water system that would meet all County requirements in support of fire-suppression activities so that less than significant water-related fire hazards would occur. Under Project conditions, fire flows at the Project site will be substantially improved as compared to existing conditions.

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

Finally, as discussed in Section 5.3, *Hazards and Fire Safety*, government agencies in California have adopted fire prevention and response strategies to address wildfire risks, including wildfire risks associated with climate change. For example, the California Building Standards Commission adopted revised statewide building standards in 2010 to require residential fire sprinklers in all new one and two family and town-home constructions. In 2012 the State Legislature required city and county general plans to address the risk of fire in state responsibility areas and very high fire hazard severity zones, taking into account detailed considerations including the Office of Planning and Research's "Fire Hazard Planning" document.[2071]

This response cites Laurent et al. (2016) to support its claim that certain air pollutants, including PM, have been linked to adverse health effects, including birth defects.[2072] The referenced document is a study that demonstrates an association between low birth weight and mobile PM emissions in California. The conclusions of the referenced document are consistent with the determinations of the Draft EIR which discloses on page 5.11-9 and

[2070] Final EIR Appendix 4.0-A.Rev

[2071] Stats. 2012, Ch. 311

[2072] Laurent, O. et al., *Low birth weight and air pollution in California: which sources and components drive the risk?*, Environment International 92-93:471-477 (2016).

5.11-10 that TAC emissions are known or suspected to cause cancer and other serious health effects.

Response to Comment F.8-191:

This comment promotes the environmental benefits associated with infill development, citing planning guidelines published by the Bay Area Air Quality Management District. The Project site is not located within the jurisdiction of that agency. Rather, it is located within the jurisdictional boundaries of the County, the South Coast Air Quality Management District (SCAQMD), the Antelope Valley Air Quality, Management District (AVAQMD), and the Southern California Association of Governments (SCAG), as discussed in Section 5.11.2 of the Air Resources chapter.

The Project has been situated and designed to promote regional "smart growth" planning principles established by SCAG's 2016 RTP/SCS and the County's AVAP for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria pollutant and greenhouse gas (GHG) emissions and to promote public health. Indeed, both the AVAP and the 2016 RTP/SCS designate the Project site for urban growth commensurate with the *Centennial Specific Plan*.

Please see response to Comment F.8-20 for a detailed discussion of the Project's consistency with the 2016 RTP/SCS and the AVAP growth projections. As discussed in that response, all federal and state expert agencies with regulatory jurisdiction over air resources in the SCAG region have determined that, if implemented, the 2016 RTP/SCS would achieve targeted per capita GHG emission reductions from passenger vehicles and will not impede or conflict with regional efforts to reduce criteria air pollutants to acceptable levels.

As further discussed in response to Comment F.8-20, SCAG has carefully considered land use policies that would promote aggressive regional infill development, but ultimately determined that the balanced land use plan described in the 2016 RTP/SCS better protects low income populations from the adverse effects associated with aggressive infill development, most notably gentrification while also achieving the region's GHG emissions reduction targets. SCAG's findings regarding the adverse environmental, social and economic impacts of aggressive infill development are consistent with recent research on the subject. For example, the Urban Displacement Project, a research initiative of UC Berkeley and UCLA, developed a neighborhood database for the Los Angeles County region that compiles demographic, socio-economic, and housing data in both transit and non-transit neighborhoods, which was analyzed to understand local gentrification effects.[2073] It's analysis of regional changes from 2000 to 2014, found that "relative to non-transit areas, transit neighborhoods are more associated with higher increases in whites, college educated, higher income households and greater increases in the cost of rent. Conversely, transit neighborhoods are associated with greater losses in disadvantaged populations including

[2073] Urban Displacement Project (UDP). 2017. *Mapping Neighborhood Change In Los Angeles County.* University of California, Berkeley; University of California, Los Angeles. Los Angeles, CA: http://www.urbandisplacement.org/map/la.

individuals with less than a high school diploma and lower income households".[2074] The Urban Displacement Project also found that the biggest displacement impacts occur around downtown Los Angeles infill areas "where transit-oriented development interacts with other interventions aiming to revitalize the urban form".[2075] In any case, statewide GHG emissions from passenger vehicles are on the rise, despite regional land use policies that focus most new development in infill locations.[2076]

While infill development is an important component of regional land use policy designed to achieve mandated emissions reductions, the environmental impact reports for the 2012 and 2016 RTP/SCS documents demonstrate that too much infill development risks significant adverse environmental and social impacts within the communities targeted for such development, as discussed further in response to Comment F.8-20.

In support of its claim that the County should perform a life cycle assessment (LCA) of the entire project to "inspect the totality of the resultant air pollution, from the manufacturing of materials to their transport to the site, and beyond," the Commenter cites a 2013 report prepared by the Massachusetts Institute of Technology's Concrete Sustainability Hub (CSH Report) that evaluates LCAs of residential buildings published between 2008 and 2012 in order "to review different approaches to LCA in an effort to give a sense of the state of the current research in the area, as well as to identify gaps or inconsistencies that could be refined in order to provide accurate results".[2077] Since the CSH Report only concerns LCAs of residential buildings, it is of little relevance with respect to the Project-wide LCA recommended by the Commenter. Moreover, the CSH Report determined the value of an LCA depends on "understand[ing] both the embodied and use impacts of buildings constructed with energy efficiency measures in various combinations".[2078] However, the CSH Report found that "there is no common methodology to adequately address a wide range of building forms and lifetimes in various geographic regions," that "there was an overall absence of local primary data," and that "[t]his lack of data illuminates the potential for considerable uncertainty within quantitative results".[2079] Thus, the CSH Report demonstrates that there is no available methodology for performing an accurate quantitative LCA for a residential building, much less an accurate LCA for an entire master-planned community.

The EIR is required to evaluate the Project's environmental impacts only to the extent it is reasonably feasible to do so and it is not required to engage in speculation, particularly when there is no standard, accepted methodology to assess a significant impact.[2080,2081] The CSH Report cited by the Commenter demonstrates that there is no standard, accepted methodology for performing an accurate quantitative LCA for an entire master-planned community and such a study would, at best, require the Lead Agency to engage in uncertain

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2074 *Ibid.*
2075 *Ibid.*
2076 Thornberg, C., Chong, H., Fowler, A. 2017. *2017 California Green Innovation Index.* Next 10. San Francisco, CA: Next 10.
2077 Ghattas, R. et al. 2013. *Life Cycle Assessment for Residential Buildings: a literature review and gap analysis* (p. 5), Concrete Sustainability Hub, MIT.
2078 *Id.,* p. 12
2079 *Ibid.*
2080 CEQA Guidelines §§ 15151, 15144-15145
2081 *Berkeley Keep Jets Over the Bay Comm. v. Board of Port Comm'rs* (2001) 91 Cal.App.4th 1344, 1370

speculation. Moreover, the California Supreme Court has expressly found that CEQA does not require EIRs to include a life cycle analysis of a project's potential environmental effects [*Save the Plastic Coalition v. City of Manhattan Beach* (2011) 52 Cal.4th 155, 173 (CEQA does not require an agency "to conduct an exhaustive analysis of all conceivable impacts a project may have in areas outside its geographical boundaries")]. Here, the EIR evaluates the potential environmental effects of the whole Project, but CEQA does not require the EIR to also analyze the environmental effects of manufacturing a light switch in Maine that may one day be installed in a California home. As stated by the Supreme Court, "common sense … is an important consideration at levels of CEQA review" and "the product 'life cycle' must be kept in proper perspective and not be allowed to swamp the evaluation of actual impacts attributable to the project at hand".[2082]

In support of its claim that the County should perform an LCA of the entire project, the Commenter also cites a May 2016 document prepared by the Bay Area Air Quality Management District (BAAQMD) titled *Planning Healthy Places, A Guidebook for Addressing Local Sources of Air Pollutants in Community Planning*. This BAAQMD document does not, however, recommend the inclusion of an LCA in CEQA documents, nor does it discuss LCAs at all.

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

Urban Displacement Project (UDP). 2017. *Mapping Neighborhood Change In Los Angeles County.* University of California, Berkeley; University of California, Los Angeles. Los Angeles, CA: http://www.urbandisplacement.org/map/la.

Thornberg, C., Chong, H., Fowler, A. 2017. *2017 California Green Innovation Index.* Next 10. San Francisco, CA: Next 10. file:///C:/Users/bbbrownlow/Documents/Centennial%20RTC/2017-CA-Green-Innovation-Index-Final.pdf.

Response to Comment F.8-192:

This comment's statement that the Project would affect certain air basins that have been designated nonattainment for certain NAAQS is correct, as disclosed in section 5.11.2 of the Air Resources chapter. This comment also correctly states that the South Coast air basin is currently designated as extreme nonattainment for the 2008 8-hour ozone NAAQS, moderate nonattainment for the 2012 PM 2.5 NAAQS, serious nonattainment for the 2006 PM 2.5 NAAQS, and moderate nonattainment for the 1997 PM 2.5 NAAQS, as discussed in EIR pages 5.11-15 and 5.11-25. This comment's statement that the San Joaquin Valley air basin is currently designated as extreme nonattainment for 2008 8-hour ozone NAAQS, moderate nonattainment for 2012 PM 2.5 NAAQS, and serious non-attainment for 2006 and 1997 PM 2.5 NAAQS is also accurate. This comment also correctly states that the Mojave Desert air basin is currently designated as severe nonattainment for 2008 8-hour ozone NAAQS, as discussed on Draft EIR page 5.11-14. This comment's assertion that the Mojave

[2082] *Save the Plastic Coalition v. City of Manhattan Beach* at p. 175

Desert air basin is currently designated as moderate nonattainment for the 1997 PM 10 NAAQS is inaccurate. Rather, the Mojave Desert air basin is currently designated as moderate nonattainment for the 1987 PM 10 NAAQS and only within San Bernardino County (the Project site is located in Los Angeles County). The USEPA has designated the portion of the Mojave Desert air basins within the Antelope Valley Air Quality Management District as "unclassifiable," as discussed on Draft EIR page 5.11-23.

As explained in Section 5.11.2 of the Air Resources chapter, the Project site lies in two different air districts and two different air basins.[2083] The northern 91 percent of the site lies within the boundary of the Antelope Valley Air Quality Management District (AVAQMD), while the remaining 9 percent lies within the boundary of the County Coast Air Quality Management District (SCAQMD).[2084] The portion of the site under the jurisdiction of the AVAQMD lies within the Mojave Desert Air Basin (MDAB).[2085] The portion of the site under the jurisdiction of the SCAQMD lies within the South Coast air basin.[2086]

As explained in Section 5.11.2, the Antelope Valley has not yet demonstrated attainment status for ozone (O_3), largely due to the transport of pollutants from the Los Angeles Basin and San Joaquin Valley. In 2008, the AVAQMD prepared the *Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Non-attainment Area)* to replace or update all previously submitted federal ozone plans for the Antelope Valley. The plan (1) demonstrates that the AVAQMD will meet the primary required federal O_3 planning milestones and will attain the 1997 8-hour O_3 NAAQS by June 2021; (2) presents the progress the AVAQMD will make towards meeting all required O_3 planning milestones; and (3) discusses the 2008 0.075 part per million (ppm) 8-hour O_3 NAAQS, preparatory to an expected nonattainment designation for the new NAAQS.[2087] The AVAQMD is not proposing to adopt any additional control measures for direct O_3 precursor reduction purposes. However, the AVAQMD is committed to having all applicable Federal Reasonably Available Control Technology (RACT) rules as specified in the *Federal 8-Hour Ozone Attainment Plan*, and is currently performing analyses on the feasibility of adopting additional rules under the State of California "all feasible measures" mandate, which requires air districts to adopt rules that achieve the maximum degree of O_3 precursor emissions reduction, taking into account technology considerations and economic impacts. In addition, the AVAQMD will experience additional future emission reductions from existing and proposed federal and State control measures that affect mobile and area sources. In June 2008, the CARB approved a SIP revision for the Western Mojave Desert Ozone Nonattainment Area; the SIP revision includes the *AVAQMD Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Non-attainment Area)*. The SIP revision was submitted to the USEPA in July 2008. As of the preparation of this EIR, the SIP revision has not been approved.

2083 DRP 2017, pp. 5.11-11 to -17
2084 *Id.,* p. 5.11-13
2085 *Id.,* p. 5.11-14
2086 *Id.,* p. 5.11-15
2087 On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

The AVAQMD adopted the *List and Implementation Schedule for District Measures to Reduce PM Pursuant to Health & Safety Code §39614(d)* on August 16, 2005. The list was prepared in response to the code which requires CARB, in consultation with local air pollution management districts, to develop and adopt a list of the most readily available, feasible, and cost-effective control measures that could be employed by CARB and the air districts to reduce PM10 and PM2.5.[2088]

With respect to the South Coast air basin (SoCAB), Section 5.11.2 of the Air Resources chapter explains that, on November 28, 2007, CARB submitted a State Implementation Plan (SIP) revision to the USEPA for O_3, PM2.5 (1997 Standard), CO, and NO_2 in the SoCAB. This revision is identified as the "2007 South Coast SIP". The 2007 South Coast SIP demonstrates attainment of the federal PM2.5 standard in the SoCAB by 2014 and attainment of the federal 8-hour O_3 standard by 2023. This SIP also includes a request to reclassify the O_3 attainment designation from "severe" to "extreme". The USEPA approved the redesignation effective June 4, 2010. The "extreme" designation requires the attainment of the 8-hour O_3 standard in the SoCAB by June 2024. CARB approved PM2.5 SIP revisions in April 2011 and the O_3 SIP revisions in July 2011. The USEPA approved the PM2.5 SIP on September 25, 2013 and has approved 47 of the 62 1997 8-hour O_3 SIP requirements. On November 30, 2014, the USEPA proposed a finding that the SoCAB has attained the 1997 PM2.5 standards. The comment period closed on January 22, 2015; no subsequent action has been taken.[2089]

On September 30, 2015, the USEPA proposed to approve elements of the South Coast 2012 PM2.5 Plan and 2015 Supplement, which addresses Clean Air Act requirements for the 2006 PM2.5 NAAQS, and proposed to reclassify the area as a 'serious' nonattainment area for the 2006 PM2.5 standard. The reclassification is based on the determination that the area cannot practicably attain the 2006 PM2.5 NAAQS by the moderate area attainment date (December 31, 2015). On December 22, 2015, the EPA reclassified the South Coast area as a "Serious" nonattainment area for the 2006 PM2.5 standard. The final reclassification requires the State to submit a "serious area" plan that provides for attainment of the 2006 PM2.5 NAAQS as expeditiously as practicable and no later than December 31, 2019.[2090]

On December 7, 2012, the SCAQMD adopted the 2012 AQMP, which is a regional and multi-agency effort (SCAQMD, CARB, SCAG, and USEPA). The 2012 AQMP incorporates the latest scientific and technical information and planning assumptions, including SCAG's 2012 RTP/SCS; updated emission inventory methods for various source categories; and SCAG's latest growth forecasts. The primary purposes of the 2012 AQMP are to demonstrate attainment of the federal 24-hour PM2.5 standard by 2014 and to update the USEPA-approved 8-hour Ozone Control Plan. On December 20, 2012, the 2012 AQMP was submitted to CARB and the USEPA for concurrent review and approval for inclusion in the SIP (SCAQMD 2013). The 2012 AQMP was approved by the CARB on January 25, 2013.[2091]

2088 DRP 2017, p. 5.11-15
2089 *Id.,* p. 5.11-15
2090 *Id.,* pp. 5.11-15 and -16
2091 *Id.,* p. 5.11-16

On March 3, 2017, the SCAQMD Governing Board adopted the final 2016 AQMD.[2092] The 2016 AQMP describes integrated strategies and measures to meet the following NAAQS:

1. 8-hour O_3 (75 parts per billion [ppb]) by 2031[2093]
2. Annual PM2.5 (12 micrograms per cubic meter [$\mu g/m^3$]) by 2025
3. 8-hour O_3 (80 ppb) by 2023
4. 1-hour O_3 (120 ppb) by 2022
5. 24-hour PM2.5 (35 $\mu g/m^3$) by 2019

As discussed in Comment D.4-2, SCAQMD has reviewed the Draft EIR and determined that the Project "supports the goals of the 2016 AQMP and will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the Basin". As discussed in Comment D.1-1, the Antelope Valley Air Quality Management District has reviewed, and has no comments on, the Draft EIR.

With regard to this comment's inaccurate claim that the EIR fails to adequately address Project emissions than may affect the San Joaquin, South Coast and Mojave Desert Air Basins, or conflict with the State Implementation Plan, please see responses to Comments F.8-193, F.8-194, and F.8-195.

Response to Comment F.8-192A:

This comment is a citation to a website maintained by the U.S. Environmental Protection Agency (EPA) that provides state information for designated nonattainment areas for criteria pollutants. The cited website supports the Commenter's assertion that the U.S. EPA currently designates the South Coast air basin as extreme nonattainment for the 2008 8-hour ozone standard, moderate nonattainment for the 2012 PM 2.5 standard, serious nonattainment for the 2006 PM 2.5 standard, and moderate nonattainment for the 1997 PM 2.5 standard.

Response to Comment F.8-192B:

This comment is a citation to a website maintained by the U.S. Environmental Protection Agency (EPA) that provides state information for designated nonattainment areas for criteria pollutants. The cited website supports the Commenter's assertion that the U.S. EPA currently designates the San Joaquin Valley air basin as extreme nonattainment for 2008 8-hour ozone standard, moderate nonattainment for 2012 PM 2.5 standard, and serious non-attainment for 2006 and 1997 PM 2.5 standards.

2092 *Ibid.*

2093 On October 1, 2015, the USEPA lowered the 8-hour O_3 standard to 0.070 ppm (70 ppb). The SIP (or AQMP) for the 70 ppb standard will be due 4 years after the attainment/non-attainment designations are issued by the USEPA, which is expected next year in 2017. Thus, meeting the 70 ppb standard will be addressed in a 2021 AQMP.

Response to Comment F.8-192C:

This comment is a citation to a website maintained by the U.S. Environmental Protection Agency (EPA) that provides state information for designated nonattainment areas for criteria pollutants. The cited website supports the Commenter's assertion that the U.S. EPA currently designates the Mojave Desert air basin as severe nonattainment for 2008 8-hour ozone standard. The cited website does not, however, support this comment's assertion that the U.S. EPA currently designates the Mojave Desert air basin as moderate nonattainment for the 1997 PM 10 standard. Rather, it shows the Mojave Desert air basin as moderate nonattainment for the 1987 PM 10 standard and only in San Bernardino County, California. The Project site, however, is located in Los Angeles County, California.

Response to Comment F.8-193:

The Commenter's opinion that the Draft EIR fails to adequately analyze the Project's air quality impacts because of the purported difficulty of determining whether the Project, in combination with other named projects (i.e., Grapevine, Newhall Ranch, Tejon Mountain Village) have the potential to interfere with applicable Air Quality Management Plans and/or the State Implementation Plan (SIP), is noted. This comment is not supported by the facts.

As discussed in Section 5.8.2 of the Land Use chapter,[2094] Section 5.8.6 of the same chapter,[2095] and in the SCAG 2016 RTP/SCS and accompanying EIR, the Project site has been reviewed and designated for new urbanized growth as part of the RTP/SCS's comprehensive regional planning process that takes into consideration compliance with criteria pollutant ambient air quality standards, GHG emission reduction mandates, as well as all other environmental impact factors. The SCAG 2016 RTP/SCS also includes the Newhall Ranch project in its growth projections and balanced land use plan.[2096] Likewise, the Kern County Council of Governments' (KernCOG) *2014-2040 Regional Transportation/Sustainable Communities Strategy* assumes all urban development proposed by Tejon Mountain Ranch and Grapevine Projects and includes both projects in its growth projections (KernCOG 2014 RTP/SCS).[2097] Indeed, the KernCOG 2014 RTP/SCS explains that KernCOG and SCAG meet regularly to coordinate land and use transportation planning strategies and to share data regarding large development projects in their respective jurisdictions, expressly citing the Centennial project as an example.[2098] Moreover, the KernCOG 2014 RTP/SCS expressly describes the *Tejon Ranch Conservation and Land Use Agreement*, including its identification of the Tejon Mountain Village and Grapevine project sites as future master-planned communities, as "a major regional sustainability success story".[2099]

2094 DRP 2017, pp. 5.8-6 and -7
2095 *Id.,* pp. 5.8-73 and -74
2096 SCAG 2012, p. 145; SCAG 2015b, p. 10, 11
2097 Kern Council of Governments (KernCOG). 2014a (June). *2014 Regional Transportation Plan/Sustainable Communities Strategy. Kern Council of Governments* (p. 4-25, -27). Bakersfield, CA: http://www.kerncog.org/wp-content/uploads/2017/08/2014_RTP.pdf.
2098 *Id.,* p. 5-125
2099 *Id.,* p. E-38

On July 23, 2015, CARB adopted Resolution 15-38 certifying that implementation of the KernCOG 2014 RTP/SCS would achieve the per capita GHG reduction targets for the KernCOG region, in accordance with SB 375. The following year, CARB also certified that implementation of the SCAG 2016 RTP/SCS would achieve the SCAG region's GHG reduction targets, as discussed in response to Comment F.8-20. The Federal Highway Administration and the Federal Transit Administration, in consultation with the U.S. Environmental Protection Agency, CARB and the regional Air Quality Management Districts, have determined that the SCAG 2016 RTP/SCS and the KernCOG 2014 RTP/SCS are both in conformance with the State Implementation Plan (SIP) and applicable Air Quality Management Plans prepared in accordance with the Clean Air Act to establish control measures necessary to achieve attainment of National Ambient Air Quality Standards (NAAQS) in the SCAG and KernCOG regions.[2100,2101] Accordingly, all federal and state expert agencies with regulatory jurisdiction over air resources in the SCAG and KernCOG regions have determined that, if implemented, the SCAG 2016 RTP/SCS and the KernCOG 2014 RTP/SCS would achieve targeted per capita GHG emission reductions from passenger vehicles and will not impede or conflict with federal, state and regional efforts to reduce criteria air pollutants to acceptable levels in the South Coast, Mojave Desert, and San Joaquin Valley air basins.

In analyzing the Project's potential effects on natural resources, the County is entitled to rely on the determinations of, and relevant information and data prepared by, expert agencies with jurisdiction over such resources (*see, e.g.,* CEQA Guidelines §§ 15086(a), 15384(b); *Berkeley Keep Jets over the Bay Committee v. Board of Port Com'rs* (2001) 91 Cal.App.4th 1344, 1370 (CEQA requirement that EIR include "good faith reasoned analysis" obligates lead agency to collect and consider data prepared by regulatory agencies having jurisdiction in the matter); *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928 (Lead agency may rely on "expert opinion if supported by facts, even if not based on specific observations as to the [project] under review")). Thus, the County is entitled to rely on federal, state and local air resource agency determinations that implementation of the SCAG 2016 RTP/SCS and the KernCOG 2014 RTP/SCS (which collectively assume development of the Centennial, Newhall Ranch, Grapevine and Tejon Mountain Ranch project sites with urban uses commensurate with each project's specific plan) would not impede or conflict with applicable air quality management plans.

Moreover, as discussed in Comment D.4-2, SCAQMD has reviewed the Draft EIR and determined that the Project "supports the goals of the 2016 AQMP and will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the Basin." As discussed in Comment D.1-1, the Antelope Valley Air Quality Management District has reviewed, and has no comments on the Draft EIR.

2100 UDOT 2012, 2013, 2016, 2017

2101 Kern Council of Governments (KernCOG). 2014b (June). *Conformity Analysis For the 2015 Federal Transportation Improvement Program and 2014 Regional Transportation Plan*. Bakersfield, CA: http://www.kerncog.org/wp-content/uploads/2009/10/conformity_2014_FTIP-RTP.pdf.

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

Kern Council of Governments (KernCOG). 2014a (June). *2014 Regional Transportation Plan/Sustainable Communities Strategy. Kern Council of Governments*. Bakersfield, CA: http://www.kerncog.org/wp-content/uploads/2017/08/2014_RTP.pdf.

Kern Council of Governments (KernCOG). 2014b (June). *Conformity Analysis For the 2015 Federal Transportation Improvement Program and 2014 Regional Transportation Plan*. Bakersfield, CA: http://www.kerncog.org/wp-content/uploads/2009/10/conformity_2014_FTIP-RTP.pdf.

Kern Council of Governments (KernCOG). 2014c (June). *2014 Regional Transportation Plan for Kern County Program Environmental Impact Report (SCH No. 2013012067).* Kern Council of Governments. Bakersfield, CA: http://www.kerncog.org/wp-content/uploads/2017/08/2014_RTP_EIR_Final.pdf.

Response to Comment F.8-194:

The comment's observation that the EIR must include substantial evidence that the Project would not conflict with applicable air quality management plans (AQMPs) is noted. There is substantial evidence in the administrative record that cumulative development within the South Coast, Mojave Desert, and San Joaquin Valley Air Basins, combined with the Project, conform to the growth projections, assumptions and mitigations underlying or incorporated into the AQMPs and RTP/SCS's applicable to those basins.

As discussed in more detail in responses to Comments F.8-20 and F.8-193, the SCAG 2016 RTP/SCS and the KernCOG 2014 RTP/SCS, and their accompanying EIRs, take into account cumulative regional growth projections, including the Centennial, Newhall Ranch, Tejon Mountain Village and Grapevine projects, as required by CEQA and SB 375. Both plans have been reviewed by all federal, state and regional expert agencies with jurisdiction over the air basins within the planning areas of the SCAG 2016 RTP/SCS and KernCOG 2014 RTP/SCS and both plans have been determined to be in conformity with the State Implementation Plan (which incorporates all applicable AQMPs) to achieve and maintain air quality standards. This is explained in detail in the EIR, with analysis specific to the applicable AQMPs and RTP/SCS documents.[2102] The County is entitled to rely on these determinations, as discussed in response to Comment F.8-193. Thus, contrary to the Commenter's stated opinion (which has no evidentiary support), the Draft EIR's determination that the Project will not conflict with the SCAG RTP/SCS and applicable AQMPs is not based on conclusory statements.

With regards to this comment's characterization of the Project as "leapfrog" development, please see response to Comment F.8-20. With regards to this comment's reference to the "Antelope Valley Air Basin," no such air basin exists. However, the Antelope Valley Air Quality

[2102] DRP 2017, p. 5.11-13 to -17, -74, -75; 7-3 to 7-9, -20

Management District is located within a portion of the Mojave Desert Air Basin, as explained in the Draft EIR at page 5.11-14.

Response to Comment F.8-195:

Contrary to this comment's inaccurate claim, the EIR does not segment its air quality analysis to avoid analyzing the whole of the Project, nor does it minimize Project impacts by not accounting for Project emissions in all affected air basins. As explained in Section 5.11, Air Resources, the Project's total construction and operational emissions were calculated by using the California Emissions Estimator Model (CalEEMod) Version 2016.3.1 and assessed against CEQA significance thresholds and air quality management plans (AQMPs) adopted by the Antelope Valley Air Quality Management District (AVAQMD) and the South Coast Air Quality Management District (SCAQMD), the two air districts with jurisdiction over the Project.[2103]

As explained in Section 5.11.3 of the Air Resources chapter, the Project's CalEEMod includes construction and operational inputs for all Project land uses and acreages.[2104] Construction input data also includes but is not limited to the start and finish dates of construction phases; inventories of all construction equipment to be used during each phase of construction; the volumes of structures to be demolished; the volumes of materials to be imported to and exported from the Project site; the total areas to be paved and to be painted.[2105] Construction emissions output data are provided for all off-road equipment, all on-road vehicles, all fugitive dust from grading, and all VOCs from asphalt off-gas and architectural coatings.[2106] Operational inputs also include the year of analysis and vehicle trip generation rates.[2107] Output operational emissions data categories included mobile sources, area sources (e.g., landscape maintenance, consumer products, architectural coatings), and energy sources (e.g., emissions for natural gas consumption).[2108] Thus, the EIR accounts for all direct and indirect Project emissions and analyzes the whole of the Project's potential air quality impacts.

This comment's assertion that the total emissions from the Project must be analyzed against the thresholds and air quality management plans for the South Coast Air Basin (SoCAB) and "Antelope Valley air basin" is noted. As an initial matter, with respect to this comment's reference to the "Antelope Valley air basin," no such air basin exists. The EIR assesses the significance of the Project's total emissions using the thresholds of significance recommended by AVAQMD and SCAQMD, the two air districts with jurisdiction over the Project site, which straddles the SoCAB and the Mojave Desert Air Basin (MDAB), as described in EIR Section 5.11.7.[2109] The EIR also considers whether the Project would

2103 *Id.,* p. 5.11-18 to -22, -36 to -83
2104 *Id.,* Appendix 5.11-A
2105 *Ibid.*
2106 *Ibid.*
2107 *Ibid.*
2108 *Ibid.*
2109 *Id.,* pp. 5.11-40 to -74

conflict or obstruct implementation of the applicable air quality plans adopted by AVAQMD and SCAQMD, and determined that this impact would be less than significant.[2110]

This comment's assertion that the EIR must prepare modeling to analyze the potential for drift and project emissions from mobile sources as they would be affecting the MDAB and the San Joaquin Valley Air Basin (SJVAB) is noted. In Kern County, the air district with jurisdiction over the SJVAB is the San Joaquin Valley Air Pollution Control District (SJVAPCD), while the Eastern Kern Air Pollution Control District (EKAPCD) has jurisdiction over the Kern County portion of the MDAB. This comment's reference to "drift" emissions is assumed to refer to the potential for Project emissions to be transported by wind from the air basin in which they are emitted to other air basins. However, neither the SCAQMD, AVAQMD, SJVAPCD or EKAPCD require a project-level analysis of pollutant transport between air basins as part of the California Environmental Quality Act process, and any such analysis would be speculative as to where the air pollutants emitted by any single project would travel by wind. Such analysis is instead performed at the air-district-level for inclusion in applicable AQMPs.[2111,2112]

Pollution transport studies prepared by CARB demonstrate that, while there is potential for pollutants to be transported by wind from the SoCAB to the MDAB, neither of those basins transport pollutants by wind to the SJVAB.[2113] Thus, the only emissions that the Project is expected to contribute to the SJVAB would be generated by Project vehicle trips occurring within the SJVAB. Total Project-related vehicle trips are described in Section 5.10, Traffic and Circulation, and in the TIS. The Project will generate trips with destinations in Los Angeles, Ventura, and Kern Counties, as shown on Draft EIR Exhibit 5.10-7, which areas overlap with portions of the SoCAB, the South Coast Air Basin (SCCAB), the SJVAB, and the MDAB, although the vast majority of such trips will occur in the Los Angeles County portions of the SoCAB and MDAB. Average daily trip (ADT) generation rates from the TIS, were entered into the appropriate land use categories in CalEEMod to determine total vehicle trips, vehicle miles traveled, and associated emissions by land use unit type. Thus, the EIR does account for the Project's total emissions, including those generated by Project vehicle trips with destinations in air basins beyond those in which the Project site is located.

All vehicle trips associated with the Project are incorporated into the KernCOG 2014 RTP/SCS and its accompanying EIR, and related mobile emissions are included in the emissions budgets assumed by the SJVAPCD's AQMPs, including its *2016 Ozone Plan for 2008-Hour Ozone Standard* and *2015 Plan for the 1997 PM2.5 Standard*, and the EKAPCD's

[2110] *Id.,* pp. 5.11-74 and -75

[2111] California Air Resources Board (CARB). 2001. *Assessment of the Impacts of Transported Pollutants on Ozone Concentrations in California*. Sacramento, CA: https://www.arb.ca.gov/regact/trans01/isor.pdf.

[2112] California Health & Safety Code §39610

[2113] 14 California Code of Regulations (CCR) §70500

2017 Ozone Attainment Plan for 2008 Federal 75 ppb 8-Hour Ozone Standard.[2114,2115,2116,2117] Moreover, as discussed in response to Comment F.8-193, all state, federal and regional regulatory agencies with jurisdiction over air resources have determined that the KernCOG 2014 RTP/SCS is in conformance with the State Implementation Plan (SIP) and applicable AQMPs. Accordingly, Project vehicular emissions would not conflict with applicable AQMPs or delay timely attainment of air quality standards within the Kern County portions of the SJVAB and MDAB.

CARB has determined that pollution is not transported by wind from the MDAB to the SoCAB or SCCAB, but the SoCAB does transport emissions to the MDAB and SCCAB.[2118] As explained in 5.11.7, *Air Resources*, population associated with the Project was not included in the 2004 SCAG growth forecasts, upon which the AVAQMD *Federal 8-Hour Ozone Attainment Plan* was based. However, the 2008, 2012, and 2016 SCAG growth forecasts have accounted for the Project and, therefore, emissions associated with the Project will be accounted for in future AVAQMD AQMPs, which updates are required at least once every three years. Therefore, revised AVAQMD AQMP's, which would include the Project's population and emission forecasts are expected to be in place prior to the initial occupation of Project facilities.[2119]

In addition, all Project trips and their emissions were incorporated into the SCAG 2016 RTP/SCS and accompanying EIR, which applies to the SoCAB, the Los Angeles County portion of the MDAB and the Ventura County portions of the SCCAB, and were included in the motor vehicle emissions budgets assumed by the SCAQMD's 2016 AQMP, as well as the Ventura County Air Pollution Control District's (VCAPCD) 2016 AQMP.[2120,2121] Moreover, as discussed in response to Comment F.8-193, and all state, federal and regional regulatory agencies with jurisdiction over air resources have determined that the SCAG 2016 RTP/SCS is in conformance with the State Implementation Plan (SIP) and applicable AQMPs. Accordingly, Project vehicular emissions would not conflict with applicable AQMPs or impede timely attainment of air quality standards within the SoCAB, SCCAB and Los Angeles County portion of the MDAB.

2114 Kern Council of Governments (KernCOG). 2014c (June). *2014 Regional Transportation Plan for Kern County Program Environmental Impact Report (SCH No. 2013012067)* (p. 4.3-31)*.* Kern Council of Governments. Bakersfield, CA: http://www.kerncog.org/wp-content/uploads/2017/08/2014_RTP_EIR_Final.pdf.

2115 San Joaquin Valley Air Pollution Control District (SJVAPCD). 2016. *2016 Ozone Plan for 2008 8-Hour Ozone Standard* (p. B-31). Fresno, CA. SJVAPCD: http://www.valleyair.org/Air_Quality_Plans/Ozone-Plan-2016/Adopted-Plan.pdf.

2116 San Joaquin Valley Air Pollution Control District (SJVAPCD). 2015. *2015 Plan for the 1997 PM2.5 Standard* (pp. B-31, B-32). Fresno, CA. SJVAPCD: http://www.valleyair.org/Air_Quality_Plans/docs/PM25-2015/2015-PM2.5-Plan_Bookmarked.pdf.

2117 Eastern Kern Air Pollution Control District (EKAPCD). 2017. 2017 Ozone Attainment Plan For 2008 Federal 75 ppb 8-Hour Ozone Standard (p. 20). Bakersfield, CA: http://www.kernair.org/Documents/Announcements/Attainment/2017%20Ozone%20Plan_EKAPCD_Adopted_7-27-17.pdf.

2118 CARB 2001; 14 CCR §70500

2119 *Ibid.*

2120 South Coast Air Quality Management District (SCAQMD). 2016. Final 2016 Air Quality Management Plan (p. ES-6). Diamond Bar, CA: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15.

2121 Ventura County Air Pollution Control District (VCAPCD). 2016. Final 2016 Ventura County Air Quality Management Plan (p. 65). Ventura, CA: http://www.vcapcd.org/pubs/Planning/AQMP/2016/Final/Final-2016-Ventura-County-AQMP.pdf.

CEQA does not require speculation (e.g., creation of a novel new multi-project, multi-air-basin attainment model), but does allow lead agencies to rely on available analytical methodologies established by expert air quality agencies to assess air quality impacts. As discussed above, each affected air district, SCAG and KernCOG takes into account population, on- and off-road vehicle, industrial processes, and other sources of air pollutants into numerous documents which include air quality management plans and Regional Transportation Plan\Sustainable Community Strategy (RTP\SCS). Basin-wide air pollutant dispersion modeling for all existing and projected emission sources are conducted to determine their effect on air quality within the air basin, and account for potential transport to other air basins. The quantified effect of projects on the air quality of an air basin is accounted for in these macro level documents and not in project-level environmental assessments. Use of the plan conformity approach that is included in regional air quality attainment models to assess cumulative impacts from plans that include projected regional growth, including the project under consideration, has been determined to be compliant with CEQA. Accordingly, the EIR is not required to prepare a multi-project, multi-air-basin modeling to analyze the potential for inter-basin pollution transport from Project-related mobile sources that may affect various regional air basins, as this comment incorrectly claims.

Please also see response to Comment F.8-199.

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

California Air Resources Board (CARB). 2001. *Assessment of the Impacts of Transported Pollutants on Ozone Concentrations in California*. Sacramento, CA: https://www.arb.ca.gov/regact/trans01/isor.pdf.

Eastern Kern Air Pollution Control District (EKAPCD). 2017. 2017 Ozone Attainment Plan For 2008 Federal 75 ppb 8-Hour Ozone Standard. Bakersfield, CA: http://www.kernair.org/Documents/Announcements/Attainment/2017%20Ozone%20Plan_EKAPCD_Adopted_7-27-17.pdf.

San Joaquin Valley Air Pollution Control District (SJVAPCD). 2016. *2016 Ozone Plan for 2008 8-Hour Ozone Standard*. Fresno, CA. SJVAPCD: http://www.valleyair.org/Air_Quality_Plans/Ozone-Plan-2016/Adopted-Plan.pdf.

San Joaquin Valley Air Pollution Control District (SJVAPCD). 2015. *2015 Plan for the 1997 PM2.5 Standard*. Fresno, CA. SJVAPCD: http://www.valleyair.org/Air_Quality_Plans/docs/PM25-2015/2015-PM2.5-Plan_Bookmarked.pdf.

South Coast Air Quality Management District (SCAQMD). 2016. Final 2016 Air Quality Management Plan. Diamond Bar, CA: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15.

Ventura County Air Pollution Control District (VCAPCD). 2016. Final 2016 Ventura County Air Quality Management Plan. Ventura, CA: http://www.vcapcd.org/pubs/Planning/AQMP/2016/Final/Final-2016-Ventura-County-AQMP.pdf.

Response to Comment F.8-196:

The Lead Agency disagrees with this comment's assertion that the Draft EIR did not fully or adequately analyze or describe the potential health effects of the Project's air emissions. As described below, Section 5.11, *Air Resources*, comprehensively analyzed the potential adverse public health effects of the Project's construction and operational criteria and toxic air contaminant (TAC) emissions[2122] and incorporated detailed health risk assessments that consider all applicable Project sources of stationary and mobile operational TAC emissions.[2123]

Draft EIR Appendix 5.11-C, *Centennial Supplemental Air Quality Analysis*, evaluates in detail potential localized air quality impacts related to both criteria and toxic emissions generated by the Project, with a focus on how sensitive residential land uses would be affected by mobile emissions and stationary sources proximate to the Project site.

This study included the following components:

1. An evaluation of the potential health risks resulting from mobile emissions generated by increased traffic due to the project for new and existing residences located near California State Route 138;
2. An evaluation of ambient air quality impacts resulting from construction and comparison to the South Coast Air Quality Management District (SCAQMD) Localized Source Thresholds;
3. A review of a health risk assessment for the National Cement facility located north of the Project site; and
4. A review of consistency with air district plans and California Air Resources Board (CARB) land use guidelines.

Specifically, Appendix 5.11-C and the Draft EIR evaluates the potential adverse impacts of toxic air contaminants (TACs) and diesel particulate matter exposure generated by traffic traveling along SR-138 and the offsite National Cement factory.[2124]

To assess the health risks associated with SR-138 vehicle emissions, Appendix 5.11-C used the Centennial Specific Plan's land use plan to determine the Project-site location of all future sensitive receptors that would be located within 500 feet of SR-138, and evaluated cancer risk from diesel exhaust using a receptor grid with 40-meter spacing.[2125] The 500-foot buffer was selected on the basis of the California Air Resources Board's (CARB) 2005 guidance

[2122] DRP 2017, pp. 5.11-63 to -74; *Id.,* Appendix 5.11-A
[2123] *Id.,* Appendices 5.11-B and 5.11-C
[2124] *Id.,* pp. 5.11-71 to -74
[2125] *Id.,* Appendix 5.11-C, pp. 2, 3

manual on land use development, *Air Quality and Land Use: A Community Perspective*.[2126] The CARB guidance manual recommends a 500-foot buffer between freeways and sensitive receptors, indicating that further analysis may be in order if the proposed sensitive receptor is located within this buffer.[2127] The Appendix 5.11-C modeling confirms that incremental cancer risks for the 70-year exposure duration are below 10 in 1 million at locations greater than 150 feet from the travel lanes and thus would not exceed applicable thresholds of significance.[2128] The estimated hazard index for all proposed sensitive receptors would be significantly less than one in a million at locations greater than 150 feet from the SR-138 travel lanes and thus would not exceed applicable thresholds of significance.[2129] This determination is consistent with the Antelope Valley Area Plan EIR, which concluded that potential adverse effects to sensitive receptors located in proximity to SR-138 would be less than significant with mitigation.[2130]

TACs are a class of air pollutants that may cause or contribute to an increase in mortality or serious illness, or which may post a present or potential hazard to human health.[2131] Mobile Source Air Toxics are subset of TACs emitted by mobile sources, such as diesel particulate matter (DPM).[2132] DPM is that portion of diesel fueled engine exhaust that is collected via a particulate matter sampling method and which contains many of the toxic components of diesel exhaust, including acrolein, benzene, 1,3-butadiene, formaldehyde, napthalene, and polycyclic organic matter.[2133,2134] Appendix 5.11-C provides an analysis of potential health risk impacts associated with diesel exhaust which represents the primary cause of health risk within the South Coast Air Basin (air basin). The SCAQMD MATES-IV Study states that diesel particulates represent approximately 80 percent of health risk in the SoCAB.[2135] Of the other TACs specifically identified by the Commenter - acrolein and polycyclic organic matter did not make the list of the top 25 TACs that contribute to overall health risk in the basin. Based on data provided within the MATES-IV study, it can be concluded that each of these pollutants contribute less than 0.00001 percent risk within the air basin. The other TACs identified within the comment – 1, 3-butadiene, benzene, formaldehyde and naphthalene result in a combined risk of approximately 11 percent within the air basin. Because 92 percent of risk levels occurring within the air basin are due to mobile sources, the proportion of risks from diesel exhaust and the other TACs would be comparable to those discussed in the MATES-IV Study. As such, the other TACs identified by the comment (1, 3-butadiene, benzene, formaldehyde and naphthalene) would contribute marginally (approximately

2126 *Id.,* p. 1
2127 *Ibid.*
2128 *Id.,* p. 5.11-73; *Id.,* Appendix 5.11-C, p. 3
2129 *Ibid.*
2130 DRP 2014a, p. 5.3-43
2131 California Health & Safety Code §39655(a); 14 CCR §§ 93000, 93001
2132 United States Environmental Protection Agency (USEPA). 2016. Gasoline Mobile Source Air Toxics. Washington DC: USEPA. https://www.epa.gov/gasoline-standards/gasoline-mobile-source-air-toxics.
2133 California Air Resources Board (CARB). 2000. Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. Sacramento, CA: CARB. https://www.arb.ca.gov/diesel/documents/rrpapp.htm.
2134 California Air Resources Board (CARB). 1998. Report to the Air Resources Board on the Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant. CARB Scientific Review Panel. Sacramento, CA: CARB. https://www.arb.ca.gov/toxics/dieseltac/part_a.pdf.
2135 South Coast Air Quality Management District. 2015. Final Report Multiple Air Toxics Exposure Study in the South Coast Air Basin. Diamond Bar, CA: USEPA. http://www.aqmd.gov/home/library/air-quality-data-studies/health-studies/mates-iv.

11 percent) to the health risks identified for the Project site exposure to emissions from SR-138.

As shown in Exhibit Response F.8-196, Sheets A through C, the 70-year cancer risks at the proposed residential uses range from 4 to 5 in a million. As shown in Table 5.11-24 of the Draft EIR, existing residential uses were exposed to less than 1 in a million for cancer risk due to the Project. The addition of 11 percent to these risk values would still result in health risks which are substantially below the significance threshold of 10 in a million. Because the HRA assessed the primary cause of health risk exposure to existing and proposed residential uses, and because the additional risk associated with the other TACs identified in the comment would not result in combined risk levels that would exceed the significance threshold of 10 in a million, the impacts findings disclosed in Section 5.11 of the Draft EIR would remain unchanged – i.e., the estimated hazard index for all proposed sensitive receptors would be significantly less than one in a million at locations greater than 150 feet from the SR-138 travel lanes and thus would not exceed applicable thresholds of significance.

To address the potential impact to sensitive receptors located within 150 feet of the SR-138 travel lanes, MM 11-10 imposes a 150-foot buffer from such travel lanes within which the Project will be prohibited from siting new sensitive receptor uses. As an added layer of protection, MM 11-11 further requires that prior to future tract map approvals, if any sensitive receptors (e.g. residential, day care, schools, hospitals) would be located within 500 feet of the SR-138, an additional dispersion modeling study must be conducted to estimate diesel PM air concentrations. If the study finds that diesel PM TAC emissions would be significant at the location of a proposed sensitive receptor, then effective TAC reduction measures must be implemented to mitigate for interior air quality, such as filtration technologies or equivalent protections against TACs from vehicle emissions.

In addition, MM 11-11 has been revised in this Final EIR to further insure that sensitive receptors are protected at the Project site from emissions generated by high-volume roadways, as discussed in response to Comment F.8-189. Specifically, MM 11-11 has been revised to, among other things, require preparation of a dispersion analysis to calculate the health risks from vehicle emissions whenever the Project proposes a tentative map that would locate sensitive receptors within 500 feet of a "high-volume" roadway (i.e., a roadway with an average daily traffic volume that equals or exceeds 50,000 vehicles), in addition to SR-138. Moreover, as more stringent vehicular greenhouse gas emission and criteria air pollution standards take effect, and as transportation fuels and vehicles become cleaner over time, the number of diesel powered vehicles on roadways as well as emissions from remaining newer diesel engines are expected to further reduce diesel-related health risks at the Project site.[2136]

Draft EIR Appendix 5.11-B, *Air Quality Analysis for Stationary Sources*, further evaluates Project air quality impacts of stationary sources of emissions that are permitted to be located on the Project in accordance with the Centennial Specific Plan. This analysis addressed

[2136] DRP 2017, pp. 5.21-7, -8, -23

health risks associated with TACs and characterizes the sources of criteria pollutants to quantify their emissions.[2137]

This study included the following components:

1. An evaluation of the Project's TAC emissions to ensure that the health risks posed to sensitive receptors by stationary sources located in the Project's Business Park area are not in excess of applicable significance thresholds;
2. An evaluation of the Project's TAC emissions to ensure that the health risks posed to sensitive receptors by discrete stationary sources that may located in the Project's Commercial and Institutional areas are not in excess of applicable significance thresholds;
3. An evaluation of the TAC emissions that would be generated by the Project's two wastewater reclamation facilities (WRF) to ensure that the health risks posed to adjacent stationary sources are not in excess of applicable thresholds; and
4. An evaluation of stationary sources that emit criteria pollutants having ambient air quality standards to assess the potential of violating these standards.

As explained in the Draft EIR, modeling described in Appendix 5.11-B confirms that none of the sensitive receptors located adjacent to the Project's Business Park areas would be exposed to TAC emissions that exceed a cancer of risk of 10 in 1 million or have a chronic non-cancer hazard index of 1.0, provided there is minimum buffer area between the sensitive receptor and the Business Park area.[2138] In order to ensure that the Project's future tract maps incorporate this required buffer area, MM 11-7 requires the establishment of buffer areas in the Project equivalent to those used for the TAC modeling. Moreover, per MM 11-8, no sensitive use (e.g., school, hospital, day care center) may be located within a Business Park area unless the Project Applicant/Developer provides written evidence to the County that sensitive use would not be exposed to TAC with pollutant concentrations resulting in a cancer risk greater than or equal to 10 in 1 million for health risks and 1.0 for non-cancer chronic and acute hazard indices.

There are several discrete types of equipment with TAC emissions levels less than those described previously for stationary sources that would be permitted in the Commercial and Institutional areas on the Project site, including natural gas-fired boilers, emergency generators, gas stations, spray booths, storage tanks, dry cleaners, and small-source particulate matter (PM) generators.[2139] The Appendix 5.11-B modeling analysis confirms that the aggregate risk from these TAC-emitting sources would be below significance thresholds with implementation of MM 11-1, which requires all such stationary sources to comply with the parameters stated in the Stationary Source Types, Size Limits, and Quantity Estimates set forth in Draft EIR Table 5.11-5 and which is included as Attachment A to the Project's Mitigation Monitoring and Reporting Program.[2140] Should there be a need or

[2137] *Id.,* Appendix 5.11-B, p. 4
[2138] *Id.,* p. 5.11-69
[2139] *Id.,* p. 5.11-70
[2140] *Ibid.*

request for a stationary source exceeding the prescribed limits, MM 11-1 requires the Project Applicant/Developer to apply for a source-specific permit from the AVAQMD or the SCAQMD, as applicable.

Draft EIR Appendix 5.11-B also includes a screening health risk assessment conducted to evaluate the air concentration at the nearest sensitive receptors to the WRFs. The results of the screening analysis demonstrate that the estimated incremental cancer risk, chronic and acute health indexes from all WRFs would be less than the significance thresholds at the maximally exposed sensitive receptor location and thus impacts from TAC emissions generated by the WRFs would be less than significant.[2141]

Although not required by CEQA, as confirmed by the Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, Appendix 5.11-C also evaluates the estimated cancer risks and chronic and acute non-cancer hazard indices at the future Project residences and other sensitive uses (after Centennial Buildout) caused by emissions generated by offsite National Cement Lebec Plant and determined that any related health risk are below the AVAQMD's and SCAQMD's thresholds if significance (i.e., 10 in 1 million for cancer risk and 1.0 for HI). The cancer risk at the northernmost portion of the Project site was estimated to be 0.15 in 1 million; the chronic and acute non-cancer hazard indices estimated for this location were 0.01 and 0.12, respectively. Based on the results presented in Draft EIR Appendix 5.11-C, the Draft EIR determined that the cement plant is not expected to cause unacceptable risks to future residents at Centennial.[2142]

The Commenter cites *San Joaquin Raptor Rescue Center v. County of Merced* (2010) 149 Cal.App.4th 645 ("*San Joaquin Raptor*") to support its claim that the EIR does not include sufficient information to enable the public or County decision makers to meaningfully consider the potential public health impacts of the Project's air emissions. In San Joaquin Raptor, the court determined that an EIR for the expansion of an aggregate mining operation was inadequate because it assumed that the project would not substantially increase annual production, but also admitted that the expanded mine would have a maximum annual production level twice the size of the baseline average annual production level. In contrast, here, the Draft EIR accurately describes the Project's scope of development and Section 5.11 provides a full accounting of the Project's estimated construction and operational emissions and sets forth a comprehensive analysis of the potential health impacts associated with Project emissions that relies on multiple Project-specific health risk assessments that go beyond the requirements of CEQA. Indeed, this comment's claim that the Draft EIR simply provides emission levels and a general description of health impacts misrepresents the extensive administrative record and is not supported by the facts. Thus, the Commenter's reliance on *San Joaquin Raptor* is misplaced.

[2141] *Ibid.*; *Id.,* Appendix 5.11-B, p. 19-22
[2142] *Id.,* p. 5.11-71; *Id.,* Appendix 5.11-C, p. 9

In response to this comment, the following document is hereby added to the administrative record:

California Air Resources Board (CARB). 2000. Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. Sacramento, CA: CARB. https://www.arb.ca.gov/diesel/documents/rrpapp.htm.

California Air Resources Board (CARB). 1998. Report to the Air Resources Board on the Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant. CARB Scientific Review Panel. Sacramento, CA: CARB. https://www.arb.ca.gov/toxics/dieseltac/part_a.pdf.

South Coast Air Quality Management District. 2015. Final Report Multiple Air Toxics Exposure Study in the South Coast Air Basin. Diamond Bar, CA: USEPA. http://www.aqmd.gov/home/library/air-quality-data-studies/health-studies/mates-iv.

United States Environmental Protection Agency (USEPA). 2016. Gasoline Mobile Source Air Toxics. Washington DC: USEPA. https://www.epa.gov/gasoline-standards/gasoline-mobile-source-air-toxics.

Response to Comment F.8-197:

As this comment accurately states, the EIR estimates that the Project would create 23,675 permanent jobs and have a maximum resident population of 57,150 persons at buildout.[2143] This comment claims that, according to the latest US census figures, the average percent of the U.S. population in the civilian workforce is 63.3 percent. The U.S. Bureau of Labor Statistics indicates that, between January and October 2017, the U.S. civilian labor force participation rate has ranged between 62.7 percent and 63.0 percent, which is comparable to the 63.3 percent figure cited by the Commenter.[2144] Thus, the Commenter's claim that the employed population of the proposed Project is approximately 36,176 is a reasonable estimation.

However, as discussed in response to Comment F.8-82, the Draft EIR never claims or assumes that all jobs created by the Project will be filled by Project residents, as this comment implies. Rather, the Draft EIR and the Centennial Specific Plan Traffic Study, Appendix 5.10-A, *Centennial Traffic Study,* rely on the North County Sub-Area Traffic Demand Forecasting Model (North County Sub-Area Model) to estimate the volume of external and internal trips within the Project area based on parameters such as regional population and employment projections and the relative distances between areas for which trips will be made.[2145] The North County Sub-Area Model was originally developed for use in the Northwest 138 Corridor Improvement Project in conjunction with the Los Angeles County

2143 *Id.,* p. 5.9-1

2144 United States Bureau of Labor Statistics (USBLS). 2017, November 7. Labor Force Statistics from the Current Population Survey. Washington DC: USBLS. https://data.bls.gov/timeseries/LNS11300000.

2145 DRP 2017, p. 5.10-49; DRP 2014a, p. 5.16-25

Metropolitan Transportation Authority (Metro) and Caltrans.[2146] The model is a derivative of the SCAG 2012 RTP/SCS traffic model and is consistent with SCAG's regional population and employment forecasts.[2147] The model was refined for use in the *Antelope Valley Area Plan* (AVAP), which was adopted by the County in June 2015.

As shown in Draft EIR Table 5.10-19 and Traffic Study Table 3-3, the North County Sub-Area Model determined that 52 percent of the average daily total trips generated by the Project would occur external to the Project site. As shown on Traffic Study Table 3-5,[2148] the average external trip generated by the Project would be 45.9 miles in length. Thus, the modeled average external trip length extends to the major employment areas in the vicinity of the Project site, including the City of Bakersfield (approximately 50 miles north), the City of Santa Clarita (approximately 35 miles south), the City of Lancaster (approximately 36 miles east), and the City of Palmdale (approximately 43 miles east).[2149] Indeed, as shown on Draft EIR Exhibit 5.10-7, the vast majority of the Project's external trips will be distributed south to Santa Clarita or east to Lancaster/Palmdale, all of which are well within 45.9 miles of the Project site. As explained in Section 5.11, Air Resources,[2150] vehicle use emissions were calculated on the basis of the traffic data included in the Traffic Study. Accordingly, the EIR's mobile emissions calculations take into account all of the Project's external trips to off-site employment uses, despite this comment's claim to the contrary.

The Lead Agency is entitled to rely on expert traffic model estimates as substantial evidence of a project's likely traffic impacts, including the air emissions associated with such traffic trips.[2151] This comment does not question the accuracy of the North County Sub-Area Traffic Model, nor does it provide evidence that the model is unreliable. Please see response to Comment F.8-23 for a more detailed discussion regarding the reliability of the North County Sub-Area Model.

With regard to this comment's claim that the Project would only provide jobs to workers with a specific research and development (R&D) skill set, many of the Project's onsite jobs will be located in areas designated in the Specific Plan as Business Park.[2152] This land use designation provides for a variety of commercial uses in addition to research and development (R&D), including light industrial, manufacturing, professional office, private educational and trade schools and smaller commercial services required to support these uses.[2153] Moreover, the full range of jobs associated with Specific Plan's Business Park, Commercial, Mixed Use, Institutional/Civic, School, and Utility land use designations would provide for a variety jobs that require both skilled and non-skilled workers and which could be filled by residents of the Project with a variety of skill sets and educational backgrounds.

2146 DRP 2017, p. 5.10-3
2147 *Ibid.*
2148 *Id.,* Appendix 5.10-A, p. 3.9
2149 *Id.,* p. 1-2
2150 *Id.,* p. 5.11-18
2151 *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal* (1988) 47 Cal.3d 376, 410; *National Parks & Conserv. Ass'n v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1362
2152 DRP 2017, p. 5.9-29
2153 *Id.,* Appendix 4.0-A, p. 2-31

With regard to this comment's assertion that the EIR does not propose meaningful air quality mitigation measures, please see response to Comment F.8-198.

In response to this comment, the following document is hereby added to the administrative record:

United States Bureau of Labor Statistics (USBLS). 2017, November 7. Labor Force Statistics from the Current Population Survey. Washington DC: USBLS. https://data.bls.gov/timeseries/LNS11300000.

Response to Comment F.8-198:

This comment's opinion that MMs 11-4, 11-5, and 11-6 are inadequate and fail to address the Project's potential air quality impacts related to external automobile trips is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. As this comment accurately notes, and as disclosed in Section 5.11, Air Resources,[2154] the Draft EIR determined that the Project's long-term operational emissions would exceed the AVAQMD annual emissions thresholds and the SCAQMD daily emissions thresholds for VOC, NOx, CO, PM10 and PM2.5. As disclosed in the Draft EIR,[2155] mobile emissions would be the dominant source of NOx, CO, PM10, and PM2.5 emissions, as this comment correctly notes. However, the EIR determined that the dominant source of Project-related VOC emissions would be consumer products, not mobile emissions.[2156]

This comment correctly notes that the Draft EIR identifies MMs 11-4, 11-5, and 11-6 as mitigation measures that would reduce the Project's long-term operational emissions by ensuring that the Project is required to provide adequate bicycle parking, preferential parking for alternative-fueled vehicles, and EV charging infrastructure to serve Project parking lots, parking structures, and residential and non-residential buildings.[2157] For a more detailed discussion of the EV charging infrastructure to be provided by the Project, please see response to Comment F.8-95, which revises MMs 11-4 and 11-6 to clarify their applicability to the Project consistent with the CALGreen Tier 1 voluntary measures.

However, this comment incorrectly claims that the Draft EIR only relies on MMs 11-4, 11-5, and 11-6 to address Project impacts related to mobile emissions. As discussed in response to Comment F.8-96, the Draft EIR also includes 13 additional mitigation measures that will reduce Project mobile emissions, including MM 10-1 (Project intranet to promote carpooling and transit use), MM 10-25 (Mobility Plan), MM 10-26 (Transportation Demand Management), MM 11-2 (off-road emission control equipment requirements), MM 14-1 (complete streets, bicycle rack, and trails requirements), MM 21-4 (off-road equipment idling restrictions), MM 21-14 (affordable housing requirements), MM 21-15 (residential EV charging), MM 21-16 (EV charging infrastructure), MM 21-17 (ZEV preferential parking requirements), MM 21-18 (bicycle parking requirements), MM 21-19 (EV charging

2154 *Id.,* pp. 5.11-52 to -54
2155 *Id.,* p. 5.11-53
2156 *Ibid*.
2157 *Id.,* p. 5.11-54

infrastructure), and MM 21-20 (compliance with regulatory programs). See also response to Comment F.8-204 for a detailed a discussion of the various measures the Project will undertake to reduce its overall emissions profile.

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

Consistent with Smart Growth principles, Medium- to Very High-Density development is generally included in the central area of each Village, and the density of development progressively lowers with increased distances from core areas, called the Village Core, Town Center or Neighborhood Center.[2158] The Town Center of the Project is located in Village 3, and is the "downtown" area of the Project; Villages 1, 2, 5, and 7 each have a Village Core, and Villages 6, 8, and 9 each have a Neighborhood Center.[2159] An 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center.[2160] Moreover, to reduce vehicle miles traveled, the Project includes an integrated network of roadways, walking and biking trails to reduce automobile use and facilitate safe and efficient travel. An extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) would link residential, schools, shopping, and employment areas.[2161] One hundred percent (100 percent) of all residential development will be located within ¼ miles walking distance of a park, trailhead, club house or other public amenity, and an 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center.[2162]

2158 *Id.,* p. 4-16
2159 *Ibid.*
2160 *Id.,* pp. 4-16 and -17
2161 *Id.,* p. 4-6
2162 *Id.,* Id., pp. 4-16 and -17

Finally, as discussed in response to Comment F.8-79, the Project is required to comply with a variety of legal mandates to reduce project-related mobile emissions, as identified in the following table:

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
Building Components/Facility Operations		
Roofs/Ceilings/Insulation	CALGreen Building Code (Title 24, Part 11, "CALGreen") Building Energy Efficiency Standards (Title 24, Part 6)	The Project must comply with efficiency standards regarding roofing, ceilings, and insulation. For example: Roofs/Ceilings: New construction must reduce roof heat island effects per CALGreen Building Code section 106.11.2, which requires use of roofing materials having a minimum aged solar reflectance, thermal emittance complying with section A5.106.11.2.2 and A5.106.11.2.3 or a minimum aged Solar Reflectance Index (SRI) as specified in Tables A5.106.11.2.2, or A5.106.11.2.3. Roofing materials must also meet solar reflectance and thermal emittance standards contained in Title 20 Standards. Roof/Ceiling Insulation: There are also requirements for the installation of roofing and ceiling insulation. (See Title 24, Part 6 Compliance Manual at Section 3.2.2.)
Flooring	CALGreen	The Project must comply with efficiency standards regarding flooring materials. For example, for 80 percent of floor area receiving "resilient flooring," the flooring must meet applicable installation and material requirements contained in CALGreen section 5.504.4.6.
Window and Doors (Fenestration)	Title 24, Part 6	The Project must comply with fenestration efficiency requirements. For example, the choice of windows, glazed doors, and any skylights for the Project must conform to energy consumption requirements affecting size, orientation, and types of fenestration products used. (See Title 24, Part 6 Compliance Manual, Section 3.3.)
Building Walls/Insulation	CALGreen California Energy Code Title 24, Part 6	The Project must comply with efficiency requirements for building walls and insulation. Exterior Walls: Must meet requirements in current edition of California Energy Code, and comply with sections A5.106.7.1 or A5.106.7.2 of CALGreen Building code for wall surfaces, as well as section 5.407.1, which required weather-resistant exterior wall and foundation envelope as required by California Building Code section 1403.2. Construction must also meet requirements contained in Title 24, Part 6, which vary by material

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		of the exterior walls. (See Title 24, Part 6 Compliance Manual, Part 3.2.3.) Demising (Interior) Walls: Mandatory insulation requirements for demising walls (which separate conditioned from non-conditions space) differ by the type of wall material used. (*Id.,* at 3.2.4.) Door Insulation: There are mandatory requirements for air infiltration rates to improve insulation efficiency; they differ according to the type of door. (*Id.,* at 3.2.5.) Flooring Insulation: There are mandatory requirements for insulation that depend on the material and location of the flooring. (*Id.,* at 3.2.6.)
Finish Materials	CALGreen	The Project must comply with pollutant control requirements for finish materials. For example, materials including adhesives, sealants, caulks, paints and coatings, carpet systems, and composite wood products must meet requirements in CALGreen to ensure pollutant control. (CALGreen section 5.504.4.)
Wet Appliances (Toilets/Faucets/Urinals, Dishwasher/Clothes Washer, Spa and Pool/Water Heater)	CALGreen California Energy Code Title 24, Part 6 Appliance Efficiency Regulations ("Title 20 Standards")	Wet appliances associated with the Project must meet various efficiency requirements. For example: Spa and Pool: Use associated with the Project is subject to appliance efficiency requirements for service water heating systems and equipment, spa and pool heating systems and equipment. (Title 24, Part 6, Sections 110.3, 110.4, 110.5; Title 20 Standards, Sections 1605.1(g), 1605.3(g); see also California Energy Code.) Toilets/Faucets/Urinals: Use associated with the Project is subject to new maximum rates for toilets, urinals, and faucets effective January 1, 2016: • Showerheads maximum flow rate 2.5 gpm at 80 psi • Wash fountains 2.2 x (rim space in inches/20) gpm at 60 psi • Metering faucets 0.25 gallons/cycle • Lavatory faucets and aerators 1.2 gpm at 60 psi • Kitchen faucets and aerators 1.8 gpm with optional temporary flow of 2.2 gpm at 60 psi • Public lavatory faucets 0.5 gpm at 60 psi • Trough-type urinals 16 inches length • Wall mounted urinals 0.125 gallons per flush • Other urinals 0.5 gallons per flush

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		(Title 20 Standards, Sections 1605.1(h),(i) 1065.3(h),(i).) Water Heaters: Use associated with the Project is subject to appliance efficiency requirements for water heaters. (Title 20 Standards, Sections 1605.1(f), 1605.3(f).) Dishwasher/Clothes Washer: Use associated with the Project is subject to appliance efficiency requirements for dishwashers and clothes washers. (Title 20 Standards, Sections 1605.1(o), (p), (q), 1605.3(o), (p), (q).)
Dry Appliances (Refrigerator/Freezer, Heater/Air Conditioner, Clothes Dryer)	Title 20 Standards CALGreen	Dry appliances associated with the Project must meet various efficiency requirements. For example: Refrigerator/Freezer: Use associated with the Project is subject to appliance efficiency requirements for refrigerators and freezers. (Title 20 Standards, Sections 1605.1(a), 1605.3(a).) Heater/Air Conditioner: Use associated with the Project is subject to appliance efficiency requirements for heaters and air conditioners. (Title 20 Standards, Sections 1605.1(b),(c),(d),(e), 1605.3(b),(c),(d),(e) as applicable.) Clothes Dryer: Use associated with the Project is subject to appliance efficiency requirements for clothes dryers. (Title 20 Standards, Section 1605.1(q).)
	CALGreen	Installations of HVAC, refrigeration and fire suppression equipment must comply with CALGreen Sections 5.508.1.1 and 508.1.2, which prohibits CFCs, halons, and certain hydrochlorofluorocarbons and hydrofluorocarbons.
Lighting	Title 20 Standards	Lighting associated with the Project will be subject to energy efficiency requirements contained in Title 20 Standards. General Lighting: Indoor and outdoor lighting associated with the Project must comply with applicable appliance efficiency regulations (Title 20 Standards, Sections 1605.1(j),(k),(n), 1605.3(j),(k),(n).) Emergency lighting and self-contained lighting associated with the Project must also comply with applicable appliance efficiency regulations (Title 20 Standards, Sections 1605.1(l), 1605.3(l).)

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		Traffic Signal Lighting: For any necessary Project improvements involving traffic lighting, traffic signal modules and traffic signal lamps will need to comply with applicable appliance efficiency regulations (Title 20 Standards, Sections 1605.1(m), 1605.3(m).)
	Title 24, Part 6	Lighting associated with the Project will also be subject to energy efficiency requirements contained in Title 24, Part 6, which contains energy standards for non-residential indoor lighting and outdoor lighting. (See Title 24 Part 6 Compliance Manual, at Sections 5, 6.) Mandatory lighting controls for indoor lighting include, for example, regulations for automatic shut-off, automatic daytime controls, demand responsive controls, and certificates of installation. (*Id.,* at Section 5.) Regulations for outdoor lighting include, for example, creation of lighting zones, lighting power requirements, a hardscape lighting power allowance, requirements for outdoor incandescent and luminaire lighting, and lighting control functionality. (*Id.,* at Section 6.)
	Assembly Bill 1109	Lighting associated with the Project will be subject to energy efficiency requirements adopted pursuant to AB 1109. Enacted in 2007, AB 1109 required the CEC to adopt minimum energy efficiency standards for general purpose lighting, to reduce electricity consumption 50 percent for indoor residential lighting and 25 percent for indoor commercial lighting.
Bicycle and Vehicle Parking	CALGreen	The Project will be required to provide compliant bicycle parking, fuel-efficient vehicle parking, and electric vehicle charging spaces (CALGreen Sections 5.106.4, 5.106.5.1, 5.106.5.3)
	Title 24, Part 6	The Project is also subject to parking requirements contained in Title 24, Party 6. For example, parking capacity is to meet but not exceed minimum local zoning requirements, and the Project should employ approved strategies to reduce parking capacity (Title 24, Part 6, Section 106.6.)
Landscaping	CALGreen	The CALGreen Building Code requires and has further voluntary provisions for: • A water budget for landscape irrigation use; • For new water service, separate meters or submeters must be installed for indoor and

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		outdoor potable water use for landscaped areas of 1,000- 5,000 square feet; • In, non-residential projects with 1,000-2,000 square feet of landscaped areas, install irrigation controllers and sensors that follow specified criteria; • Provide water-efficient landscape design that reduces use of potable water beyond initial requirements for plant installation and establishment.
	Executive Order B-29-15	The Project is also subject to emissions reduction requirements to be achieved by implementation of Executive Order B-29-15. This emergency executive order directs the Department of Water Resources to lead a statewide initiative to replace 50 million square feet of lawns and ornamental turf with drought tolerant landscapes. The order also directed the departments to update the Model Water Efficient Landscaping Ordinance, which they did in 2015.
	Model Water Efficient Landscaping Ordinance	The model ordinance promotes efficient landscaping in new developments and establishes an outdoor water budget for new and renovated landscaped areas that are 500 square feet or larger. (California Code of Regulations, Title 23, Division 2, Chapter 2.7.)
	Cap-and-Trade Program	Transportation fuels used in landscape maintenance equipment (e.g., gasoline) would be subject to the Cap-and-Trade program. (See "Energy Use," below.)
Refrigerants	CARB Management of High Global Warming Potential Refrigerants for Stationary Sources	Any refrigerants associated with the Project will be subject to CARB standards. CARB's Regulation for the Management of High Global Warming Potential Refrigerants for Stationary Sources 1) reduces emissions of high-Global Warming Potential refrigerants from leaky stationary, non-residential refrigeration equipment; 2) reduces emissions resulting from the installation and servicing of stationary refrigeration and air conditioning (R/AC) appliances using high-GWP refrigerants; and 3) requires verification of greenhouse gas (GHG) emission reductions. (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5.1, Section 95380 et seq.)

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
Consumer Products	CARB High-Global Warming Potential Greenhouse Gases in Consumer Products	All consumer products associated with the project will be subject to CARB standards. CARB's consumer products regulations set volatile organic compound (VOC) limits for numerous categories of consumer products, and limits the reactivity of the ingredients used in numerous categories of aerosol coating products (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 8.5.)
Construction		
Use of Off-Road Diesel Engines, Vehicles, and Equipment	CARB In-Use Off-Road Diesel Vehicle Regulation	Any relevant vehicle or machine use associated with the Project will be subject to CARB standards. The CARB In-Use-Off-Road Diesel Vehicle Regulation applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulations: 1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; 2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System, DOORS) and labeled; 3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and 4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies, VDECS (i.e., exhaust retrofits). The requirements and compliance dates of the Off-Road regulation vary by fleet size, as defined by the regulation.
	Cap-and-Trade Program	Transportation fuels (e.g., gasoline) used in equipment operation would be subject to the Cap-and-Trade Program. (See "Energy Use," below.)
Pollutant Control	CALGreen	If an HVAC system is used during construction, the Project must use return air filters with a MERV of 8, based on ASHRAE 52.2-1999, or an average efficiency of 30 percent based on ASHRAE 5.2.1-1992. All filters must be replaced immediately prior to occupancy. (CALGreen Section A5.504.1.3.)
Greening New Construction	CALGreen	All new construction, including the Project, must comply with the California Green Building Code, or "CALGreen", as discussed in more detail throughout this table. Adoption of the mandatory CALGreen standards for commercial construction has been essential for improving the overall environmental performance of new commercial buildings; it also sets voluntary targets for builders to exceed the mandatory requirements.

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
Construction Waste	CALGreen	The Project will be subject to CALGreen requirements for construction waste reduction, disposal, and recycling, such as a requirement to recycle and/or salvage for reuse a minimum of 50 percent of the non-hazardous construction waste in accordance with Section 5.408.1.1, 5.408.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent.
Worker, vendor and truck vehicle trips (on-road vehicles)	Cap-and-Trade Program	Transportation fuels (e.g., gasoline) used in worker, vendor and truck vehicle trips would be subject to the Cap-and-Trade Program. (See "Energy Use," below.)
Solid Waste		
Solid Waste Management	Landfill Methane Control Measure	Waste associated with the Project will be disposed per state requirements for landfills, material recovery facilities, and transfer stations. Per the statewide GHG emissions inventory, the largest emissions from waste management sectors come from landfills, and are in the form of methane. In 2010, CARB adopted a regulation that reduces emissions from methane in landfills, primarily by requiring owners and operators of certain uncontrolled municipal solid waste landfills to install gas collection and control systems, and requires existing and newly installed gas and control systems to operate in an optimal manner. The regulation allows local air districts to voluntarily enter into a memorandum of understanding with CARB to implement and enforce the regulation and to assess fees to cover costs of implementation.
	Mandatory Commercial Recycling (AB 341)	AB 341 will require the Project, if it generates four cubic yards or more of commercial solid waste per week, to arrange for recycling services, using one of the following: self-haul; subscribe to a hauler(s); arranging for pickup of recyclable materials; subscribing to a recycling service that may include mixed waste processing that yields diversion results comparable to source separation. The Project will also be subject to local commercial solid waste recycling program required to be implemented by each jurisdiction under AB 341.
	CALGreen	The Project will be subject to CALGreen requirement to provide areas that serve the entire building and are identified for the depositing, storage and collection of nonhazardous materials for recycling (CALGreen Section 5.410.1.)

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
Energy Use		
Electricity/Natural Gas Generation	Cap-and-Trade Program	Electricity and natural gas usage associated with the Project will be subject to the Cap-and-Trade Program. The rules came into effect on January 1, 2013, applying to large electric power plants and large industrial plants. In 2015, importers and distributors of fossil fuels were added to the Cap-and-Trade program in the second phase. Specifically, on January 1, 2015, cap-and-trade compliance obligations were phased in for suppliers of natural gas, reformulated gasoline blendstock for oxygenate blending (RBOB), distillate fuel oils, and liquefied petroleum gas that meet or exceed specified emissions thresholds. The threshold that triggers a cap-and-trade compliance obligation for a fuel supplier is 25,000 metric tons or more of CO2e annually from the GHG emissions that would result from full combustion or oxidation of quantities of fuels (including natural gas, RBOB, distillate fuel oil, liquefied petroleum gas, and blended fuels that contain these fuels) imported and/or delivered to California.
Energy Efficiency	Zero Net Energy Buildings (Title 24, Part 6)	The Project will be subject to net energy construction requirements contained in Title 24, Part 6. California revised building energy efficiency requirements contained in Title 24 in 2014 to require that all residential buildings be Zero Net Energy by 2020, and all commercial buildings must follow suit by 2030. MMs 21-2 and 21-3 further obligate the Project to comply with CALGreen voluntary measure A5.203.1.2.1, which requires newly constructed low-rise residential buildings to exceed the 2016 Title 24 energy efficiency requirements by 15 percent, and newly constructed nonresidential buildings to exceed the 2016 Title 24 energy efficiency requirements by 10 percent.
Renewable Energy	California Renewable Portfolio Standards (RPS) (Senate Bill X1-2 and 350)	Energy providers associated with the Project will be required to comply with Renewable Portfolio Standards set by SB X1-2 and 350. SB X1-2 requires IOUs, POUs, and ESPs to increase purchases of renewable energy such that at least 33 percent of retail sales are procured from renewable energy resources by December 31, 2020. In the interim each entity was required to procure an average of 20 percent of renewable

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		energy for the period of January 1, 2011 through December 31, 2013; and will be required to procure an average of 25 percent by December 31, 2016, and 33 percent by 2020. Senate Bill 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030.
	Million Solar Roofs Program (Senate Bill 1)	The Project will participate in California's energy market, which is affected by implementation of the Million Solar Roofs Program. As part of Governor Arnold Schwarzenegger's Million Solar Roofs Program, California has set a goal to install 3,000 megawatts of new, solar capacity by 201. The Million Solar Roofs Program is a ratepayer-financed incentive program aimed at transforming the market for rooftop solar systems by driving down costs over time.
	California Solar Initiative - Thermal Program	The Project will participate in California's energy market, which is affected by implementation of the California Solar Initiative -Thermal Program. The program offers cash rebates of up to $4,366 on solar water heating systems for single-family residential customers. Multifamily and Commercial properties qualify for rebates of up to $800,000 on solar water heating systems and eligible solar pool heating systems qualify for rebates of up to $500,000. Funding for the CSI-Thermal program comes from ratepayers of PG&E, SCE, SoCalGas, and SDG&E. The rebate program is overseen by the California Public Utilities Commission as part of the California Solar Initiative.
	Waste Heat and Carbon Emissions Reduction Act (AB 1613, AB 2791)	The Project will participate in California's energy market, which is affected by implementation of the Waste Heat and Carbon Emissions Reduction Act. Originally enacted in 2007 and amended in 2008, this act directed the CEC, PUC, and CARB to implement a program that would encourage the development of new combined heat and power systems in California with a generating capacity of not more than 20 megawatts, to increase combined heat and power use by 30,000 GWh. The CPUC publicly owned electric utilities, and CEC duly established policies and procedures for the purchase of electricity from eligible combined heat and power systems. CEC guidelines require combined heat and power systems to be designed to reduce waste energy;

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		have a minimum efficiency of 60 percent; have NOx emissions of no more than 0.07 pounds per megawatt-hour; be sized to meet eligible customer generation thermal load; operate continuously in a manner that meets expected thermal load and optimizes efficient use of waste heat; and be cost effective, technologically and feasible, environmentally beneficial.
Vehicular/Mobile Sources		
General	SB 375 and SCAG RTP/SCS	The Project complies with, and is subject to, the SCAG adopted RTP/SCS, which CARB approved as meeting its regional GHG targets in 2016.
Fuel	Low Carbon Fuel Standard (LCFS)/ Executive Order S-01-07	Auto trips associated with the Project will be subject to LCFS (Executive Order S-01-07), which requires a 10 percent or greater reduction in the average fuel carbon intensity by 2020 with a 2010 baseline for transportation fuels in California regulated by CARB. The program establishes a strong framework to promote the low carbon fuel adoption necessary to achieve the Governor's 2030 and 2050 greenhouse gas goals.
	Cap-and-Trade Program	Use of gasoline associated with the Project will be subject to the Cap-and- Trade Program. The rules came into effect on January 1, 2013, applying to large electric power plants and large industrial plants. In 2015, importers and distributors of fossil fuels were added to the Cap-and-Trade program in the second phase. Specifically, on January 1, 2015, cap-and-trade compliance obligations were phased in for suppliers of natural gas, reformulated gasoline blendstock for oxygenate blending (RBOB), distillate fuel oils, and liquefied petroleum gas that meet or exceed specified emissions thresholds. The threshold that triggers a cap-and-trade compliance obligation for a fuel supplier is 25,000 metric tons or more of CO2e annually from the GHG emissions that would result from full combustion or oxidation of quantities of fuels (including natural gas, RBOB, distillate fuel oil, liquefied petroleum gas, and blended fuels that contain these fuels) imported and/or delivered to California.
Automotive Refrigerants	CARB Regulation for Small Containers of Automotive Refrigerant	Vehicles associated with the project will be subject to CARB's Regulation for Small Containers of Automotive Refrigerant. (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5, Section

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		95360 et seq.) The regulation applies to the sale, use, and disposal of small containers of automotive refrigerant with a GWP greater than 150. The regulation achieves emission reductions through implementation of four requirements: 1) use of a self-sealing valve on the container, 2) improved labeling instructions, 3) a deposit and recycling program for small containers, and 4) an education program that emphasizes best practices for vehicle recharging. This regulation went into effect on January 1, 2010 with a one-year sell-through period for containers manufactured before January 1, 2010. The target recycle rate is initially set at 90 percent and rises to 95 percent beginning January 1, 2012.
Light-Duty Vehicles	Assembly Bill 1493 (or the Pavley Standard)	Cars that drive to and from the Project will be subject to AB 1493, which directed the Air Resources Board (CARB) to adopt a regulation requiring the maximum feasible and cost-effective reduction of greenhouse gas (GHG) emissions from new passenger vehicles. Pursuant to AB 1493, CARB adopted regulations that establish a declining fleet average standard for carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), and hydrofluorocarbons (air conditioner refrigerants) in new passenger vehicles and light-duty trucks beginning with the 2009 model year and phased-in through the 2016 model year. These standards are divided into those applicable to lighter and those applicable to heavier portions of the passenger vehicle fleet. The regulations will reduce "upstream" smog-forming emissions from refining, marketing, and distribution of fuel.
	Advanced Clean Car and Zero Emissions Vehicle (ZEV) Programs	Cars that drive to and from the Project will be subject to the Advanced Clean Car and Zero Emissions Vehicle Programs. In January 2012, the Air Resources Board approved a new emissions-control program for model years 2017 through 2025. The program combines the control of smog, soot and global warming gases and requirements for greater numbers of zero-emission vehicles into a single package of standards called Advanced Clean Cars. By 2025, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions. The ZEV program will act as the focused technology of the Advanced Clean Cars program by requiring

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		manufacturers to produce increasing numbers of ZEVs and plug-in hybrid electric vehicles in the 2018-2025 model years.
	Tire Inflation Regulation	Cars that drive to and from the Project will be subject to the CARB Tire Inflation Regulation, which took effect on September 1, 2010, and applies to vehicles with a gross vehicle weight rating (GVWR) of 10,000 pounds or less. Under this regulation, automotive service providers must, inter alia, check and inflate each vehicle's tires to the recommended tire pressure rating, with air or nitrogen, as appropriate, at the time of performing any automotive maintenance or repair service, and to keep a copy of the service invoice for a minimum of three years, and make the vehicle service invoice available to the CARB, or its authorized representative upon request.
	EPA and NHTSA GHG and CAFE standards.	Mobile sources that travel to and from the project would be subject to EPA and NHTSA GHG and CAFE standards for passenger cars, light-duty trucks, and medium-duty passenger vehicles. (75 FR 25324–25728 and 77 FR 62624–63200.)
Medium- and Heavy-Duty Vehicles	CARB In-Use On-Road Heavy-Duty Diesel Vehicles Regulation (Truck and Bus Regulation)	Any heavy-duty trucks associated with the Project will be subject to CARB standards. The regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet PM filter requirements. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. The regulation applies to nearly all privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds.
	CARB In-Use Off-Road Diesel Vehicle Regulation	Any relevant vehicle or machine use associated with the Project will be subject to CARB standards. The CARB In-Use-Off-Road Diesel Vehicle Regulation applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulations: 1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; 2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System, DOORS) and

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		labeled; 3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and 4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies, VDECS (i.e., exhaust retrofits). The requirements and compliance dates of the Off-Road regulation vary by fleet size, as defined by the regulation.
	Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Regulation	Any relevant vehicle or machine use associated with the Project will be subject to CARB standards. The CARB Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Regulation applies to heavy-duty tractors that pull 53-foot or longer box- type trailers. (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 1, Section 95300 et seq.) Fuel efficiency is improved through improvements in tractor and trailer aerodynamics and the use of low rolling resistance tires.
	EPA and NHTSA GHG and CAFE standards.	Mobile sources that travel to and from the project would be subject to EPA and NHTSA GHG and CAFE standards for medium- and heavy-duty vehicles. (76 FR 57106–57513.)
Water Use		
Water Use Efficiency	Emergency State Water Board Regulations	Water use associated with the Project will be subject to recent emergency regulations. On May 18, 2016, partially in response to Executive Order B-27-16, the State Water Board adopted emergency water use regulations (California Code of Regulations, title 23, section 864.5 and amended and re-adopted sections 863, 864, 865, and 866). The regulation directs the State Water Board, Department of Water Resources, and Public Utilities Commission to implement rates and pricing structures to incentivize water conservation, and calls upon water suppliers, homeowners' associations, California businesses, landlords and tenants, and wholesale water agencies to take stronger conservation measures.
	Executive Order B-37-16	Water use associated with the Project will be subject to Emergency Executive Order B-37-16, issued May 9, 2016, which directs the State Water Resources Control Board to adjust emergency water conservation regulations through the end of January 2017 to reflect differing water supply conditions across the state.

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		The Water Board must also develop a proposal to achieve a mandatory reduction of potable urban water usage that builds off the mandatory 25 percent reduction called for in Executive Order B-29-15. The Water Board and Department of Water Resources will develop new, permanent water use targets to which the Project will be subject. The Water Board will permanently prohibit water-wasting practices such as hosing off sidewalks, driveways, and other hardscapes; washing automobiles with hoses not equipped with a shut-off nozzle; using non- recirculated water in a fountain or other decorative water feature; watering lawns in a manner that causes runoff, or within 48 hours after measurable precipitation; and irrigating ornamental turf on public street medians.
	Executive Order B-40-17	Executive Order B-40-17 lifted the drought emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne. It also rescinds Executive Order B-29-15, but expressly states that Executive Order B-37-16 remains in effect and directs that State Water Resources Control Board to continue development of permanent prohibitions on wasteful water use to which the Project will be subject.
	Senate Bill X7-7	Water provided to the Project will be affected by Senate Bill X7-7's requirements for water suppliers. Senate Bill X7-7, or the Water Conservation Act of 2009, requires all water suppliers to increase water use efficiency. It also requires, among other things, that the Department of Water Resources, in consultation with other state agencies, develop a single standardized water use reporting form, which would be used by both urban and agricultural water agencies.
	CALGreen	The Project is subject to CALGreen's water efficiency standards, including a required 20 percent mandatory reduction in indoor water use. (CALGreen, Division 4.3.)
	California Water Code, Division 6, Part 2.10, Sections 10910–10915.	Development and approval of the project requires the development of a project-specific Water Supply Assessment.
	Kern County Landscaping	The project would be subject to Kern County's Landscaping Requirements and Water Efficient

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
	Requirements and Water Efficient Landscaping.	Landscaping ordinances. (Kern County Code of Ordinances, Title 19, Chapter 19.86, Sections 19.86.050 and 19.86.060.)
	Cap-and-Trade Program	Electricity usage associated with water and wastewater supply, treatment and distribution would be subject to the cap-and-trade program.
	California Renewable Portfolio Standards (RPS) (Senate Bill X1-2 and 350)	Electricity usage associated with water and wastewater supply, treatment and distribution associated with the Project will be required to comply with Renewable Portfolio Standards set by SB X1-2 and 350.
Water Recycling	Water Reclamation Requirements for Recycled Water Use. SWRCB Order WQ 2016-0068- DDW	These requirements replace 2014-0090-DWQ General Waste Discharge Requirements for Recycled Water Use and establish standard conditions for recycled water use and conditionally delegates authority to an Administrator to manage a Water Recycling Program and issue Water Recycling Permits to recycled water users. Only treated municipal wastewater for non-potable uses can be permitted, such as landscape irrigation, crop irrigation, dust control, industrial/commercial cooling, decorative fountains, etc. Potable reuse is not covered.
	Regulations for Groundwater Replenishment Using Recycled Water	This emergency rulemaking by the California Department of Public Health (California Title of Regulations, Title 22, Sections 60301.050 et seq.), effective June 18, 2014, applied to Groundwater Replenishment Reuse Projects (GRRPs) utilizing surface application, which received initial permits from the Regional Board. The regulations address permitting and plan approval, sampling requirements, operation requirements, and ongoing reporting requirements.
	Policy for Water Quality Control for Recycled Water. SWRCB Resolution No. 2009-, as amended by Resolution No. 2013-0003	The project would be subject to the State Water Resources Control Board statewide mandate to increase recycled water usage by 0.2 million acre-feet per year by 2020.

Response to Comment F.8-199:

The Commenter's observation that the Project impacts area where attainment planning for air quality standards is challenging is noted. This comment's assertion that the EIR understates "the magnitude of problem and impacts" is not supported by the facts. Indeed, Section 5.11.2, Air Resources,[2163] discloses that the Western MDAB, over which the AVAQMD has jurisdiction, has not yet demonstrated attainment for O3, but explains that the AVAQMD's Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Non-attainment Area) demonstrates that the AVAQMD will attain the 1997 8-hour O3 NAAQS by 2021. Moreover, Section 5.11.2[2164] also discloses that the SoCAB, over which the SCAQMD has jurisdiction, has been designated nonattainment for various O3 and PM2.5 NAAQS, but explains that the SCAG 2016 AQMP sets forth measures to attain such standards as follows: 8-hour O3 (75 parts per billion [ppb]) by 2031; Annual PM2.5 by 2025; 8-hour O3 (80 ppb) by 2023; 1-hour O3 (120 ppb) by 2022; 24-hour PM2.5 by 2019.

The Commenter's request states that the "The EIR must also prepare proper modeling to analyze the potential for drift and project emissions from mobile sources as they would be affecting the Mojave Desert and San Joaquin Valley Air Basin". The Commenter's request for air basin scale modeling for an individual project is not consistent with the assessment recommendations established by air districts within the State of California for project-level analyses, as discussed in response to Comment F.8-195. This comment accurately notes that ozone and particulate matter are capable of being transported between air basins, as discussed in response to Comment F.8-195. This comment also accurately notes that the Project has the potential to generate emissions in the South Coast, Mojave Desert and San Joaquin Air Basins, as disclosed in Section 5.11, Air Resources, and as discussed in response to Comment F.8-195. With regard to this comment's assertion that the EIR needs to fully analyze the Project's potential impacts on adjacent air basins, please see response to Comment F.8-195. Contrary to this comment's claim, the Draft EIR does not simply assert that the Project will only affect air basins where the Project is physically located, as explained in response to Comment F.8-195.

The Draft EIR takes a conservative approach to analyzing the Project's overall emissions against the AVAQMD's and SCAQMD's thresholds of significance. Specifically, in both cases, the Draft EIR assumes that all of the Project's vehicle miles traveled (VMT) would occur in the air basin over which the relevant air district has jurisdiction. Thus, when assessing the significance of Project air emissions against the SCAQMD thresholds, the Draft EIR assumes that the Project's total VMT would occur in the SoCAB. Likewise, when assessing the significance of Project emissions against the AVAQMD's threshold, the Draft EIR assumes that the Project's total VMT would occur in the MDAB.

In response to this comment, for informational purposes only, Project vehicle miles traveled (VMT) has been disaggregated by the air district where such VMT is projected to occur, as

[2163] *Id.,* p. 5.11-14
[2164] *Id.,* pp. 5.11-15 and -16

set forth in Final EIR Appendix 5.11-E, Supplemental Information Concerning Centennial Air Quality Analysis. Of this total VMT, 43.11 percent would occur in the portion of the MDAB under the jurisdiction of the AVAQMD, and 44.37 percent would occur within the portion of the SoCAB under the jurisdiction of the SCAQMD. The remaining Project VMT is distributed as follows: 11.26 percent within the portion of the SJVAB under the jurisdiction of the SJVAPCD; 0.89 percent within the portion of the MDAB under the jurisdiction of the EKAPCD; 0.37 percent within the portion of the SCCAB under the jurisdiction of the VCAPBD. Project mobile emissions occurring within each air district are set forth in Tables 7 and 8 of Final EIR Appendix 5.11-E.

Response to Comment F.8-200:

Without explanation or supporting evidence, this comment claims that the EIR air quality analysis overestimates the internal traffic capture rate and fails to project an accurate trip length. As discussed in responses to Comments F.8-82 and F.8-197, the Draft EIR and its Traffic Study rely on the North County Sub-Area Model to estimate the volume and length of the Project's external and internal vehicle trips based on parameters such as regional population and employment projections and the relative distances between areas for which trips will be made.[2165] The North County Sub-Area Model was originally developed for use in the Northwest 138 Corridor Improvement Project in conjunction with Los Angeles County Metropolitan Transportation Authority (Metro) and Caltrans.[2166] The model is a derivative of the SCAG 2012 RTP/SCS traffic model and is consistent with SCAG's regional population and employment forecasts.[2167] The model was refined for use in the *Antelope Valley Area Plan* (AVAP), which was adopted by the County in June 2015. The Lead Agency is entitled to rely on expert traffic model estimates as substantial evidence of a project's likely traffic impacts, including the air emissions associated with such traffic trips.[2168] This comment does not question the accuracy of the North County Sub-Area Traffic Model, nor does it provide evidence that the model is unreliable. Please see response to Comment F.8-23 for a more detailed discussion of the reliability of the North County Sub-Area Traffic Model.

As shown in Draft EIR Table 5.10-19 and Traffic Study Table 3-3, the North County Sub-Area Model determined that 52 percent of the average daily total trips generated by the Project would occur external to the Project site and 48 percent would occur internal to the site. As shown on Traffic Study Table 3-5,[2169] the average external trip generated by the Project would be 45.9 miles long, whereas the average internal trip would be 3.4 miles long. Thus, the modeled average external trip length extends to the major employment areas in the vicinity of the Project site, including the City of Bakersfield (approximately 50 miles north), the City of Santa Clarita (approximately 35 miles south), the City of Lancaster (approximately 36 miles east), and the City of Palmdale (approximately 43 miles east).[2170] Indeed, as shown on Draft EIR Exhibit 5.10-7, the of vast majority of the Project's external trips will be

2165 *Id.*, p. 5.10-49; DRP 2014a, p. 5.16-25
2166 DRP 2017, p. 5.10-3
2167 *Ibid.*
2168 *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal* (1988) 47 Cal.3d 376, 410; *National Parks & Conserv. Ass'n v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1362
2169 DRP 2017, Appendix. 5.10-A, p. 3.9
2170 *Id.,* p. 1-2

distributed south to Santa Clarita or east to Lancaster/Palmdale, all of which are well within 45.9 miles of the Project site. As explained in Section 5.11, Air Resources,[2171] vehicle use emissions were calculated on the basis of the traffic data included in the Traffic Study. Accordingly, the EIR's mobile emissions calculations take into account all of the Project's external trips to off-site employment uses, despite this comment's claim to the contrary.

The Lead Agency disagrees with this comment's assertion that the Draft EIR ignores the existing jobs/housing imbalance in the Project area, and it disagrees that the region will be unable to provide jobs for Project residents. As an initial matter, the jobs/housing balance in the AVAP planning area was 1.3 before the AVAP was adopted and the jobs/housing balance upon buildout of the AVAP planning area is projected to be 1.3.[2172] This ratio is within the range for an ideal jobs-housing balance, as determined by leading experts.[2173] Thus, the County does not agree with this comment's claim that there is an existing jobs/housing imbalance in the Project area.

The County also disagrees with this comment's claim that the region will be unable to provide jobs to Project residents. As discussed in Section 5.9, *Population, Housing, and Employment*, SCAG projects that regional employment between 2012 and 2040 will increase by approximately 2.432 million jobs or at a rate of 1.17 percent per year to 2040.[2174] SCAG projects that the North Los Angeles County Subregion will experience a higher job growth rate than the County as a whole.[2175] As shown in Draft EIR Table 5.9-19 between 2020 and 2035, the North Los Angeles County Subregion is projected to experience a 22.1 percent increase in employment, compared to an 8.6-percent increase in the County as a whole.[2176] Between 2035 and 2040, the job base in this Subregion would increase by another 8.7 percent.[2177] This Subregion is projected to account for 12.3 percent of the County's new job growth between 2020 and 2040.[2178] At the TAZ level, SCAG projects a 6,643-job increase from 2012 to 2020 for TAZ 202800000 (which includes the Project site north of SR-138) and a 2,855-job increase for TAZ 20281000 (which includes the Project site south of SR-138) for the same time period.[2179] An increase of 16,766 jobs for TAZ 202800000 but 468 new jobs for TAZ 20281000 are expected from 2012 to 2040.[2180] A total of 23,931 jobs in both TAZs is projected by 2040.[2181] The Project's 23,675 jobs would represent 98.93 percent of the projected 2040 jobs base of 23,931 jobs in both TAZs.[2182]

As discussed in response to Comment F.8-20, the AVAP establishes a strategy of designating areas for light and heavy industrial uses near major transportation corridors and/or a concentration of skilled labor force in EOAs. The Project would implement this strategy

2171 *Id.,* p. 5.11-18
2172 DRP 2014a, p. 5.13-6
2173 *Ibid.*
2174 DRP 2017, p. 5.9-18
2175 *Id.,* p. 5.9-19
2176 *Id.,* p. 5.9-20
2177 *Ibid.*
2178 *Ibid.*
2179 *Id.,* p. 5.9-29
2180 *Ibid.*
2181 SCAG 2012e, 2015d
2182 *Ibid.*

through the development of commercial and business park uses on the site and along SR-138, for use by high-tech manufacturing, transportation, and logistics companies. In addition, commercial areas, schools, and institutional uses are proposed within the residential villages, which would also increase the employment base at the site and in the area. The Project's 23,675 new jobs would expand the employment base in an area that is largely rural residential in land use and would improve the jobs-housing ratio in the Antelope Valley. While the Project would have an on-site jobs-housing ratio of 1.22 at buildout, the Project would create jobs in the West EOA where job growth is planned by the County and in areas that are designated for non-residential development on the AVAP's Land Use Policy Map. Thus, the Project would positively contribute to the attainment of the target jobs/housing ratio of 1.3 jobs per dwelling unit for the unincorporated area of the Antelope Valley.

The Commenter cites *Kings County Farm Bureau v. City of Hanford* ("*Kings County*") to support its claim that the EIR's air quality analysis is inadequate for purportedly underestimating average Project vehicle trip lengths. In that case, however, the Court rejected an EIR for coal-fired cogeneration plan for improperly limiting the scope of its cumulative air quality impact analysis to only considering the cumulative impacts of the Project and other coal-fired cogeneration plants located in a small portion of the San Joaquin Valley Air Basin, rather than considering all 116 cogeneration plants located in the entire Air Basin.[2183] Kings County, however, is inapplicable to this EIR because it does not rely on the "list of projects" method of evaluating a project's cumulative impacts authorized by CEQA Guidelines §15130(b), as was the case in *Kings County*. Rather, this EIR relies on the "summary of projections" approach to cumulative impact analysis authorized by CEQA Guidelines §15130(b), having determined that the "list of projects" approach "would capture only a portion of the expected growth in the area" and would thus be insufficiently conservative [2184] This EIR thus evaluates the Project cumulative effects in a manner that accounts for the total regional growth projections described in the County's General Plan, the AVAP, and the SCAG 2016 RTP/SCS.[2185] Thus, unlike the EIR in *Kings County*, this EIR did not artificially narrow the scope of its cumulative impact analysis by only considering a list of projects confined to a small geographic area.

In support of its claim that Los Angeles County, Kern County, and San Bernardino County rank among the nation's worst in overall ozone and PM 2.5 pollution, the Commenter cites to *State of the Air 2016*, a document prepared by the American Lung Association. This document is addressed in response to Comment F.8-189. It should be noted, however, that the cited document confirms the ALA's determination that that Southern California shows a "continued reduction in ozone and particle pollution as well as other pollutants for decades" thanks to stronger regulatory standards for pollutants and pollution sources.[2186]

[2183] 221 Cal.App.3d 692, 722-72
[2184] DRP 2017, p. 7-3
[2185] *Id.*, p. 7-3 to -5
[2186] American Lung Association 2016, p. 4

Please see response to Comments F.8-189 for a discussion of the Project's potential air quality impacts on Southern California air basins, including the South Coast Air Basin, South Coast Air Basin, San Joaquin Valley Air Basin, and Mojave Desert Air Basin.

With regard to this comment's assertion that the Project constitutes "leapfrog development," please see response to Comments F.8-20.

Response to Comment F.8-201:

With regard to this comment's concerns regarding MM 11-4, please see response to Comment F.8-95, which revises MM 11-4 to specify the conditions under which multiple charging spaces will be required, consistent with 2016 CALGreen Code Tier 1 voluntary measures.

With regard to this comment's concerns regarding MM 11-6, please see response to Comment F.8-95, which revises MM 11-6 to specify the conditions under which multiple charging spaces will be required in parking structures with 20 or more parking spaces and multifamily residential buildings, consistent with 2016 CALGreen Code Tier 1 voluntary measures.

With regard to this comment's claim that the Draft EIR makes no mention of making electric charging stations accessible to residential buildings, please see response to Comment F.8-95, which revises MMs 11-6 and 21-19 to specify the conditions under which multiple charging spaces will be required in multifamily residential buildings, consistent with 2016 CALGreen Code Tier 1 voluntary measures. Response to Comment F.8-95 also revises MM 21-15 to clarify that the Project shall install one 208/240 VAC receptacle that may be used for charging electric vehicles in each detached and attached single-family home in a manner consistent with 2016 CALGreen Code Tier 1 voluntary measures.

As this comment correctly explains, CEQA Guidelines §15126.4(a)(2) requires that Project mitigation measures must be fully enforceable through permit conditions, agreements or other legally binding instruments. All mitigation measures adopted for the Project will be included in the Project's enforceable Mitigation Monitoring and Reporting Program (MMRP) and Project compliance with the MMRP will be incorporated as an enforceable condition of Project approval, including approval of all Project tentative subdivision maps.

The Lead Agency disagrees with this comment's claim that the Draft EIR does almost nothing to facilitate the use of electric vehicles. Indeed, the mitigation measures described above go well beyond the mandatory regulatory requirements with respect to the provision of EV charging infrastructure, as discussed in detail in response to Comment F.8-95.

Response to Comment F.8-202:

This comment accurately states that MM 11-5 requires the Project's plans and specifications for residential, hotel and motel buildings to provide adequate short-term and long-term bicycle parking to promote bicycle use. This comment is also correct that MM 11-5 supplements other proposed measures that would promote bicycle use in the Centennial

Specific Plan area, such as the Project's proposed multi-modal trails network and its "smart growth" land use plan, which sites commercial and civic uses in close proximity to residential uses and bicycle infrastructure. As this comment accurately notes, such measures should be encouraged as they will reduce vehicle trips and related mobile emissions.

The County disagrees with this comment's speculation that the occasional heat wave presents a significant obstacle to widespread adoption of bicycle use by Specific Plan residents and visitors. As explained on page 3-2 of the Draft EIR, temperatures in the area rarely exceed 100 degrees Fahrenheit (°F) and the average temperature in the vicinity between 2012 and 2014 was 67 °F. Indeed, the average temperatures of Neenach, CA, just east of the Project site, are similar to the average temperatures of Davis, CA.[2187,2188] According to CARB, the City of Davis has the highest per capita rate of bicycling in the United States due to its land use and transportation policies that place a strong emphasis on the provision of adequate and safe bicycle facilities similar to those that would be provided by the Project.[2189] Accordingly, the occasional heat wave is not expected to present a significant obstacle to the use of bicycle transportation by Project residents and visitors.

This comment's concerns related to bicycle use for trips external to the Project site are noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. As explained in Section 5.10, Traffic Access and Circulation, as part of the Project's overall transportation demand management (TDM) strategy to reduce the dependence on the private automobile, which would result in a consequential reduction in overall volume of Project-generated trips off site, the Project Applicant will be required to participate in or form a Transportation Management Association (TMA) to serve the residents and employees of businesses within the Project area or will be organized in conjunction with an existing organization in the Antelope Valley or Santa Clarita area. If the former, the Centennial TMA will specifically develop strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations in order to maximize transit efficiencies and services. Such coordination will also help match ride sharers and provide information on transit options. The TMA's purpose will be to coordinate and facilitate transit and rideshare usage to serve as many riders as possible. Commuter buses that may be utilized by Project residents to travel to and from the Santa Clarita Valley, Antelope Valley and the Tejon Ranch Commerce Center are expected to lead to 100 less vehicle trips to and from the Santa Clarita Valley and 50 less vehicle trips to and from the Antelope Valley during peak hours on weekdays.

Rideshare programs are also expected to lead to a net reduction of single occupancy vehicle trips to (AM) and from (PM) the Santa Clarita Valley and a net reduction of single occupancy vehicle trips from (AM) and to (PM) the Antelope Valley. A total of 200 vehicle trips to and from the Santa Clarita Valley and 110 trips to and from the Antelope Valley would be reduced

2187 Weatherbase.com. 2017a. *Metrological Data for Neenach, California*. http://www.weatherbase.com/weather/weather.php3?s=221640.

2188 Weatherbase.com. 2017b. *Metrological Data for Davis, California*. http://www.weatherbase.com/weather/weather.php3?s=492240&cityname=Davis-California-United-States-of-America.

2189 California Air Resources Board (CARB). 2017. *ARB Bicycle Awareness Program*. Sacramento, CA: CARB. https://www.arb.ca.gov/planning/tsaq/bicycle/factsht.htm.

by commuter buses and rideshare programs. Under MM 10-26, TDM measures such as the transit and rideshare program will be implemented at the onset of Project development, although conceivably on a smaller scale and expanded as demand increases through buildout.

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

California Air Resources Board (CARB). 2017. *ARB Bicycle Awareness Program*. Sacramento, CA: CARB. https://www.arb.ca.gov/planning/tsaq/bicycle/factsht.htm.

Weatherbase.com. 2017a. *Metrological Data for Neenach, California*. http://www.weatherbase.com/weather/weather.php3?s=221640.

Weatherbase.com. 2017b. *Metrological Data for Davis, California*. http://www.weatherbase.com/weather/weather.php3?s=492240&cityname=Davis-California-United-States-of-America.

Response to Comment F.8-203:

This comment accurately quotes Public Resources Code §21100(b)(3) and its requirement that the EIR set forth feasible mitigation measures to minimize significant environmental effects of the Project. This comment also accurately quotes CEQA Guidelines §15126.4(a)(1)(B) and its requirement that the EIR discuss mitigation options and the basis for selecting a particular mitigation measure. Finally, this comment accurately quotes Public Resources Code §21002 and its statement that lead agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures that will avoid or substantially lessen the significant environmental effects of such projects.

Please see response to Comment F.8-204, which addresses mitigation measures proposed by the Commenter for inclusion in the EIR.

Response to Comment F.8-204:

This response addresses the Commenter's suggestion for the addition of mitigation for air quality and greenhouse gas impact suggested by: (1) the San Joaquin Valley Air Pollution Control District in 2006-2012 ("SJVAPCD List"); (2) the Bay Area Air Quality Management District in 2011 ("BAAQMD List"); (3) the Sacramento Metropolitan Air Quality Management District in 2016 ("SMAQMD List"); (4) the San Luis Obispo County Air Pollution Control District in 2012 ("SLOAPCD List"); (5) the California Air Pollution Control Officers' Association list in 2008 ("CAPCOA List"); and (6) the California Attorney General's Office in 2010 ("AG List"). Further information about each of these lists follows, and each listed measure and a corresponding response is included in the tables that follow.

- The SJVAPCD List includes clusters of GHG measures by topic (e.g., transit infrastructure, rideshare operational, etc.). All of these topical clusters are reprinted and responded to in the table below. Following the clusters of identified measures by

topic, the SJVAPCD provides a long list of individual, uncategorized mitigation measures, many of which overlap with measures included in the topical clusters. To the extent they overlap, they have not been reproduced twice, but all new measures that appear in the individual list are reprinted and responded to in the tables below. Per the website at which the list is available, the SJVAPCD last updated the list in 2012.[2190] The Project is not located within the jurisdictional boundaries of the SJVAPCD, and the SJVAPCD list is an advisory guidance for consideration by lead agencies within the SJVAPCD that is not required to be implemented even within the SJVAPCD by law or regulation, or SJVAPCD rule.

- The BAAQMD List includes GHG measures to reduce operational-related emissions of criteria air pollutants, precursors, and GHGs from mobile, area, and stationary sources.[2191] Each of these is reprinted and responded to in the tables, below. The Project is not located within the jurisdictional boundaries of the BAAQMD, and the BAAQMD list is an advisory guidance for consideration by lead agencies within the BAAQMD that is not required to be implemented even within the BAAQMD by law or regulation, or BAAQMD rule.
- The SMAQMD List includes measures available to reduce ozone precursor, particular matter and GHG emissions from project.[2192] The Project is not located within the jurisdictional boundaries of the SMAQMD, and the BAAQMD list is an advisory guidance for consideration by lead agencies within the SMAQMD that is not required to be implemented even within the SMAQMD by law or regulation, or SMAQMD rule.
- The SLOAPCD List includes measures available to reduce ozone precursor, particulate, diesel particular, and GHG emissions from residential, commercial, and industrial land uses.[2193] The Project is not located within the jurisdictional boundaries of the SLOAPCD, and the SLOAPCD list is an advisory guidance for consideration by lead agencies within the SLOAPCD that is not required to be implemented even within the SLOAPCD by law or regulation, or SLOAPCD rule.
- The CAPCOA List identifies measures to reduce a project's GHG emissions.[2194] CAPCOA is not a public agency, and its list is advisory. The CAPCOA list is included in

2190 San Joaquin Valley Air Pollution Control District (SJVAPCD). 2017 (November, accessed). San Joaquin Valley Air Pollution Control District Mitigation Measures. http://www.valleyair.org/transportation/Mitigation-Measures.pdf.

2191 Bay Area Air Quality Management District (BAAQMD). 2011 (May). California Environmental Quality Act Air Quality Guidelines. San Francisco, CA: BAAQMD. http://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CEQA/BAAQMD%20CEQA%20Guidelines%20May%202011.ashx?la=en.

2192 BAAQMD. 2016 (September 26). *Recommended Guidance for Land Use Emission Reductions Version 3.3 (for Operational Emissions)*. San Francisco, CA: BAAQMD. http://www.airquality.org/LandUseTransportation/Documents/SMAQMD%20Land-Use-Emission-Reductions-FINALv3-3.pdf.

2193 San Luis Obispo County Air Pollution Control District (SLOAPCD). 2012 (April). CEQA Air Quality Handbook: A Guide for Assessing the Air Quality Impacts for Projects Subject to CEQA Review. San Luis Obispo, CA: SLOAPCD. http://www.slocleanair.org/images/cms/upload/files/CEQA_Handbook_2012_v2%20%28Updated%20November%202017%29_LinkedwithMemo%281%29.pdf.

2194 California Air Pollution Control Officers Association (CAPCOA). 2008 (January). CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act. Sacramento, CA: CAPCOA. http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf.

an informational report that expressly clarifies that it is not intended to, and has no, regulatory or legal status.

- The Commenter provided a 2010 list prepared by the Attorney General (AG). The AG List is advisory, and listed measures are not required to be implemented by law or statute. The AG list no longer appears on the AG's GHG or CEQA website. Instead, the AG website identifies and links to a separate report prepared in 2008 by the California Office of Planning & Research, which includes a list of GHG measures as Attachment 3 ("2008 OPR List").[2195] The 2008 list is advisory, and listed measures are not required to be implemented by law or statute. This response considers all measures in both the AG List and 2008 OPR List.

Although not specifically identified by the Commenter, two additional lists of GHG measures were issued following publication of the Draft EIR. The measures on these two new lists are likewise addressed in the tables that follow:

- The 2017 Office of Planning and Research General Plan Guidelines, Appendix A: Example Model Goals, Objectives, and Policies and Programs ("2017 OPR List"), contains examples of mitigation measures that lead agencies could require of individual projects. These are organized into construction and operations related measures.[2196] The 2017 OPR List is advisory, and listed measures are not required to be implemented by law or statute.
- The CARB 2017 Draft Scoping Plan, Appendix B: Local Action ("CARB List"), contains examples of potentially feasible mitigation measures that could be considered for individual projects when a local jurisdiction is the lead agency. These are organized into construction and operations related measures.[2197] CARB's list is likewise advisory,

The tables below address each suggested mitigation measure in these lists.

As background, the Draft EIR includes many mitigation measures, which would reduce GHG emissions beyond those already inherent in the Project site and land use plan (e.g., balance mix of residential, employment, school, retail, parking and other uses; distributed village core areas with neighborhood serving uses and schools to encourage walking and biking; tertiary wastewater treatment and site-wide reuse of reclaimed water for outdoor irrigation, etc.), and project features included in the Specific Plan (e.g., comprehensive transportation management program to encourage multi-modal transportation and discourage single-occupancy offsite automobile commute trips; Green Development Program). The list of mitigation measures in Draft EIR Sections 5.11, Air Resources, and 5.21, Climate Change, go beyond the GHG reductions mandated by existing laws and regulations. Responses to the lists considered in the table below describe the extent to which listed measures are already

[2195] State of California Department of Justice (CADOJ). 2017. Mitigation for Greenhouse Gas Emissions. Sacramento, CA: CADOJ. https://oag.ca.gov/environment/ceqa/measures.

[2196] OPR. 2017. Appendix A: Example Model Goals, Objectives, and Policies and Programs. Sacramento, CA: OPR. http://opr.ca.gov/docs/OPR_Appendix_A_final.pdf.

[2197] CARB. 2017 (January). Appendix B: Local Action. Sacramento, CA: CARB. https://www.arb.ca.gov/cc/scopingplan/app_b_local_action_final.pdf.

incorporated into the project site and design and/or Project Design Features ("PDFs"), are already required by law, or are already required by the mitigation measures included in the Draft EIR. For listed measures that are not already applicable to the project, the response includes either acceptance of the suggested new mitigation measure as feasible and applicable, acceptance of a modified form of the suggested new mitigation measure as feasible and applicable, or an explanation as to why the suggested new measure is either not applicable or not feasible (in whole or in part). It is also important to note that California's GHG reduction laws[2198,2199] and regulations continue to evolve, as do technologies and services that reduce energy consumption or GHG. Predicted GHG reduction consequences also continue to be refined based on the increasing availability of actual data and behaviors. For example in the transportation sector, older lists cited by the Commenter such as the 2008 CAPCOA list included a broad range of estimated quantitative GHG reduction measures that could be achieved from the implementation of suggested measures, but in subsequent evaluations the actual quantitative values of suggested GHG measures in some cases could not be quantified (e.g., inclusion of bike racks as a standalone measure could not be shown to result in a measurable GHG reduction), was not achieved in practice (e.g., the effect of fixed route bus services in reducing GHG was uncertain since even with billions invested in recent public transit improvements, transit ridership of buses actually fell nationally as well as within the Los Angeles metropolitan area), or conflicted with emerging technologies and services (e.g., estimated GHG reductions from the 2008 correlation between GHG and reducing vehicle miles travelled (VMT) grew weaker as vehicular fleets burned less fossil fuels as a result of better gas mileage in standard and hybrid cars, and increasing numbers of cars using electric and other non-petroleum fuels). Predicted VMT reductions from substantially enhanced transit services in the region were also not achieved, and regional VMT actually increased by approximately three percent, based on the emergence of new transportation services such as Lyft and Uber, increased population and employment, issuance of drivers' licenses for undocumented immigrants, lower than predicted gasoline prices, and an extreme housing crisis that prompted much lengthier commutes as workers live further from coastal employment centers and caused criteria emissions from the transportation sector to actually increase statewide in 2016. Outside the transportation sector, GHG reduction efforts have also evolved over time. For example, much more electricity is being produced from wind and solar sources[2200] than was legally required as of the 2008-2010 lists cited by the Commenter, but storage and interstate grid integration challenges have prevented California from fully utilizing current renewable energy supplies under some circumstances. Similarly, numerous new GHG reduction statutes,[2201] as well as new regulations such as those prompted by the recent California drought restricting water use (e.g., for ornamental landscaping including turf) and new energy conservation Building Code upgrades (CALGreen),[2202] have reduced GHG through a variety of measures that deviate from measures on the advisory measure lists provided by the Commenter but are described

2198 S.B. 32, 2015–2016 Reg. Sess. (Cal. 2016); Assemb. B. 32, 2005–2006 Reg. Sess. (Cal. 2006).

2199 See, e.g., California Air Resource Board Scoping Plans for achieving greenhouse gas reduction targets, available here: AB 32 Scoping Plan, CALIFORNIA AIR RESOURCES BOARD (July 14, 2017)

2200 STEPHANIE M. DEHERRERA, DAVID FRIEDMAN, JENNIFER L. HERNANDEZ, In the Name of the Environment: Litigation Abuse Under CEQA, HOLLAND & KNIGHT, August 2015, https://perma.cc/SV3V-F5L2.

2201 S.B. 32, 2015–2016 Reg. Sess. (Cal. 2016); Assemb. B. 32, 2005–2006 Reg. Sess. (Cal. 2006).

2202 CCR, Title 24, Part 11,

in the Regulatory Setting and elsewhere in the Draft EIR's Climate Change section and in the Specific Plan Green Program.

Finally, because there is considerable overlap between the lists of mitigation measures prepared by other agencies, these measures have been organized by topical section in Tables 1 through 9 below, so that similar or overlapping measures are grouped together for the convenience of the reader. Because the CARB List and 2017 OPR List were not suggested by the Commenter but rather were identified by the Lead Agency for consideration, they appear separately in Table 10 below. All measures in this response are quoted verbatim unless otherwise indicated, and for measures with longer text or subparts, numbers and/or bullets have been inserted for ease of reference in responses.

Based on an assessment of all suggested measures, the following mitigation measures have been added to the Draft EIR, as shown in double underlined text:

> **MM 21-21** The Project Applicant/Developer shall require contractors to use locally available and recycled building materials, provided such materials meet all applicable Building Code and other requirements, and are readily available and comparably priced to assure that such materials do not increase the cost and decrease the affordability of housing or community infrastructure.
>
> **MM 21-22** The Project parking lots shall be designed to reduce vehicle queuing and improve pedestrian safety. Parking lot access designs shall include self-enforcement features for reducing the speeds on driveways, such as speed bumps or curved driveways. The parking lots shall include clearly marked pedestrian pathways connecting building entrances to parking, sidewalk, and transit drop-off/pick-up locations.

The following additions are also made to existing mitigation measures, as shown in double-underlined text:

> **MM 10-25~~29~~** *(Traffic Study MM-24)* The Project Applicant/Developer shall implement the Mobility Plan, included as Section 3.2 of the Specific Plan, which provides an extensive system of sidewalks, greenway trails, community trails, a dedicated transit easement, and two transit hubs to serve as alternative means of transportation on the Project site. The Mobility Plan also requires creation and ongoing operation of a Transportation Management Association (TMA) to implement ongoing transportation improvements and programs.

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

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

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

MM 15-2 The Project Applicant/Developer shall demonstrate to the County that they have an executed agreement with all school districts that operate within the boundaries of the Project site. The Transportation Management Association shall coordinate with local schools and school districts to establish and maintain a Safe Routes to School program to facilitate students walking and biking to schools.

Tables 1 through 9 - Responses to Suggested Additional Greenhouse Gas Mitigation Measures

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
Affordable Housing				
1	SMAQMD List, p. 9	Integrate Below Market Rate Housing. Incorporates affordable housing.	Yes	The proposed Project includes affordable housing. Per MM 21-14, "Ten percent of all homes in Centennial communities that permit housing, with the exception of the lowest density area (Community 8-2) will be affordable, in conformance with the Affordable Housing Implementation Plan..." (DRP 2017, p. 5.21-91) Per Specific Plan Section 3.13, the affordability status of homes will be annually monitored through the County of Los Angeles who shall report to the HCD and Los Angeles Community Development Commission. (*Id.,* Appendix 4.0-A, p. 3-101) The Specific Plan specifies that the units shall be constructed simultaneously with overall residential development. (*Id.,* Appendix 4.0-A, p. 3-102) The affordability breakdown will be as follows: • Very Low-Income Units. A total of 387 units (or 20 percent of the Affordable Housing Units) will be affordable to very low-income households. These units are expected to be affordable to households with a gross annual income of 50 percent or less of the Los Angeles County area median income (AMI). • Low-Income Units. A total of 483 units (or 25 percent of the Affordable Housing Units) will be affordable to low income households. These units are intended to be affordable to households with a gross annual income between 51 and 80 percent of the Los Angeles County area median income. • Moderate-Income Units. A total of 1,063 units (or 55 percent of the Affordable Housing Units) will be affordable to moderate income households. These units are planned to be affordable to households with a gross annual income between 81 and 120 percent of the Los Angeles County area median income (*Ibid.*). It is anticipated that most affordable units will be single-family attached, multifamily, and mixed-use units. Units shall be distributed throughout the communities they are in, to integrate them with

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				other market rate housing, and best efforts will be made to ensure that affordable units have similar exterior in terms of quality or appearance as other housing in the Project (*Ibid.*). The Specific Plan also includes an Affordable Housing Implementation Plan that has specific details of the implementation plan, such as a schedule for unit delivery, home ownership financing, and terms of restrictions (Final EIR, Appendix 3-C to Appendix 4.0-A.Rev).
2	CAPCOA List, pp. B-17, B-18	Affordable Housing Component: Residential development projects of five or more dwelling units provide a deed-restricted low-income housing component on-site (or as defined in the code). Developers who pay into In-Lieu Fee Programs are not considered eligible to receive credit for this measure. The award of emission reduction credit shall be based only on the proportion of affordable housing developed on-site because in-lieu programs simply induce a net increase in development. Percentage reduction shall be calculated according to the following formula: % reduction = % units deed-restricted below market rate housing * 0.04	Yes	The proposed Project includes the construction of affordable housing, as discussed in more detail in row 1. Legally binding documents shall establish the affordability of the units, and they shall be deed-restricted. (DRP 2017, Appendix 4.0-A., p. 3-103) The following Affordable Housing categories are allowed under the Centennial Affordable Housing Program: (1) Deed-restricted single-family detached units: a stand-alone, for sale or for rent single housing unit that is made affordable in perpetuity through a legally binding document; (2) Deed-restricted single-family attached: For sale or for rent housing unit that is attached to at least one other housing unit and is made affordable through a legally binding document; and (3) Deed-restricted multifamily: a multifamily building is one with more than four attached residential rental units. A legally binding document establishes the affordability for the entire building for a select number of units within the building in perpetuity (*Ibid.*). See row 1 for further discussion.
3	BAAQMD List, p. 4-13	Affordable Housing	Yes	The proposed Project includes the construction of affordable, deed-restricted housing distributed throughout the community. See rows 1 and 2 for further discussion.
4	SJVAPCD List, p. 12	Designate a portion of residential units as deed-restricted below-market-rate (BMR) housing; Affordable Housing.	Yes	The proposed Project includes the construction of affordable, deed-restricted housing distributed throughout the community. See rows 1 and 2 for further discussion.

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
5	SJVAPCD List, p. 10	Integrate affordable and below market rate housing.	Yes	The proposed Project includes the construction of affordable, deed-restricted housing distributed throughout the community. See rows 1 and 2 for further discussion.
Site Proximity to Uses				
6	CAPCOA List, p. B-15	Density (Employ Sufficient Density for New Residential Development to Support the Use of Public Transit): Project provides high-density residential development. Transit facilities must be within one-quarter mile of project border. Project provides safe and convenient bicycle/pedestrian access to all transit stop(s) within one-quarter mile of project border.	Yes	The Project would develop a diverse range and density of uses within close proximity to each other, including 6,048 medium density residential units, 2,055 high density residential, and 300 very high-density residential units (DRP 2017, pp. 4-19 to 4-21). See rows 14 through 35, below, for further information regarding mix and density of uses. Residential, recreational, and commercial uses have been strategically located to provide superior access, multi-modal design, and ultimately to reduce the number of vehicle on the road (*Id.,* Appendix 4.0-A, p. 1-7). MMs 10-25 and 10-26 require the implementation of on-site programs to reduce vehicle trips, including the formation of a Transportation Management Association (TMA) that would coordinate and manage a Ride Share Program, Transit Program, and Commuter Bus Program (*Id.,* p. 5.10-104). MM 10-25 requires implementation of the Mobility Plan, which includes two transit hubs to serve as alternative means of transportation on the Project site and requires the creation and ongoing operation of the TMA (*Id.,* p. 5.10-153). These mandatory measures require the reduction of single-occupancy automobile use for off-site commutes by 20 percent and require the reduction of single occupancy automobile uses within the Project site by 30 percent (*Ibid*.). MM 10-26 lays out key Transportation Demand Management (TDM) elements that are key to the Mobility Plan and specifies that the TMA will fund and manage ongoing operation of transportation programs, including but not limited to transit and on-demand services (*Id.,* p. 5.10-154). The TMA will partner with multiple transit authorities to provide bus service within the Project site and connecting to neighboring communities (*Id.,* Appendix 4.0-A, p. 1-7). Street network transit facilities will be developed in conjunction with the Project's TDM

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				program and will include the following: Partner with Antelope Valley Transit Authority to provide bus service within the Project and to the rest of the Antelope Valley; Partner with Santa Clarita Transit Authority to provide bus service within the Project and to the rest of the Santa Clarita Valley; Partner with Kern Transit to provide bus service between the Project and neighboring communities of Tejon Mountain Village, Tejon Ranch Commerce Center, and Grapevine, to the north; Provide ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial, and residential areas of the Project; Identify locations for transit centers in proximity to village cores and employment centers such as business parks and institutional/civic land uses (*Id.,* pp. 4-36, 4-37). The following metrics also ensure that the Project can accommodate a community transit system: A transit route easement no less than 25 feet wide shall be reserved in the CCD (connecting the Town Center, BP and I/C areas) and also run northerly connecting to the Village Five Core; If a transit system is implemented, transit stop easements shall be reserved in all Village Cores, the Town Center, and CCD, as well as other areas where necessary, efficient, and beneficial to provide transit access (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 9). Project development will also include safe and convenient bicycle and pedestrian access, including an extensive network of sidewalks and greenway trails. The trails system would be comprised primarily of a County multi-use (hiking, equestrian, and mountain biking) trail and a system of community trails within the street right-of-way that can also be used as a bike path, as trails within the greenways (also considered bike paths), and as Class II Bicycle Lanes (*Id.,* p. 4-38). The trails system would connect residential neighborhoods to commercial, employment, schools, parks, civic, and institutional land uses (*Ibid*.). See Draft EIR Exhibit 4-10a, Centennial Project – Recreation and Trails Plan.

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				By providing a mix of both residential and employment-generating development on site, and in consideration of the Project's location in the vicinity of the Tejon Industrial Complex along the I-5, the Project would capitalize on the existing regional transportation network and would serve to implement regional policies aimed at environmental protection and the location of housing near job opportunities, thus reducing vehicle trips and related emissions (*Id.,* pp. 3-19, 3-20). The Project site is adjacent to, and will be served by the SR-138, and is close to the I-5. See also rows 113 through 127 regarding *Transit Infrastructure and Service*, for further discussion of the Project's contributions toward promoting alternative travel modes and increasing public transit use.
7	SMAQMD List, p. 9	Increase Transit Accessibility. Project near high-quality transit.	Yes	The Project promotes increased use of alternative travel modes, including public transit, and will increase transit accessibility and connections, as discussed in row 6. Notably, the TMA will partner with local transit authorities to provide bus service within the Project and connecting to surrounding areas, and the Project will identify locations for transit centers in proximity to village cores and employment centers such as business parks and institutional/civic land uses (DRP 2017, pp. 4-36, 4-37).
8	SLOAPCD List, p. 3-17	Development is within 1/4 mile of transit centers and transit corridors.	Yes	The Project promotes increased use of alternative travel modes, including public transit, and will increase transit accessibility and connections, as discussed in row 6. Notably, the TMA will partner with local transit authorities to provide bus service within the Project and connecting to surrounding areas, and the Project will identify locations for transit centers in proximity to village cores and employment centers such as business parks and institutional/civic land uses (DRP 2017, pp. 4-36, 4-37).
9	SJVAPCD List, p. 12	1. Project is located within ½ mile of existing or planned Class I or II bike lanes	Yes	1. Project buildout would result in the provision of a network of bike paths, lanes, and routes connecting all Project uses, and two underpasses and one overpass bridge crossing will be constructed across the SR-138 to facilitate bicycle access to employment centers

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
		on arterial/collector streets, or where a suitable parallel route exists. 2. Project is located within ¼- ½ mile of a transit stop. 3. Project is located within one miles of a park and ride lot operated by a transportation agency. 4. Other trip reduction services on site or within ¼ mile of site. 5. Projects that minimize the need for trips that are located near residential, mixed, or retail/commercial use areas that are located within a ¼ mile.		(DRP 2017, pp. 4-35 to 4-36, Exhibit 4-8). See rows 89 through 112 for further discussion regarding bicycle infrastructure. 2. The Project promotes increased use of alternative travel modes, including public transit, and will increase transit accessibility and connections, as discussed in row 6. Notably, the TMA will partner with local transit authorities to provide bus service within the Project and connecting to surrounding areas, and the Project will identify locations for transit centers in proximity to village cores and employment centers such as business parks and institutional/civic land uses (*Id.,* pp. 4-36, 4-37). 3. Project transit centers will provide options for park and ride facilities, shuttle stops, bike rental, and other options for public transit services (*Id.,* Appendix 4.0-A, p. 1-7). The installation of Park-And-Ride Lots near transit stops and carpool lanes that will attract commuters is also included in the roster of potential transportation and vehicle demand measures to be implemented by the TMA to meet transportation demand performance standards articulated in MMs 10-25 and 10-26, as indicated in Table 2-C-2 of the Project's Mobility Plan (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 14). 4. Project buildout would result in consistency with this measure. In addition to the requirements listed in row 6 and in the remainder of this row, the Project will implement numerous trip reduction services, including the measures included in Table 2-C-1 of the Project's Mobility Plan, and a selection from the roster of measures determined appropriate to meet performance standards articulated in MMs 10-25 and 10-26, as listed in Table 2-C-2 in the Mobility Plan (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 5 - 7, 11 - 16). 5. Project buildout would result in consistency with this measure. Its design integrates a wide variety of uses into each of 9 villages. An 80 percent average, but not less than 50 percent of all residential uses will be located within ½ mile of a Village Core of Town Center that includes retail and services uses; all neighborhoods within each village will connect to each other via a network of trails; an extensive

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				network of sidewalks, greenway trails (approximately 13 miles) and community trails (approximately 60 miles) will link residential, schools, shopping, and employment areas; and high-density residential uses will be located adjacent to commercial centers and Mixed-Use Overlay areas will permit the interweaving of residential and commercial uses within very close proximity (*Id.,* pp. 4-34, 4-35).
10	BAAQMD List, p. 4-12	Local serving retail within ½ mile of project	Yes	Project buildout would result in consistency with this measure as part of the Project. The Project provides for a variety of retail and other commercial uses, and has a goal that an 80 percent average, but no less than 50 percent, of all project dwelling units shall be located within a ½ mile walking distance of a Village Core or the Town Center (DRP 2017, p. 4-34; *Id.,* Appendix 4.0-A, p. 3-3). The Project's circulation network, including the extensive network of sidewalks, greenway trails, and community trails, will link residential, schools, shopping, and employment areas for easy and safe access for pedestrians and bicyclists (*Id.,* p. 4-34).
11	CAPCOA List, pp. B-13, B-14	Office/Mixed Use Density: Project provides high density office or mixed-use proximate to transit. Project must provide safe and convenient pedestrian and bicycle access to all transit stops within one-quarter mile.	Yes	Project buildout would result in consistency with this measure. The Project's extensive network of sidewalks, greenway trails, and community trails, will link residential, schools, shopping, and employment areas within the Project site (DRP 2017, p. 4-34). High-density residential uses will be located adjacent to commercial centers and a Mixed-Use Overlay will create areas of mixed residential and commercial center uses (*Id.,* p. 4-35). The Project would also develop a diverse range and density of uses within close proximity to each other and to transit options – see rows 14 through 35, below, for further information.
12	SJVAPCD List, p. 15	Improve destination accessibility such as locating the project within 12 miles from downtown or a job center.	Yes	The Project is bisected by SR-138 and is located approximately one mile east of I-5 for easy access to the highway (DRP 2017, p. 3-1). It is also approximately 1.2 miles west of the community of Neenach, and the community of Gorman is approximately 4 miles north of the I-5/SR-138 junction (*Ibid*.). The Project would include up to 19,333 housing units and an estimate 23,675 permanent jobs in a region of

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				Los Angeles County projected to experience a substantial population growth through 2040, in accordance with Project site location in the AVAP's West EOA, where future growth is planned (*Id.,* p. 3-19). By providing a mix of both residential and employment-generating development on site, and in consideration of the Project's location in the vicinity of the Tejon Industrial Complex along the I-5, the Project would capitalize on the existing regional transportation network and would serve to implement regional policies aimed at environmental protection and the location of housing near job opportunities, thus reducing vehicle trips and related emissions. (*Id.,* pp. 3-19, 3-20) Two underpasses and one overpass over SR-138 will facilitate pedestrian and bicycle access to employment centers, and the trails system would connect residential neighborhoods to commercial, employment, schools, parks, civic, and institutional land uses. (*Id.,* Appendix 4.0-A, p. 3-3; *Id.,* p. 4-38)
13	SMAQMD List, p. 9	Improve Destination Accessibility. Project close to regional employment or destination center.	Yes	The Project is bisected by SR-138 and is located approximately one mile east of I-5 for easy access to the highway. (DRP 2017, p. 3-1) It is also approximately 1.2 miles west of the community of Neenach, and the community of Gorman is approximately 4 miles north of the I-5/SR-138 junction. (*Ibid*.) The Project would include up to 19,333 housing units and an estimate 23,675 permanent jobs in a region of Los Angeles County projected to experience a substantial population growth through 2040, in accordance with Project site location in the AVAP's West EOA, where future growth is planned. (*Id.,* p. 3-19) By providing a mix of both residential and employment-generating development on site, and in consideration of the Project's location in the vicinity of the Tejon Industrial Complex along the I-5, the Project would capitalize on the existing regional transportation network and would serve to implement regional policies aimed at environmental protection and the location of housing near job opportunities, thus reducing vehicle trips and related emissions. (*Id.,* pp. 3-19, 3-20) Two underpasses and one overpass over SR-138 will facilitate pedestrian and bicycle access to employment centers, and the trails system would connect residential neighborhoods to

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				commercial, employment, schools, parks, civic, and institutional land uses. (*Id.,* Appendix 4.0-A, p. 3-3; *Id.,* p. 4-38)
Density and Diversity of Use				
14	SJVAPCD List, p. 12	Increase residential density. Density is measured in terms of dwelling units or jobs per acre.	Yes	The Project would provide residential land uses at varied densities to meet the needs of different segments of the population, consistent with the AVAP. As identified in Draft EIR Table 4-1, Centennial Project Overview, the Project site would allow up to 19,333 dwelling units on 4,987 gross acres of land designated for residential uses. (DRP 2017, p. 4-6) Of the 19,333 dwelling units, 5,175 are Medium Density, 2,055 High Density, and 300 Very High Density units (*Id.,* Table 4-2, Centennial Specific Plan Statistical Table). Consistent with Smart Growth principles, Medium- to Very High Density development is generally included in the central area of each Village, and the density of development progressively lowers with increased distances from core areas, called the Village Core, Town Center or Neighborhood Center. (*Id.,* p. 4-16) The Town Center of the Project is located in Village 3 and is the "downtown" area of the Project; Villages 1, 2, 5, and 7 each have a Village Core, and Villages 6, 8, and 9 each have a Neighborhood Center. (*Ibid*.) An 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center. (*Id.,* pp. 4-16, 4-17) The Project would also provide an anticipated 23,675 permanent jobs. (*Id.,* p. 3-19)
15	SMAQMD List, p. 9	Increase Density. Project more dense than typical developments.	Yes	The Project would provide residential land uses at varied densities to meet the needs of different segments of the population, consistent with the AVAP. As identified in Draft EIR Table 4-1, Centennial Project Overview, the Project site would allow up to 19,333 dwelling units on 4,987 gross acres of land designated for residential uses. (DRP 2017, p. 4-6) Of the 19,333 dwelling units, 5,175 are Medium Density, 2,055 High Density, and 300 Very High Density units (*Id.,* Table 4-2, Centennial Specific Plan Statistical Table).

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
16	BAAQMD List, p. 4-17	100 percent increase in density.	Yes	The Project would provide residential land uses at varied densities to meet the needs of different segments of the population, consistent with the AVAP. As identified in Draft EIR Table 4-1, Centennial Project Overview, the Project site would allow up to 19,333 dwelling units on 4,987 gross acres of land designated for residential uses. (DRP 2017, p. 4-6) Of the 19,333 dwelling units, 5,175 are Medium Density, 2,055 High Density, and 300 Very High Density units (*Id.,* Table 4-2, Centennial Specific Plan Statistical Table).
17	SLOAPCD List, p. 3-17	Design and build compact communities in the urban core to prevent sprawl.	Yes	The Project includes the development of nine planned Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers. The Project does not create sprawl. The Project site is entirely within the AVAP's West EOA, which is a cluster of land planned for higher development densities along the I-380. (DRP 2017, p. 4-4) The Project is consistent with this plan to accommodate anticipated regional growth sustainably while achieving the overall goal of rural preservation in the Antelope Valley. (*Ibid*.) The Project is also situated and designed to promote regional "smart growth" planning principles established by the SCAG 2016-2040 RTP/SCS, Indeed, the South Coast Air Quality Management District (SCAQMD) has determined that the Project's specific plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D4-2). In making this determination, SCAQMD evaluated the Project from a "regional perspective" (see Comment D4-1). See further discussion regarding the Project's smart growth, see response to Comment F.8-20.
18	SLOAPCD List, p. 3-17	Increase density within the urban core and urban reserve lines.	Yes	The Project site is not located in the urban core. However, the Project provides a denser, mixed-use development pattern in an area specifically planned to accommodate anticipated regional growth in the AVAP and SCAG 2012-2035 RTP/SCS and 2016-2040 RTP/SCS, and it exemplifies sustainable community development, as

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				discussed in row 17 and in response to Comment F.8-20. As explained in response to Comment F.8-20, the Project will implement regional plans to reduce GHG emissions generated by the land use sector in a manner that balances increased development in the urban core with strategically located suburban development so as to maximize emissions reductions without disproportionately burdening existing urban core residents with the adverse public health and environmental effects of excessive infill development. The Project achieves the primary goal of increased urban core development – i.e., reducing reliance on single occupancy vehicle use – by including the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers.
19	2008 OPR List p. 18	Encourage infill, redevelopment, and higher density development, whether in incorporated or unincorporated settings	Yes	The Project site in not an infill site. However, it provides dense development on a site planned to accommodate projected growth in a manner consistent with regional strategies for achieving mandatory reductions in GHG emissions attributable to the land use sector, as explained in response to Comment F.8-20. The Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the county's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. Indeed, the South Coast Air Quality Management District (SCAQMD) has determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D4-2) See response to

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				Comment F.8-20 for further discussion. Consistent with Smart Growth principles, Medium- to Very High Density development is generally included in the central area of each Village, and the density of development progressively lowers with increased distances from core areas, called the Village Core, Town Center or Neighborhood Center. (DRP 2017, p. 4-16) The Town Center of the Project is located in Village 3 and is the "downtown" area of the Project; Villages 1, 2, 5, and 7 each have a Village Core, and Villages 6, 8, and 9 each have a Neighborhood Center. (*Ibid*.) An 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center. (*Id.,* pp. 4-16, 4-17)
20	SMAQMD List, p. 9	Increase Diversity. Different types of land uses are near each other.	Yes	The Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers. The Project includes a mix of housing options within each Village, ranging from apartment homes close to the Town Center to single-family homes in lower-density areas. A full range of light industrial, business, and other commercial would yield a broad range of employment opportunities, from retail services to large corporate employers. (DRP 2017, p. 4-10) The Land Use Matrix permits a wide variety of uses in the following categories: residential, agricultural, public and semi-public, commercial, open space/recreation, manufacturing, light industrial, accessory, interim, and temporary. (*Id.,* pp. 4-17, 4-18) The Project includes approximately 130,680 sf of Recreation/Entertainment uses (clubhouse, farmers market, childcare facilities, health clubs) on approximately 75 acres. (*Id.,* p. 4-6) Proposed sites for major Utility facilities that would serve the entire community (e.g., wastewater reclamation facilities, water treatment facility, water bank, materials recovery facility) encompass about 191 acres, and Kindergarten through 12th grade (K-12 schools would be located on about 145 acres. (*Ibid*.) About 5,624 acres (or 45.6 percent) of the Project site are proposed for Open Space for natural resource protection and greenways, and parks for active and passive recreational use. (*Ibid*.) The Project also

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				includes a vehicular and non-vehicular circulation system; the Project includes an integrated network of roadways, walking and biking trails to reduce automobile use and facilitate safe and efficient travel. (*Ibid*.) An extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) would link residential, schools, shopping, and employment areas. (*Ibid*.) 100 percent of all residential development will be located within ¼ miles walking distance of a park, trailhead, club house or other public amenity, and an 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center. (*Id.,* pp. 4-16, 4-17)
21	BAAQMD List, p. 4-12	Mix of Uses	Yes	The Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers. The Project includes a mix of housing options within each Village, ranging from apartment homes close to the Town Center to single-family homes in lower-density areas. A full range of light industrial, business, and other commercial would yield a broad range of employment opportunities, from retail services to large corporate employers. (DRP 2017, p. 4-10) The Land Use Matrix permits a wide variety of uses in the following categories: residential, agricultural, public and semi-public, commercial, open space/recreation, manufacturing, light industrial, accessory, interim, and temporary. (*Id.,* pp. 4.17, 4-18)
22	CAPCOA List, p. B-18	Urban Mixed-Use: Development of projects predominantly characterized by properties on which various uses, such as office, commercial, institutional, and residential, are combined in a single building or on a single site in an integrated development project with functional	Yes	The Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers. The Project includes a mix of housing options within each Village, ranging from apartment homes close to the Town Center to single-family homes in lower-density areas. A full range of light industrial, business, and other commercial would yield a broad range of employment opportunities, from retail services to large corporate employers.

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
		interrelationships and a coherent physical design.		(DRP 2017, p. 4-10) The Land Use Matrix permits a wide variety of uses in the following categories: residential, agricultural, public and semi-public, commercial, open space/recreation, manufacturing, light industrial, accessory, interim, and temporary. (*Id.,* pp. 4.17, 4-18)
23	CAPCOA List, p. B-18	Suburban Mixed-Use: Have at least three of the following on site and/or offsite within one-quarter mile: Residential Development, Retail Development, Park, Open Space, or Office.	Yes	The Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers. The Project includes a mix of housing options within each Village, ranging from apartment homes close to the Town Center to single-family homes in lower-density areas. A full range of light industrial, business, and other commercial would yield a broad range of employment opportunities, from retail services to large corporate employers. (DRP 2017, Appendix 4.0-A., p. 4-10) The Land Use Matrix permits a wide variety of uses in the following categories: residential, agricultural, public and semi-public, commercial, open space/ recreation, manufacturing, light industrial, accessory, interim, and temporary. (*Id.,* Appendix 4.0-A., pp. 4-17, 4-18) An extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) would link residential, schools, shopping, and employment areas. (*Id.,* Appendix 4.0-A., p. 4-6) 100 percent of all residential development will be located within ¼ miles walking distance of a park, trailhead, club house or other public amenity, and an 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center. (*Id.,* Appendix 4.0-A., pp. 4-16, 4-17)
24	CAPCOA List, p. B-18	Other Mixed-Use: All residential units are within one-quarter mile of parks, schools or other civic uses.	Yes	An extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) would link residential, schools, shopping, and employment areas. (DRP 2017, p. 4-6.) 100 percent of all residential development will be located within ¼ miles walking distance of a park, trailhead, club house or other public amenity, and an 80 percent average, but not less than 50 percent of

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				all residential units will be located within ½ mile of a Village Core or the Town Center. (*Id.,* pp. 4-16, 4-17)
25	OPR List p. 18	Implement land use strategies to encourage jobs/housing proximity, promote transit-oriented development, and encourage high density development along transit corridors. Encourage compact, mixed-use projects, forming urban villages designed to maximize affordable housing and encourage walking, bicycling and the use of public transit systems	Yes	The location of the Project and the proposed residential and non-residential uses have been planned for a balance between the number of jobs available and the number of on-site housing units in an effort to encourage local trips. The Project would also provide an anticipated 23,675 permanent jobs. (DRP 2017, p. 3-19) The Project includes residential development to create a mixed-use community within the West EOA, consistent with the Land Use Policy Map in the AVAP. The Project would contribute to meeting the State-mandated Regional Housing Needs Assessment (RHNA) housing production goals for the unincorporated areas of the County and would be consistent with the regional effort to boost housing production to meet regional housing needs. (*Id.,* pp. 5.9-2, -3) The AVAP intends to provide a jobs/housing ratio of 1.3 jobs per dwelling unit in the unincorporated area of the Antelope Valley. The Economic Development Element of the AVAP sets a strategy of designating areas for light and heavy industrial uses near major transportation corridors and/or a concentration of skilled labor force in EOAs; The Project would implement this strategy, and would provide an estimated jobs/ housing ratio of 1.22, through the development of commercial and business park uses on the site, for use by high-tech manufacturing, transportation, and logistics companies. (*Id.,* p. 5.9-3) The Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers. The Project includes a mix of housing options within each Village, ranging from apartment homes close to the Town Center to single-family homes in lower-density areas. A full range of light industrial, business, and other commercial would yield a broad range of employment opportunities, from retail services to large corporate employers. (*Id.,* Appendix 4.0-A, p. 4-10) The Land Use Matrix permits a wide variety

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				of uses in the following categories: residential, agricultural, public and semi-public, commercial, open space/ recreation, manufacturing, light industrial, accessory, interim, and temporary. (*Id.,* pp. 4-17, 4-18) The Project's proposed circulation network and transit program provide and support multi-modal transit solutions and emerging transit technologies and services, including in perpetuity funding and governance via the Transit Management Association and Transportation Demand Management. See rows 146 through 209 for further discussion. The Project also includes affordable housing, as discussed in rows 1 through 5.

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
26	OPR List, p. 18	Encourage new developments to integrate housing, civic and retail amenities (jobs, schools, parks, shopping opportunities) to help reduce VMT resulting from discretionary automobile trips.	Yes	The Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers. The Project includes a mix of housing options within each Village, ranging from apartment homes close to the Town Center to single-family homes in lower-density areas. A full range of light industrial, business, and other commercial would yield a broad range of employment opportunities, from retail services to large corporate employers. (DRP 2017, p. 4-10) The Land Use Matrix permits a wide variety of uses in the following categories: residential, agricultural, public and semi-public, commercial, open space/ recreation, manufacturing, light industrial, accessory, interim, and temporary. (*Id.,* pp. 4-17, 4-18) An extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) would link residential, schools, shopping, and employment areas. (*Id.,* p. 4-6) 100 percent of all residential development will be located within ¼ miles walking distance of a park, trailhead, club house or other public amenity, and an 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center. (*Id.,* pp. 4-16, 4-17)
27	BAAQMD List, p. 4-17	100 percent increase in diversity of land use mix	Yes	The Project would include construction of a wide variety of diverse uses. The Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers. The Project includes a mix of housing options within each Village, ranging from apartment homes close to the Town Center to single-family homes in lower-density areas. A full range of light industrial, business, and other commercial would yield a broad range of employment opportunities, from retail services to large corporate employers. (DRP 2017, p. 4-10) The Land Use Matrix permits a wide variety of uses in the following categories: residential, agricultural, public and semi-public, commercial, open space/ recreation, manufacturing,

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				light industrial, accessory, interim, and temporary. (*Id.,* pp. 4-17, 4-18)
28	BAAQMD List, p. 4-17	Jobs housing balance	Yes	The location of the Project and the proposed residential and non-residential uses have been planned for a balance between the number of jobs available and the number of on-site housing units in an effort to encourage local trips. The Project would also provide an anticipated 23,675 permanent jobs, many of which are anticipated to be filled by future Project residents. (DRP 2017, p. 3-19) The Project includes residential development to create a mixed-use community within the West EOA, consistent with the Land Use Policy Map in the AVAP. The Project would contribute to meeting the State-mandated Regional Housing Needs Assessment (RHNA) housing production goals for the unincorporated areas of the County and would be consistent with the regional effort to boost housing production to meet regional housing needs. (*Id.,* pp. 5.9-2, -3) The AVAP intends to provide a jobs/housing ratio of 1.3 jobs per dwelling unit in the entire unincorporated area of the Antelope Valley. The Economic Development Element of the AVAP sets a strategy of designating areas for light and heavy industrial uses near major transportation corridors and/or a concentration of skilled labor force in EOAs; The Project would implement this strategy, and would provide an estimated jobs/ housing ratio of 1.22, through the development of commercial and business park uses on the site, for use by high-tech manufacturing, transportation, and logistics companies. (*Id.,* p. 5.9-3)
29	SLOAPCD List, p. 3-17	Improve job/housing balance opportunities within communities.	Yes	The location of the Project and the proposed residential and non-residential uses have been planned for a balance between the number of jobs available and the number of on-site housing units in an effort to encourage local trips. The Project would also provide an anticipated 23,675 permanent jobs, many of which are anticipated to be filled by future Project residents. (DRP 2017, p. 3-19) The Project includes residential development to create a mixed-use community within the West EOA, consistent with the Land Use Policy Map in the AVAP. The Project would contribute to meeting the

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				State-mandated Regional Housing Needs Assessment (RHNA) housing production goals for the unincorporated areas of the County and would be consistent with the regional effort to boost housing production to meet regional housing needs. (*Id.,* pp. 5.9-2, -3) The AVAP intends to provide a jobs/housing ratio of 1.3 jobs per dwelling unit in the unincorporated area of the Antelope Valley. The Economic Development Element of the AVAP sets a strategy of designating areas for light and heavy industrial uses near major transportation corridors and/or a concentration of skilled labor force in EOAs; The Project would implement this strategy, and would provide an estimated jobs/ housing ratio of 1.22, through the development of commercial and business park uses on the site, for use by high-tech manufacturing, transportation, and logistics companies. (*Id.,* p. 5.9-3)
30	SLOAPCD List, p. 3-19	Develop recreational facilities (e.g., parks, gym, pool, etc.) within one-quarter mile from site.	Yes	The proposed Project includes the construction of approximately 130,680 square feet or recreation/entertainment uses (clubhouse, farmers market, childcare facilities, health clubs) on approximately 75 acres. (DRP 2017, p. 4-6) Approximately 5,624 acres (approximately 45.6 percent) of the 12,323-acre Project site are proposed for Open Space for natural resources protection and greenways, and parks for active and passive recreational use. (*Ibid*.) 100 percent of all residential development will be located within ¼ miles walking distance of a park no less than 10,000 square feet, trailhead, club house or other public amenity. (*Id.,* pp. 4-16, 4-17; *Id.,* Appendix 4.0-A, p. 3-3) No less than 80 percent of Project dwelling units shall be located within ¼ mile walking distance of a public-accessible park space that is no less than 1 acre in size. (*Ibid.*)
31	SLOAPCD List, p. 3-20	Develop core commercial areas within ¼ to ½ miles of residential housing or industrial areas.	Yes	High-density residential areas are located adjacent to commercial centers and allowed within Mixed-Use Overlay zones, which permits residential uses within commercial centers. (DRP 2017, Appendix 4.0-A, p. 3-3) An 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center. (*Id.,* p. 4-17) The Town Center is located in Village 3 and is the "downtown" of the Project. (*Id.,* p. 4-16) Per the

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				Centennial Specific Plan, it will include a vibrant mix of uses, and ground floor commercial will activate the center, with a concentration of more dense housing to support retail and other commercial and service-oriented uses. (*Id.,* Appendix 4.0-A, p. 2-2) The Town Center is an activity center for each village, and they are designed to provide goods and services, recreational amenities, and mixed-use development is encouraged. (*Ibid*.) These core activity centers are pedestrian friendly and designed so that a mix of land uses are typically located within a quarter-mile radius. This ensures that even outside of mixed-use developments, pedestrians will have easy access to a wide range of goods and services. (*Ibid*.)
32	CAPCOA List, p. B-19	Infill Development: Project site is on a vacant infill site, redevelopment area, or brownfield or greyfield lot that is highly accessible to regional destinations, where the destinations rating of the development site (measured as the weighted average travel time to all other regional destinations) is improved by 100 percent when compared to an alternate greenfield site.	Yes	While the Project site is not an infill site, the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the county's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. Indeed, the South Coast Air Quality Management District (SCAQMD) has determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D.4-2) See response to Comment F.8-20 for further discussion.

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
33	AG List, p. 10	Ensure consistency with "smart growth" principles – mixed-use, infill, and higher density projects that provide alternatives to individual vehicle travel and promote the efficient delivery of services and goods. Meet recognized "smart growth" benchmarks. Educate the public about the benefits of well-designed, higher density development. Develop "brownfields" and other underused or defunct properties near existing public transportation and jobs.	Yes	The Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the county's Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. Indeed, the South Coast Air Quality Management District (SCAQMD) has determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D4-2) See response to Comment F.8-20 for further discussion. Consistent with Smart Growth principles, Medium- to Very High Density development is generally included in the central area of each Village, and the density of development progressively lowers with increased distances from core areas, called the Village Core, Town Center or Neighborhood Center. (DRP 2017, p. 4-16) The Town Center of the Project is located in Village 3 and is the "downtown" area of the Project; Villages 1, 2, 5, and 7 each have a Village Core, and Villages 6, 8, and 9 each have a Neighborhood Center. (*Ibid*.) An 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center. (*Id.,* pp. 4-16, 4-17) While the Project site is not a "brownfield" site, it is underused and has been determined to be appropriate for dense development to accommodate anticipated regional growth, as discussed above in this row. The Project site is in close proximity to the I-5 and is adjacent to the I-380.

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
34	CAPCOA List, p. B-21	Local Farmer's Market: Project shall dedicate space in a centralized, accessible location for a weekly farmers' market.	Yes	The Project will include a weekly Farmer's Market sponsored by the HOA or other entity selected by the Master Applicant/Developer. (DRP 2017, p. 5.21-84)
35	CAPCOA List, p. B-22	Community Gardens: Project shall dedicate space for community gardens.	Yes	Per PDF 5-1, the Project would accommodate 50 acres of small-scale agriculture and related uses, including, but limited to community gardens, farmers markets/produce stands, growing and sales of nursery stock, and commercial greenhouses. (DRP 2017, p. 5.5-12)
Building Orientation				
36	CAPCOA List, p. B-10	Off-Street Parking**:** Parking facilities are not adjacent to street frontage.	Yes	Non-motorized transportation planning elements are key parts of the Centennial Circulation Plan, and they include locating parking behind buildings to encourage walking in retail areas along street frontage. (DRP 2017, p. 4-31) The Centennial Specific Plan contains specific building orientation requirements for various land use types that also promote this for residential uses. To provide just two examples, single-family dwellings will orient the front door to the street and pedestrian access will be via street frontage or open space frontage, while vehicular access will be via street or alley access. (*Id.,* Appendix 3-A to Appendix 4.0-A, p. 5) In the single-family cottage homes, primary rooms and entrances are oriented towards the street, open space or a green court, while automobile access is from a rear lane/alley. (*Id.,* p. 6) Further, more dense housing provides underground or partial underground parking, which allows a more pedestrian-friendly environment.
37	SLOAPCD List, p. 3-17	Orient buildings toward streets with automobile parking in the rear to promote a pedestrian-friendly environment.	Yes	Non-motorized transportation planning elements are key parts of the Centennial Circulation Plan, and they include locating parking behind buildings to encourage walking in retail areas along street frontage. (DRP 2017, p. 4-31) The Centennial Specific Plan contains specific building orientation requirements for various land use types that also promote this for residential uses. To provide just two examples, single-family dwellings will orient the front door to the street and pedestrian access will be via street frontage or open space frontage, while vehicular access will be via street or alley access. (*Id.,*

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				Appendix 3-A to Appendix 4.0-A, p. 5) In the single-family cottage homes, primary rooms and entrances are oriented towards the street, open space or a green court, while automobile access is from a rear lane/alley. (*Id.,* p. 6) Further, more dense housing provides underground or partial underground parking, which allows a more pedestrian-friendly environment.
38	CAPCOA List, p. B-14	Orientation to Existing/Planned Transit, Bikeway, or Pedestrian Corridor: Project is oriented towards existing transit, bicycle, or pedestrian corridor. Setback distance between project and existing or planned adjacent uses is minimized or nonexistent. Setback distance between different buildings on project site is minimized. Setbacks between project buildings and planned or existing sidewalks are minimized. Buildings are oriented towards existing or planned street frontage. Primary entrances to buildings are located along planned or existing public street frontage. Project provides bicycle access to any planned bicycle corridor(s). Project provides pedestrian access to any planned pedestrian corridor(s).	Yes	The Project includes the development of nine Villages that will each contain a mix of land uses that enable residents to live near schools, shopping, neighborhood businesses and services, civic buildings, medical facilities, and employment centers, which will be accessible by to pedestrians and bike riders. See also rows 63 through 112, below, regarding bicycle and pedestrian infrastructure, access, and circulation. The Project will provide a pedestrian-oriented environment that reduces barriers such as walls, closed streets or landscaping. (DRP 2017 Appendix 2-A to Appendix 4.0-A, p. 6) The Project provides for minimum setbacks appropriate for the range of land use designations allowed. The Project would provide residential land uses at varied densities to meet the needs of different segments of the population, consistent with the AVAP. As identified in Draft EIR Table 4-1, Centennial Project Overview, the Project site would allow up to 19,333 dwelling units on 4,987 gross acres of land designated for residential uses. (*Id.,* p. 4-6) Of the 19,333 dwelling units, 5,175 are Medium Density, 2,055 High Density, and 300 Very High Density units. (*Id.,* Table 4-2, Centennial Specific Plan Statistical Table) Buildings would be oriented toward street frontages, as explained in row 37. The Project also includes an extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) that would link residential, schools, shopping, and employment areas. (*Id.,* p. 4-6) The Project provides for small- to medium-sized blocks that allow for shorter walking distances to retail, parks, schools, and other destinations, and streetscapes designed as public spaces to promote social interaction and physical

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				activity. (*Id.,* p. 4-31) All neighborhoods within a village connect to each other via network of trails. (*Id.,* p. 4-34)
39	SLOAPCD List, p. 3-18	Tract maps resulting in parcels of one-half acre or less shall orient at least 75 percent of all lot lines to create easy due south orientation of future structures.	Yes – Functional Equivalent Required	Energy conservation is an integral part of Centennial's overall orientation and design. Per MM 21-3, all commercial buildings shall be oriented for north-south panel orientation on buildings. (DRP 2017, p. 5.21-89) The Project site also lends itself naturally to an east-west street orientation, allowing the majority of buildings to provide a north-south orientation. (*Id.,* Appendix 4.0-A, pp. M-6, 1-8) With the goal of maximizing solar input, roads are oriented slightly counterclockwise of an east–west direction in harmony with site topography and in accordance with the Los Angeles County Solar Subdivision Guidelines for inland subdivisions. (*Id.,* Appendix 4.0-A, p. 3-62) Per the Green Development Program, most larger private sector employers are located along SR-138 and have an east-west elongation to facilitate the design of north–south oriented buildings that incorporate passive solar design. (Final EIR, Appendix 2-A to Appendix 4.0-A.Rev) The Project has also committed to meeting CALGreen Voluntary Measure requirements, which encourages the maximization of solar exposure. Further, Project commitments to provide solar panels for generation of on-site renewable energy exceed the suggested requirement to merely provide for building orientation that would allow efficient solar panel use. The Project commits to a minimum of 50 percent renewable energy generation, as provided in MM 21-1, with the following more specific relevant commitments included in the Centennial Green Development Program with regard to solar panels: • A minimum of 30 percent of all single-family detached and attached residential units at buildout shall have solar panel systems installed on roof areas or on top of other structures on the site (for example, patio covers or pergolas). Such systems shall be installed on roof areas facing within 30 degrees of true south.

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				• A minimum of 30 percent of all multi-family residential units at buildout shall have solar panel systems on roof areas. Such systems shall be installed on roof areas facing within 30 degrees of true south. • A minimum of 60 percent of buildings located within Business Park land use designations at buildout shall have solar panel systems installed on roof and parking areas. Such systems shall be installed on roof areas facing within 30 degrees of true south. • All residential buildings will be compatible with solar panel systems giving home buyers the option to include a photovoltaic array system as a home design system. • All commercial and residential structures include passive solar design techniques as a design guideline. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 15)
40	CAPCOA List, p. B-24	Solar Orientation**.** Project orients 75 percent or more of homes and/or buildings to face either north or south (within 30° of N/S). Building design includes roof overhangs that are sufficient to block the high summer sun, but not the lower winter sun, from penetrating south facing windows. Trees, other landscaping features and other buildings are sited in such a way as to maximize shade in the summer and maximize solar access to walls and windows in the winter.	Yes – Functional Equivalent Required	The Project maximizes solar orientation and provides solar panels, as discussed in row 39. The Project also takes advantage of natural cooling options by requiring the installation of operable windows designed to maximize natural ventilation by opening into prevailing west winds at inlets and away outlets, and installing operable clerestory windows for chimney effect cooling. Per the Centennial Green Development Program, the Project will incorporate passive solar design to reduce heat loads from glazing by strategically locating shade trees, trellises, awnings, exterior blinds, or shutters, to provide shading, and will increase air flow and reduce heat sinks at building entrances by, for example, including vegetation, water ponds, or fountains outside inlet openings to pre-cool air flow into buildings. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 20) It also incorporates deep overhangs. (*Id.,* Appendix 2-B to Appendix 4.0-A, p. 5)

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
41	SLOAPCD List, p. 3-18	Orient 75 percent or more of homes and/or buildings to be aligned north/south to reduce energy used to cool buildings in summer.	Yes – Functional Equivalent Required	The Project maximizes solar orientation and provides solar panels, as discussed in row 39. The Project also incorporates other measures to maximize natural cooling, as discussed in row 40.
42	SLOAPCD List, p. 3-17	For projects adjacent to high-volume roadways or railroad idling zones, design project to include effective buffer zone between the source and the receptor.	Yes	Per PDF 11-6, the Project prohibits residences, schools, day care centers or other land uses involving public congregation from being built within 150 feet of the near edge of the SR-138 traffic lanes. This requirement would ensure that risk of exposure to diesel particular matter is less than what is allowed by the AVAQMD and SCAQMD guidelines. (DRP 2017, p. 5.11-31) This requirement has been incorporated into MM 11-10. (*Id.,* p. 5.11-82) Moreover, MM 11-11 requires that, prior to approval of any tract map that includes a sensitive receptor located within 500 feet of SR-130 or a high-volume roadway, the Project Applicant/Developer must provide the Air Pollution Control District with jurisdiction over the mapped area a dispersion analysis to calculate the health risks from the relevant roadway. If the analysis concludes that any sensitive receptor exposure would equal or exceed 20 in 1 million for cancer risk or 1.0 for non-cancer indices, then the Project Developer/Applicant must submit a Toxic Air Contaminant (TAC) Emission Reduction Plan to the applicable air district for review and concurrence. Following review and concurrence by the applicable air district, a copy of the TAC Emission Reduction Plan confirming that no sensitive receptor on the Project site will be exposed to TAC risks in excess of applicable district thresholds must be provided to the County before County approval of the tentative map. In the TAC Emission Reduction Plan, TAC exposure reduction measures must be implemented to assure that no sensitive receptors are exposed to TAC-related health impacts that equal or exceed applicable district TAC thresholds, which measures may include, but are not limited to, setbacks, vegetative barriers, heating, ventilations and air conditioning (HVAC) system filtration technologies, etc., and shall be required as a condition of map approval and/or required as a condition prior to issuance of a building permit approval for future sensitive use(s) included in the tentative tract map. These

TABLE 1: LAND USE PLANNING & SITING MEASURES

Row	Source	Measure	Included	Response
				requirements would ensure that risk of exposure to TACs, including diesel particular matter, is less than what is allowed by the AVAQMD and SCAQMD guidelines. (*Id.,* p. 5.11-31)
43	SLOAPCD List, p. 3-17	For projects adjacent to high-volume roadways, plant vegetation between receptor and roadway.	Yes	The Centennial Specific Plan includes a comprehensive Landscape Plan to ensure that the community is developed with a new, water wise regionally appropriate landscape. The Landscape Plan includes detailed streetscape programming to ensure vegetation planting along all high-volume roadways. (DRP 2017, Appendix 4.0-A, pp. 3-37 to 3-41). Please also note the requirements of MMs 11-10 and 11-1, as described above in row 42.

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
44	SJVAPCD List, p. 3	Regulation VIII Control Measures for Construction Emissions of PM-10	Yes - Functional Equivalent Required	SVJAPCD Regulation VIII Control Measures and BAAQMD Rules are inapplicable to the proposed Project because it is located in the jurisdictions of the AVAQMD and SCAQMD, and is instead subject to their rules. However, the AVAQMD and SCAQMD Rules and the Project's PDFs and MMs contain identical and/or functionally equivalent requirements to which the Project is subject, and which will ensure achievement of the type of emissions reductions that would be achieved through implementation of suggested measures. See rows 45 through 53, below, for more details.
45	SJVAPCD List, p. 4	Enhanced Control Measures for Construction Emissions of PM-10: 1) Limit traffic speeds on unpaved roads to 15 mph; 2) Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent. 3) Install wheel washers for all exiting trucks, or wash off all trucks and equipment leaving the site; 4) Install wind breaks at windward side(s) of construction areas; 5) Suspend excavation and grading activity when winds exceed 20 mph; and 6) Limit area subject to excavation, grading, and other construction activity at any one time.	Yes - Functional Equivalent Required	The Project Applicant/Developer is required to implement dust-control measures as prescribed in AVAQMD Rule 403, Fugitive Dust, and SCAQMD Rule 403, Fugitive Dust. AVAQMD Rule 403 and SCAQMD Rule 403 require that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. Two options are presented in SCAQMD Rule 403: monitoring of particulate concentrations or active control. The exact method would be determined at the time of the preparation of the Dust Control Plan. Monitoring involves a sampling network around the Project site with no additional control measures unless specified concentrations are exceeded. The active control option does not require any monitoring, but requires that a list of measures be implemented starting with the first day of construction. Basic measures include pre-watering of grading sites, watering during grading, and watering or chemical treatment of stockpiles. Compliance with these rules will result in reducing short-term particulate pollutant emissions. SCAQMD Rule 403 also requires that "Large Operations" implement additional measures. A Large Operation is defined as "any active operations on a property that contain 50 or more acres of disturbed surface area or any earth-moving operation with a daily earth-moving or throughput volume of 3,850 cubic meters (5,000 cubic yards) or more 3 times during the most recent 365 day period" (SCAQMD 1976b). Grading of the Project would be considered a Large Project under Rule 403. Therefore, the Project shall be required to implement the applicable actions

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
				specified in Table 2 of the Rule, which is included in Draft EIR Appendix 5.11-D. Any active operation with a disturbed surface area of 5 or more acres or with a daily import or export of 100 cubic yards or more of bulk materials must utilize at least one of the measures listed in Table 3 of SCAQMD Rule 403 at each vehicle egress from the site to a paved public road. Rule 403 measures include regular watering of active grading areas and unpaved roads, limiting vehicle speeds on unpaved surfaces, stabilizing stockpiled earth, and curtailing grading operations during high wind conditions. (DRP 2017, pp. 5.11-41, -42) Further, SCAQMD Rule 403 requires that the Project not "allow track-out to extend 25 feet or more in cumulative length from the point of origin from an active operation" (SCAQMD 1976b). All track-out from an active operation is required to be removed at the conclusion of each workday or evening shift. See also the new MM 3-11 added in this Final EIR, which requires the Project Applicant/Developer to be responsible for creating and regularly updating a website on the proposed Project internet that provides public information regarding dust-generating activities and Valley Fever risk, throughout the Project construction period. The Project Applicant/Developer must also send a one-time notice to surrounding communities and schools of the website's existence and contents. With regard to the specifically suggested measures in this row: 1. This speed restriction for staging areas is incorporated in to the Best Available Control Measures in Table 1 of the SCAQMD Rule 403, which is applicable to all construction activity. (SCAQMD Rule 403, p. 403-16) The Project shall be required to implement the applicable actions specified in Table 2 of SCAQMD Rule 403, as discussed above in this row. This speed restriction measure is included as a potential measure in Table 2. (SCAQMD Rule 403, p. 403-23) 2-5. A SWPPP must be prepared and implemented that includes BMPS that meet or exceed state Construction General Permit requirements. (DRP 2017, p. 5.4-53) Construction period BMPs may include erosion controls that prevent erosion; sediment controls that trap sediment

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
				carried in runoff; or BMPs that control other potential construction-related pollutants. (*Ibid*.) Types of BMPs that would implemented during construction of the Project and would meet the standards to comply with the Construction General Permit relevantly include: • Physically stabilizing the area through hydraulic mulch, soil binders, straw mulch, bonded fiber matrices, and erosion-control blankets (*Ibid*.); • Protecting perimeters through silt fences, fiber rolls, gravel bag berms, gravel bag barriers, sand bag barriers, and compost stocks to prevent discharges (*Ibid*.); • Containing and securely protecting stockpiled materials from wind at all times, unless actively being used, and controlling wind-erosion through the application of water or other dust palliatives as necessary to prevent and alleviate dust nuisance (*Ibid*.); • Reducing off-site tracking through stabilized construction entrances/exits, construction road stabilization, and entrance/exit tire wash. (*Id.,* p. 5.4-54) 6. The Project will require construction contractors to delineate and flag the smallest site disturbance area possible in areas not subject to mass grading. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 17)
46	BAAQMD List, p. 8-3	<u>Basic Construction Mitigation Measures Recommended for All Proposed Projects:</u> 1) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.	Yes, and/or Functional Equivalent Required	The Project must comply with dust control measures required by SCAQMD and AVAQMD, as discussed further in rows 44 and 45, above. With regard to the specifically suggested measures in this row: 1. Best Available Control Technologies in Table 1 of the SCAQMD Rule 403 Table 1 (applicability discussed in row 45) include mixing backfill soil with water prior to moving, applying water in sufficient quantities to prevent generation of dust plumes during clearing and grading and to all disturbed soil; pre-watering materials prior to loading into crushing equipment; pre-watering soils prior to cut and fill activities; pre-application of water to the depth of proposed cuts

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
		2) All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. 4) All vehicle speeds on unpaved roads shall be limited to 15 mph. 5) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. 6) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. 7) All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall		during earth-moving activities and reapplication of water as necessary to maintain soils in a damp condition and to ensure that visible emissions do not exceed 100 feet in any direction. (SCAQMD Rule 403, pp. 403-13, -14) A SWPPP must also be prepared and implemented that includes BMPS that meet or exceed state Construction General Permit requirements, as discussed in row 45. Types of BMPs that would be implemented during construction of the Project include controlling wind-erosion through the application of water or other dust palliatives as necessary to prevent and alleviate dust nuisance. (DRP 2017, p. 5.4-53) 2. Best Available Control Technologies in Table 1 of the SCAQMD Rule 403 Table 1 (applicability discussed in row 45) include using tarps or other suitable enclosures on haul trucks. (SCAQMD Rule 403, p. 403-15) 3. As discussed in row 45, SCAQMD Rule 403 requires that the Project not "allow track-out to extend 25 feet or more in cumulative length from the point of origin from an active operation" (SCAQMD 1976b). All track-out from an active operation is required to be removed at the conclusion of each workday or evening shift. Best Available Control Technologies in Table 1 of the SCAQMD Rule 403 Table 1 (applicability discussed in row 45) include compliance with track-out prevention/mitigation measures and use of water spray to clear forms; or use sweeping and water spray to clear forms; or use vacuum system to clear forms. (SCAQMD Rule 403, pp. 403-13, -15) 4. This speed restriction for staging areas is incorporated in to the Best Available Control Measures in Table 1 of the SCAQMD Rule 403, which is applicable to all construction activity. (SCAQMD Rule 403, p. 403-16) The Project shall be required to implement the applicable actions specified in Table 2 of SCAQMD Rule 403, as discussed above in row 45. This speed restriction measure is included as a potential measure in Table 2. (SCAQMD Rule 403, p. 403-23) 5. Best Available Control Technologies in Table 1 of the SCAQMD Rule 403 Table 1 (applicability discussed in row 45) include applying

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
		be checked by a certified visible emissions evaluator. 8) Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.		gravel/paving to roadways as soon as possible. (SCAQMD Rule 403, p. 403-17) 6. Project MMs 11-2 and 21-4 require the limitation of construction equipment idling time to 3 minutes. (DRP 2017, pp. 5.11-79, 5.21-89) As noted in the AG List, under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds must also already comply with a prohibition from idling for more than 5 minutes at any location. (AG List, p. 16) 7. MM 11-2 requires that all construction contractors shall ensure construction equipment is properly maintained to the manufacturer's standards. (DRP 2017, p. 5.11-79) A copy of each unit's certified tier specification, BACT documentation, and CARB or District operating permit shall be provided to the County at the first occurrence of mobilization of each applicable unit of equipment. (*Ibid*.) 8. Please see the new MM 3-11 added in this Final EIR, which requires the Project Applicant/Developer to be responsible for creating and regularly updating a website on the proposed Project internet that provides public information regarding dust-generating activities and Valley Fever risk, throughout the Project construction period. The Project Applicant/Developer must also send a one-time notice to surrounding communities and schools of the website's existence and contents. Per MM 3-1, the Project Applicant/Developer "shall employ a Dust-Control Supervisor who will be on the site within 30 minutes of the start of work taking place each morning; will have the authority to expeditiously employ sufficient dust mitigation measures to ensure compliance with all Antelope Valley Air Quality Management District (AVAQMD) Rule 403 and South Coast Air Quality Management District (SCAQMD) Rule 403 requirements; and will have completed the SCAQMD Fugitive Dust Control Class and has been issued a valid Certificate of Completion for the class. Contact information for the Project's Dust Control Supervisor shall be posted on-site to ensure that the public has a means of providing complaints regarding fugitive dust. The Dust Control Supervisor shall be responsible for tracking complaints, conducting corrective action, as necessary, and for

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
				maintaining an up-to-date log of complaints and responses for periodic County review." (*Id.,* p. 5.3-26)
47	BAAQMD List, p. 8-4	Additional Construction Mitigation Measures Recommended for Projects with Construction Emissions Above the Threshold: 1) All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe. 2) All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. 3) Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity. 4) Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established. 5) The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall	Yes, and/or Functional Equivalent Required	The Project must comply with equivalent dust control measures required by SCAQMD and AVAQMD, as discussed further in rows 44 and 45, above. With regard to the specifically suggested measures in this row: 1. The Project shall be required to implement the applicable actions specified in Table 2 of SCAQMD Rule 403, as discussed above in row 45. Measures for earth-moving include maintaining soil moisture content at a minimum of 12 percent. (SCAQMD Rule 403, p. 403-19) 2, 6, 7, 8. A SWPPP must be prepared and implemented that includes BMPS that meet or exceed state Construction General Permit requirements. (DRP 2017, p. 5.4-53) Construction period BMPs may include erosion controls that prevent erosion; sediment controls that trap sediment carried in runoff; or BMPs that control other potential construction-related pollutants. (*Ibid*.) Types of BMPs that would implemented during construction of the Project and would meet the standards to comply with the Construction General Permit relevantly include: • Physically stabilizing the area through hydraulic mulch, soil binders, straw mulch, bonded fiber matrices, and erosion-control blankets (*Ibid*.); • Protecting perimeters through silt fences, fiber rolls, gravel bag berms, gravel bag barriers, sand bag barriers, and compost stocks to prevent discharges (*Ibid*.); • Containing and securely protecting stockpiled materials from wind at all times, unless actively being used, and controlling wind-erosion through the application of water or other dust palliatives as necessary to prevent and alleviate dust nuisance (*Ibid*.);

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
		be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time 6) All trucks and equipment, including their tires, shall be washed off prior to leaving the site. 7) Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12 inch compacted layer of wood chips, mulch, or gravel. 8) Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent. 9) Minimizing the idling time of diesel powered construction equipment to two minutes. 10) The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NOX reduction and 45 percent PM reduction compared to the most recent ARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels,		• Reducing off-site tracking through stabilized construction entrances/exits, construction road stabilization, and entrance/exit tire wash. (*Id.,* p. 5.4-54) 3. Best Available Control Technologies in Table 1 of the SCAQMD Rule 403 Table 1 (applicability discussed in row 45) include upwind fencing to prevent material movement on site. (SCAQMD Rule 403, p. 403-14) For screening, it also includes a measure to "install wind barrier with a porosity of no more than 50 percent upwind of screen to the height of the drop point." (*Id.,* p. 403-16) 4. Best Available Control Technologies in Table 1 of the SCAQMD Rule 403 Table 1 (applicability discussed in row 45) include maintaining live perennial vegetation where possible during clearing and grubbing. (SCAQMD Rule 403-13) Table 2 of SCAQMD Rule 403 includes a measure for inactive disturbed surface areas, to establish a vegetative ground cover within 21 days after active operations have ceased, of sufficient density to expose less than 30 percent of unstabilized ground within 90 days of planting and at all times thereafter. (*Id.,* p. 403-20) 5. Project construction will be phased over an approximately 20-year buildout period. The Project will require construction contractors to delineate and flag the smallest site disturbance area possible in areas not subject to mass grading. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 17) 9. Project MMs 11-2 and 21-4 require the limitation of construction equipment idling time to 3 minutes, which exceeds state requirements. (*Id.,* pp. 5.11-79, 5.21-89) As noted in the AG List, under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds must also already comply with a prohibition from idling for more than 5 minutes at any location. (AG List, p. 16) 10, 12, 13. Per MM 11-2 (as revised in this Final EIR), the Project requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
		engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available. 11) Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings). 12) Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM. 13) Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy duty diesel engines.		Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, and any emissions-control device used by a contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If tier 4 Final equipment is not available, the Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach – these policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). (DRP 2017, pp. 5.11-78, -79) 11. The Project must comply with state pollutant control requirements for finish materials. For example, materials including adhesives, sealants, caulks, paints and coatings, carpet systems, and composite wood products must meet requirements in CALGreen to ensure pollutant control. (CALGreen Section 5.504.4.) The Project Applicant/Developer is also required to use architectural coatings compliant with AVAQMD Rule 1113 and SCAQMD Rule 1113, which limit the VOC content of architectural coatings. Based on these rules, it was assumed that the average VOC content of architectural coatings would not exceed 50 grams per liter (g/L) for all interior surfaces, 100 g/L for residential exterior surfaces, and 150 g/L for non-residential exterior surfaces. It was also assumed that 50 percent of the non-residential exterior surface would be painted. (DRP 2017, p. 5.11-43) Further, this Final EIR revises MM 11-2 to add an additional bullet point requiring construction contractors to use Super-Compliant Architectural/Industrial (AIM) Coatings that are

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
				commercially available and certified to meet the applicable requirements of AVAQMD Rule 1113 and SCAQMD Rule 1113.
48	SJVAPCD List, p. 4	For heavy duty construction equipment (scrapers, graders, trenchers, earth movers, etc.): 1. Minimize idling time (e.g., 5 minute maximum) 2. Limit the hours of operation of heavy duty equipment and/or the amount of equipment in use 3. Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak-hour of vehicular traffic on adjacent roadways 4. Implement activity management (e.g. rescheduling activities to reduce short-term impacts)	Yes, and/or Functional Equivalent Required	1. Project MMs 11-2 and 21-4 require the limitation of construction equipment idling time to 3 minutes, which exceeds state requirements. (DRP 2017, pp. 5.11-79, 5.21-89) As noted in the AG List, under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds must also already comply with a prohibition from idling for more than 5 minutes at any location. (AG List, p. 16) 2-4. The Project will require construction contractors to delineate and flag the smallest site disturbance area possible in areas not subject to mass grading. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 17) To avoid traffic disruption during the construction phases of each development MM 10-5 requires that temporary traffic controls in accordance with the Green and Graybook and a Transportation Management Plan be prepared and implemented during Project construction activities. (*Id.,* p. 5.10-53) The Traffic Management Plans shall identify the following: construction haul routes; duration and location of lane closures; location of parking for the public and construction workers during construction phases; use of flag persons; and any pedestrian-related impacts to sidewalks and intersection crossings. The Traffic Management Plan shall be implemented during all stages of Project construction that generate traffic impacts. (*Id.,* p. 5.10-145) See also rows 45 through 47 regarding dust control measures.
49	AG List, p. 16	Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles.	Yes	Under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds must also already comply with a prohibition from idling for more than 5 minutes at any location. (AG List, p. 16) Project MMs 11-2 and 21-4 require the limitation of construction equipment idling time to 3 minutes, which exceeds state requirements. (DRP 2017, pp. 5.11-79, 5.21-89)

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
50	2008 OPR List p.18	Limit idling time for commercial vehicles, including delivery and construction vehicles.	Yes	Under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds must also already comply with a prohibition from idling for more than 5 minutes at any location. (AG List, p. 16) Project MMs 11-2 and 21-4 require the limitation of construction equipment idling time to 3 minutes, which exceeds state requirements. (DRP 2017, pp. 5.11-79, 5.21-89)
51	SLOAPCD List, p. 3-17	Use of an APCD-approved suppressant on private unpaved roads leading to the site, unpaved driveways and parking areas; applied at a rate and frequency that ensures compliance with APCD Rule 401, visible emissions and ensures offsite nuisance impacts do not occur.	Yes, and/or Functional Equivalent Required	The Project is not subject to SLOAPCD Rules, but would implement equivalent AVAQMD and SCAQMD Rules, and the Project's PDFs and MMs contain identical and/or functionally equivalent requirements to which the Project is subject, as discussed above in row 44. The Project shall be required to implement the applicable actions specified in Table 2 of SCAQMD Rule 403, as discussed above in row 45. For unpaved roads, application of a chemical stabilizer in a sufficient quantity and frequency to maintain a stabilized surface is included as a potential measure in Table 2. (SCAQMD Rule 403, p. 403-23) This measure is also applicable to open storage piles. (*Ibid*.)
52	CAPCOA List, pp. B-31, B-32	ARB-Certified Diesel Construction Equipment: Use ARB-certified diesel construction equipment. Increases CO2 emissions when trapped CO and carbon particles are oxidized (Catalyst Products 2007, ETC 2007).	Yes	Per MM 11-2 (as revised in this Final EIR), the Project requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, and any emissions-control device used by a contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If tier 4 Final equipment is not available, the Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach – these policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
				Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). (DRP 2017, pp. 5.11-78, -79) MM 11-2 also requires the use of 2010 or newer diesel haul trucks. (*Id.,* p. 5.11-79)
53	SJVAPCD List, p. 15-16	Use of a "Construction Clean Fleet" that will reduce construction emissions by 20 percent for oxides of nitrogen (NOx) and 45 percent for particulate matter of 10 microns or less in size (PM10) from the statewide average as estimated by the Air Resource Board (ARB). A Construction Clean Fleet for a project includes all the pieces of construction equipment that are greater than 50 horse power and generate emissions from the use of an internal combustion engines related to construction activity.	Yes – Functional Equivalent Required	Per MM 11-2 (as revised in this Final EIR), the Project requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, and any emissions-control device used by a contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If tier 4 Final equipment is not available, the Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach – these policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). (DRP 2017, pp. 5.11-78, -79) MM 11-2 also requires the use of 2010 or newer diesel haul trucks. (*Id.,* p. 5.11-79)
54	SJVAPCD List, p. 4	For heavy duty construction equipment (scrapers, graders, trenchers, earth movers, etc.): Use of alternative fueled or catalyst equipped diesel construction equipment.	Yes – Functional Equivalent Required	As discussed above in row 47, Per MM 11-2 (as revised in this Final EIR), the Project requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
		Or Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set)		devices certified by CARB or the USEPA, and any emissions-control device used by a contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If tier 4 Final equipment is not available, the Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach – these policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). (DRP 2017, pp. 5.11-78, -79) Construction equipment used by the Project is also subject to CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation.
55	CAPCOA List, p. B-32	Alternative Fuel Construction Equipment: Use alternative fuel types for construction equipment.	Yes – Functional Equivalent Required	As discussed above in row 47, Per MM 11-2 (as revised in this Final EIR), the Project requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, and any emissions-control device used by a contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If tier 4 Final equipment is not available, the Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach – these policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
				Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). (DRP 2017, pp. 5.11-78, -79) Construction equipment used by the Project is also subject to CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation.
56	SMAQMD List, p. 11	Use Low VOC Cleaning Supplies. Project utilizes only low VOC cleaning supplies in perpetuity.	Yes	This is already legally required. CARB limits VOCs for numerous product types, including cleaning products. See Final Regulation for Reducing Emissions from Consumer Products, Article 2, Subchapter 8.5 available at: https://www.arb.ca.gov/consprod/regs/2015/article_2_final_1-22-15.pdf.
57	BAAQMD List, p. 4-14	Low VOC architectural coatings	Yes	The Project must comply with state pollutant control requirements for finish materials. For example, materials including adhesives, sealants, caulks, paints and coatings, carpet systems, and composite wood products must meet requirements in CALGreen to ensure pollutant control. (CALGreen Section 5.504.4.) The Project Applicant/Developer is also required to use architectural coatings compliant with AVAQMD Rule 1113 and SCAQMD Rule 1113, which limit the VOC content of architectural coatings. Based on these rules, it was assumed that the average VOC content of architectural coatings would not exceed 50 grams per liter (g/L) for all interior surfaces, 100 g/L for residential exterior surfaces, and 150 g/L for non-residential exterior surfaces. It was also assumed that 50 percent of the non-residential exterior surface would be painted. (DRP 2017, p. 5.11-43) Further, this Final EIR revises MM 11-2 to require construction contractors to use Super-Compliant Architectural/Industrial (AIM) Coatings that are commercially available and certified to meet the applicable requirements of AVAQMD Rule 1113 and SCAQMD Rule 1113.

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
58	SMAQMD List, p. 11	Use low VOC Paint. Project utilizes low VOC Paint in perpetuity.	Yes	The Project must comply with state pollutant control requirements for finish materials. For example, materials including adhesives, sealants, caulks, paints and coatings, carpet systems, and composite wood products must meet requirements in CALGreen to ensure pollutant control. (CALGreen Section 5.504.4.) The Project Applicant/Developer is also required to use architectural coatings compliant with AVAQMD Rule 1113 and SCAQMD Rule 1113, which limit the VOC content of architectural coatings. Based on these rules, it was assumed that the average VOC content of architectural coatings would not exceed 50 grams per liter (g/L) for all interior surfaces, 100 g/L for residential exterior surfaces, and 150 g/L for non-residential exterior surfaces. It was also assumed that 50 percent of the non-residential exterior surface would be painted. (DRP 2017, p. 5.11-43) Further, this Final EIR revises MM 11-2 to require construction contractors to use Super-Compliant Architectural/Industrial (AIM) Coatings that are commercially available and certified to meet the applicable requirements of AVAQMD Rule 1113 and SCAQMD Rule 1113.
59	CAPCOA List, p. B-32	Local Building Materials**:** Use locally made building materials for construction of the project and associated infrastructure.	Yes	The Centennial Green Development Program's Green Building component requires all residential and nonresidential development to comply with CALGreen Code Mandatory Measures, Required Measures for the voluntary 2016 CALGreen Tier 1 Measures, and to comply with the Los Angeles Green Building Ordinances Additional measures to further improve material conservation and efficiency, and assure healthy building materials and designs. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 4) The Green Development Program also has a requirement for using recycled materials wherever possible for Project streets, sidewalks, and parking lots. (*Id.,* p. 10) Additionally, the following mitigation measure is hereby added as MM 21-21: **MM 21-21** The Project Applicant/Developer shall require contractors to use locally available and recycled building materials, provided such materials meet

TABLE 2: CONSTRUCTION PHASE MITIGATION MEASURES

Row	Source	Measure	Included	Response
				all applicable Building Code and other requirements, and are readily available and comparably priced to assure that such materials do not increase the cost and decrease the affordability of housing or community infrastructure.
60	SLOAPCD List, p. 3-18	Utilize green building materials (materials which are resource efficient, recycled, and sustainable) available locally if possible.	Yes	The Centennial Green Development Program's Green Building component requires all residential and nonresidential development to comply with CALGreen Code Mandatory Measures, Required Measures for the voluntary 2016 CALGreen Tier 1 Measures, and to comply with the Los Angeles Green Building Ordinances Additional measures to further improve material conservation and efficiency, and assure healthy building materials and designs. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 4). Additionally, see the new MM 21-21 set forth in row 59.
61	CAPCOA List, p. B-29	Green Building Materials**.** Project uses materials which are resource efficient, recycled, with long life cycles and manufactured in an environmentally friendly way.	Yes	The Centennial Green Development Program's Green Building component requires all residential and nonresidential development to comply with CALGreen Code Mandatory Measures, Required Measures for the voluntary 2016 CALGreen Tier 1 Measures, and to comply with the Los Angeles Green Building Ordinances Additional measures to further improve material conservation and efficiency, and assure healthy building materials and designs. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 4) Additionally, see the new MM 21-21 set forth in row 59.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
Mobility Design; Pedestrian and Bicycle Infrastructure				
62	SLOAPCD List, p. 3-17	Pave and maintain the roads and parking areas.	Yes	The Project will use durable paving materials that will be determined upon consideration of aggregates, asphalt materials, cementitious materials, recycled materials, and other roadway materials that are commonly used in pavement construction in order to assess from a lifecycle perspective the role they play in contributing to the sustainability of the Project's pavement system; "Cool" pavements will be used to reduce heat island effects. (DRP 2017, p. 5.21-79)
63	SLOAPCDList, p. 3-18	Implement on-site circulation design elements in parking lots to reduce vehicle queuing and improve the pedestrian environment.	Yes	The Project does incorporate features to reduce vehicle queuing and improve the pedestrian environment. Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DRP 2017, Appendix 4.0-A, p. 3-2) With regard to parking lot and driveway design standards specifically, the following mitigation measure is hereby added as MM 21-22: **MM 21-22** The Project parking lots shall be designed to reduce vehicle queuing and improve pedestrian safety. Parking lot access designs shall include self-enforcement features for reducing the speeds on driveways, such as speed bumps or curved driveways. The parking lots shall include clearly marked pedestrian pathways connecting building entrances to parking, sidewalk, and transit drop-off/pick-up locations.
64	SLOAPCD List, p. 3-17	Driveway design standards (e.g., speed bumps, curved driveway) for self-enforcing of reduced speed limits for unpaved driveways.	Yes	The Project does incorporate features to reduce vehicle queuing and improve the pedestrian environment, as discussed in row 63. With regard to parking lots and driveway design standards specifically, see MM 21-22 as set forth in row 63.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
65	SJVAPCD List, p. 13	Provide a parking lot design that includes clearly marked and shaded pedestrian pathways between transit facilities and building entrances.	Yes	This requirement has been incorporated into the Project in MM 21-22 – see row 63.
66	CAPCOA List, p. B-9	Pedestrian Pathway Through Parking**:** Provide a parking lot design that includes clearly marked and shaded pedestrian pathways between transit facilities and building entrances.	Yes	This requirement has been incorporated into the Project in MM 21-22 – see row 63.
67	SJVAPCD List, p. 13	Provide pedestrian access between bus service and major transportation points and to destination points within the project.	Yes	Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DRP 2017, Appendix 4.0-A, p. 3-2) See also MM 21-22 in row 63.
68	BAAQMD List, p. 4-17	100 percent increase in design (i.e., presence of design guidelines for transit oriented development, complete streets standards)	Yes	Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DRP 2017, Appendix 4.0-A, p. 3-2) Pedestrian amenities throughout the community include specific allocations of land to greenway and community trails (described in the Trails Plan, Specific Plan Section 3.11.7) so that pedestrians can circulate throughout the community safely and efficiently. The pedestrian system is designed to avoid roadway crossings to the extent feasible. Consistent with complete streets planning, sidewalks are planned for all public streets. (*Id.,* Appendix 4.0-A, p. 3-6) The Project includes an extensive network of sidewalks, greenway trails, and community trails that link residential, schools, shopping, and

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				employment areas. (*Id.,* p. 3-3) It also includes two underpasses and one overpass over SR-138 to facilitate access to employment centers. (*Ibid*.) Per the Specific Plan, all neighborhoods within each village shall connect to each other via a network of local streets and trails. The Project will locate 50 percent or more of all residential units and non-residential buildings in a grid pattern block structure while considering environmental or other land form constrains. In areas, outside of the Village Cores and Town Center, block size shall be no greater than 1,980 feet (1/3 mile) in perimeter with an intersection or trail connection every 800 feet. Within a ¼ mile walking distance of the Village Cores and the Town Center (including inside the Center/Cores), and within the Centennial Commerce District, block size shall be no greater than an average of 1,320 to 1,600 feet (approximately 1/4 mile) in perimeter and where feasible with no more than 500 feet of spacing distance between intersections. Multi-family residential and commercial/mixed uses in the Town Center or a Village Core shall maximize the use of public alleys or private lanes located in the rear of the lots or buildings, and principally used for parking access, loading, deliveries, trash, and utilities. Buildings shall front the street with limited to no curb cuts, allowing direct pedestrian access from building entrances to the public sidewalk. Residential blocks in these areas should utilize alleys or private rear lanes for parking access and other services states above. (*Id.,* Appendix 4.0-A, p. M-9) Per the Specific Plan, Project traffic-calming measures include narrower street widths to slow automotive traffic, roundabouts, speed tables, bulb-outs at intersections to restrict roadway width and narrow the pedestrians' crossing distance, raised intersections or crosswalks, chokers that narrow a roadway at mid-block, chicanes or lateral shifts that narrow street widths and also providing on-street parking or landscaping on alternate sides of the street, textured pavement and cul-de-sacs. (*Id.,* Appendix 4.0A, Mobility Plan, p. 4) Representative examples of traffic calming design measures and cul-de-sac designs are provided in Chapter 3 of the Specific Plan. All neighborhoods within each village shall connect to each other via a network of local streets

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				and trails. (*Ibid*.) Sidewalks are planned for both sides of all public streets. (*Id.,* p. 8) In addition to all of the above, the Project promotes travel by foot or on bicycle by providing extensive pedestrian and bicycle infrastructure, a transit program and incentives to use transit, and charging facilities for electric vehicles, as discussed throughout this response
69	CAPCOA List, pp. B-15, B-16	Street Grid**:** Multiple and direct street routing (grid style). This measure only applies to projects with an internal CF >/= 0.80, and average of one-quarter mile or less between external connections along perimeter of project. [CF= # of intersections /(# of cul-de-sacs + intersections)]. Cul-de-sacs with bicycle/ pedestrian through access may be considered "complete intersections" when calculating the project's internal connectivity factor. External connections are bike/pedestrian pathways and access points, or streets with safe and convenient bicycle and pedestrian access that connect the project to adjacent streets, sidewalks, and uses. If project site is adjacent to undeveloped land; streets, pathways, access points, and right-of-ways that provide for future access to adjacent uses may count for up to 50 percent of the external connections. Block perimeter (the sum of the measurement of the length of all block sides) is limited to no more than 1,350 feet. Streets internal to the project should connect to streets external to the project whenever possible.	Yes – Functional Equivalent Required	Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DPR 2017, Appendix 4.0-A, p. 3-2) Residential, recreational, and commercial uses have been strategically located to provide superior access, multi-modal design, and ultimately to reduce the number of vehicles on the road. (*Id.,* p. 1-7) The metrics of the Centennial Specific Plan require 50 percent or more of all residential units and non-residential buildings to be sited in a grid pattern block structure that is considerate of environmental or other land form constraints. (*Id.,* p. 2-38) Consistent with the County of Los Angeles's Model Design Manual for Living Streets (2011), additional metrics establish the criteria for a grid pattern network and increase connectivity within these areas: • All neighborhoods within each village shall connect to each other via a network of local streets and trails. (*Ibid*.) • Locate 50 percent or more of all residential units and non-residential buildings in a grid pattern block structure while considering environmental or other land form constraints. In areas outside of the Village Cores and Town Center, block size shall be no greater than 1,980 feet (1/3 mile) in perimeter with an intersection or trail connection every 800 feet. (*Ibid*.)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				• Within a ¼ mile walking distance of the Village Cores and the Town Center (including inside the Center/Cores), and within the Centennial Commerce District, block size shall be no greater than an average of 1,320 to 1,600 feet (approximately 1/4 mile) in perimeter and where feasible with no more than 500 feet of spacing distance between intersections. (*Ibid*.) • Multi-family residential and commercial/mixed uses in the Town Center or a Village Core shall maximize the use of public alleys or private lanes located in the rear of the lots or buildings, and principally used for parking access, loading, deliveries, trash and utilities. Buildings shall front the street with limited to no curb cuts, allowing direct pedestrian access from building entrances to the public sidewalk. Residential blocks in these areas should utilize alleys or private rear lanes for parking access and other services stated above. (*Ibid*.) See also row 68.
70	BAAQMD List, p. 4-18	Complete streets (i.e., bike lanes and pedestrian sidewalks on both sides of streets, traffic calming features such as pedestrian bulb-outs, cross-walks, traffic circles, and elimination of physical and psychological barriers (e.g., sound walls and large arterial roadways, respectively).)	Yes	Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DRP 2017, Appendix 4.0-A, p. 3-2) The Project also incorporates features to reduce vehicle queuing and improve the pedestrian environment. Per the Specific Plan, Project traffic-calming measures include narrower street widths to slow automotive traffic, roundabouts, speed tables, bulb-outs at intersections to restrict roadway width and narrow the pedestrians' crossing distance, raised intersections or crosswalks, chokers that narrow a roadway at mid-block, chicanes or lateral shifts that narrow street widths and also providing on-street parking or landscaping on alternate sides of the street, textured pavement and cul-de-sacs. (*Id.,* Appendix 4.0A, Mobility Plan, p. 4) Representative examples of traffic calming design measures and cul-de-sac designs are provided in Chapter 3 of the Specific Plan. All neighborhoods within each village shall connect to each other via a

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				network of local streets and trails. (*Ibid*.) Sidewalks are planned for both sides of all public streets. (*Id.,* p. 8)
71	SJVAPCD List, p. 13	Project design uses models by the Local Government Commission (LGC) in the "'Smart Growth Guidebook," such as: street block patterns that form an interconnected grid, short block faces, numerous alleys and narrow streets.	Yes – Functional Equivalent Required	Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DRP 2017, Appendix 4.0-A, p. 3-2) The metrics of the Centennial Specific Plan require 50 percent or more of all residential units and non-residential buildings to be sited in a grid pattern block structure that is considerate of environmental or other land form constraints. (*Id.,* p. 2-38) Consistent with the County of Los Angeles's Model Design Manual for Living Streets (2011), additional metrics establish the criteria for a grid pattern network and increase connectivity, as set forth in row 69.
72	SLOAPCD List, p. 3-17	Incorporate traffic calming modifications to project roads, such as narrower streets, speed platforms, bulb-outs and intersection designs that reduce vehicles speeds and encourage pedestrian and bicycle travel.	Yes	Per the Specific Plan, Project traffic-calming measures include narrower street widths to slow automotive traffic, roundabouts, speed tables, bulb-outs at intersections to restrict roadway width and narrow the pedestrians' crossing distance, raised intersections or crosswalks, chokers that narrow a roadway at mid-block, chicanes or lateral shifts that narrow street widths and also providing on-street parking or landscaping on alternate sides of the street, textured pavement and cul-de-sacs. (DRP 2017, Appendix 4.0A, Mobility Plan, p. 4) Representative examples of traffic calming design measures and cul-de-sac designs are provided in Chapter 3 of the Specific Plan. All neighborhoods within each village shall connect to each other via a network of local streets and trails. (*Ibid*.) Sidewalks are planned for both sides of all public streets. (*Id.,* p. 8)
73	SMAQMD List, p. 9	Provide Traffic Calming Measures. Projects streets and intersections feature traffic calming features.	Yes	The Project incorporates traffic calming measures, as discussed in row 72.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
74	2008 OPR List, p. 18	Implement street improvements that are designed to relieve pressure on a region's most congested roadways and intersections.	Yes	Per MM 10-3, the Project Applicant/Developer shall seek to enter into a Traffic Mitigation Agreement with Caltrans and shall comply with its terms if approved and implemented; Compliance with the Traffic Mitigation Agreement constitutes compliance for mitigation of the Project's traffic impacts on the State highway system. (DRP 2017, p. 5.10-145) Per MM 10-4, the Project Applicant/Developer will also work with the County and/or Caltrans to establish a Traffic Mitigation Fee Program or assessment district, or other equivalent program, to mitigate vehicular trips related to new development accessing SR-138 corridor between I-5 and SR-14. (*Ibid*.) MMs 10-6 through 10-41 identify specific improvements. (See response to Comment F.8-17 for text of existing and revised mitigation measures).
75	CAPCOA List, pp. B-6, B-7	Traffic Calming**:** Project design includes pedestrian/bicycle safety and traffic calming measures in excess of jurisdiction requirements. Roadways are designed to reduce motor vehicle speeds and encourage pedestrian and bicycle trips by featuring traffic calming features. All sidewalks internal and adjacent to project site are minimum of five feet wide. All sidewalks feature vertical curbs. Roadways that converge internally within the project are routed in such a way as to avoid "skewed intersections;" which are intersections that meet at acute, rather than right, angles. Intersections internal and adjacent to the project feature one or more of the following pedestrian safety/traffic calming design techniques: marked crosswalks, count-down signal timers, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, and roundabouts or mini-circles. Streets internal and adjacent to the project feature	Yes – Functional Equivalent Required	Per the Specific Plan, Project traffic-calming measures include narrower street widths to slow automotive traffic, roundabouts, speed tables, bulb-outs at intersections to restrict roadway width and narrow the pedestrians' crossing distance, raised intersections or crosswalks, chokers that narrow a roadway at mid-block, chicanes or lateral shifts that narrow street widths and also providing on-street parking or landscaping on alternate sides of the street, textured pavement and cul-de-sacs. (DRP 2017, Appendix 2-C to Appendix 4.0A, Mobility Plan, p. 4) Representative examples of traffic calming design measures and cul-de-sac designs are provided in Chapter 3 of the Specific Plan. All neighborhoods within each village shall connect to each other via a network of local streets and trails. (*Ibid*.) Sidewalks are planned for both sides of all public streets. (*Id.,* p. 8) The Centennial roadway network would consist of small to medium-size streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations. (*Id.,* Appendix 4.0-A, p. 3-1) A variety of intersection controls will efficiently manage vehicular and non-vehicular traffic throughout Centennial to facilitate safe and efficient mobility; these include traditional stop signs on smaller streets, traffic signals at the intersections of larger project thoroughfares, grade separations and intersection designs that promote safety for all users of the street (*Id.,* p. 3-19) Additionally,

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
		pedestrian safety/traffic calming measures such as on-street parking, planter strips with street trees, and chicanes/chokers (variations in road width to discourage high-speed travel).		modern roundabouts will be located at certain secondary and collector-road intersections where four-lane and two-lane or two two-lane roadways connect, to expiate traffic and intersect with the trails and bikeways paths to ensure the safe communion between cyclists, pedestrians, and motorists. (*Ibid*.)
76	SLOAPCD List, p. 3-17	Link cul-de-sacs and dead-end streets to encourage pedestrian and bicycle travel to adjacent land uses.	Yes	Project development will include safe and convenient bicycle and pedestrian access, including an extensive network of sidewalks and greenway trails. The trails system would be comprised primarily of a County multi-use (hiking, equestrian, and mountain biking) trail and a system of community trails within the street right-of-way that can also be used as a bike path, as trails within the greenways (also considered bike paths), and as Class II Bicycle Lanes. (DRP 2017, p. 4-38) The trails system would connect residential neighborhoods to commercial, employment, schools, parks, civic, and institutional land uses. (*Ibid*.) See Draft EIR Exhibit 4-10a, Centennial Project – Recreation and Trails Plan. The Specific Plan also specifies that trails can be connected to local streets and parks through openings in cul-de-sacs. (*Id.,* Appendix 4.0-A, p. 3-88)
77	SMAQMD List, p. 9	Improve Walkability Design. Walkable street network.	Yes	Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DRP 2017, Appendix 4.0-A, p. 3-2) See rows 78 and 81 for further discussion.
78	AG List, p. 14	Ensure that the project enhances, and does not disrupt or create barriers, to non-motorized transportation.	Yes	Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DRP 2017, Appendix 4.0-A, p. 3-2) Project development

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				will include safe and convenient bicycle and pedestrian access, including an extensive network of sidewalks and greenway trails. The trails system would be comprised primarily of a County multi-use (hiking, equestrian, and mountain biking) trail and a system of community trails within the street right-of-way that can also be used as a bike path, as trails within the greenways (also considered bike paths), and as Class II Bicycle Lanes. (*Id.,* p. 4-38) The trails system would connect residential neighborhoods to commercial, employment, schools, parks, civic, and institutional land uses. (*Ibid*.) See Draft EIR Exhibit 4-10a, Centennial Project – Recreation and Trails Plan. As discussed in Specific Plan Section 3.2.4, *Bikeways*, a system of bikeways will serve the entire Project community. (*Id.,* Appendix 4.0-A, p. 3-6) The bikeways are part of the community trail system and are classified into four categories which are shown on Specific Plan Figure 3-3, *Bicycle Network*.
79	AG List, p. 13	Promote "least polluting" ways to connect people and goods to their destinations.	Yes	The Project incorporates numerous design features and measures that reduce single-occupancy vehicle travel and promote alternative modes of travel, including public transit, walking and biking, and alternative fueled vehicles. See rows 6 through 13 regarding accessibility to transit and regarding connectivity and density/intensity increases to reduce trip length and encourage biking and walking to destinations; rows 14 through 33 regarding smart growth, compact development, and density and diversity of use, all of which shorten Project-related trips length and encourage biking and walking; rows 68 through 71 regarding smart street design and complete streets; rows 77 and 78 immediately above regarding walkability and connectivity; rows 80 through 93 regarding pedestrian and bicycle friendly infrastructure and design; Rows 94-109 regarding end-of-trip facilities and bicycle parking and infrastructure; rows 110 through 112 regarding safe and efficient non-motorized travel to schools; rows 113 through 128 regarding transit infrastructure and service; rows 129 through 145 regarding electric vehicle and alternative fuel options; and rows 146 through 209 regarding Transportation Demand Management.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
80	AG List, p. 14	Connect parks and open space through shared pedestrian/bike paths and trails to encourage walking and bicycling. Create bicycle lanes and walking paths directed to the location of schools, parks and other destination points.	Yes	Per the Specific Plan, all neighborhoods within each village shall connect to each other via a network of local streets and trails. Pedestrian amenities throughout the community include specific allocations of land to greenway and community trails (described in the Trails Plan, Specific Plan Section 3.11.7) so that pedestrians can circulate throughout the community safely and efficiently. The pedestrian system is designed to avoid roadway crossings to the extent feasible. Consistent with complete streets planning, sidewalks are planned for all public streets. (DRP 2017, Appendix 4.0-A, p. 3-6) The Project includes an extensive network of sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas. (*Id.,* Appendix 4.0-A, p. 3-3; *Id.,* p. 4-34) It also includes two underpasses and one overpass over SR-138 to facilitate access to employment centers. (*Ibid*.) The following design criteria also apply to the Project, and reinforce the Mobility Plan contained in the Specific Plan: • An 80 percent average, but no less than 50 percent of all residential units located within ½ mile of a Village Core or Town Center that includes retail and services uses; • All residential units within a 5-minute walk (1/4 mile) of a park of 10,000 square feet or more, trailhead, clubhouse, or other public amenity; • Parks located within a 5-minute walk (1/4 mile) of 80 percent of all residential units; • All neighborhoods within each village connect to each other via a network of trails; • An extensive network of sidewalks, greenway trails (approximately 13 miles), and community trails (approximately 60 miles) that link residential, schools, shopping, and employment centers. (*Id.,* p. 4-34) Sidewalks widths will be compliant with the Americans with Disabilities Act and be consistent with the Specific Plan. (*Id.,* Appendix

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				2-A to Appendix 4.0-A, p. 10) Bicycle infrastructure is addressed below in rows 89 through 112. Traffic calming measures are addressed above in rows 69 through 75.
81	AG List, p. 11	Include pedestrian and bicycle facilities within projects and ensure that existing non-motorized routes are maintained and enhanced.	Yes	Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DRP 2017, Appendix 4.0-A, p. 3-2) Project development will include safe and convenient bicycle and pedestrian access, including an extensive network of sidewalks and greenway trails. The trails system would be comprised primarily of a County multi-use (hiking, equestrian, and mountain biking) trail and a system of community trails within the street right-of-way that can also be used as a bike path, as trails within the greenways (also considered bike paths), and as Class II Bicycle Lanes. (*Id.,* p. 4-38) The trails system would connect residential neighborhoods to commercial, employment, schools, parks, civic, and institutional land uses. (*Ibid*.) See Draft EIR Exhibit 4-10a, Centennial Project – Recreation and Trails Plan. As discussed in Specific Plan Section 3.2.4, *Bikeways*, a system of bikeways will serve the entire Project community. (*Id.,* Appendix 4.0-A, p. 3-6) The bikeways are part of the community trail system and are classified into four categories which are shown on Specific Plan Figure 3-3, *Bicycle Network*. See also rows 89 through 112 regarding bicycle infrastructure.
82	SLOAPCD List, p. 3-17	Provide a pedestrian-friendly and interconnected streetscape to make walking more convenient, comfortable and safe (including appropriate signalization and signage).	Yes	Per the Specific Plan, all neighborhoods within each village shall connect to each other via a network of local streets and trails. Pedestrian amenities throughout the community include specific allocations of land to greenway and community trails (described in the Trails Plan, Specific Plan Section 3.11.7) so that pedestrians can circulate throughout the community safely and efficiently. The Project includes an extensive network of sidewalks, greenway trails, and community trails that link residential, schools, shopping, and

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				employment areas. (*Id.,* Appendix 4.0-A, p. 3-3; *Id.,* p. 4-34) It also includes two underpasses and one overpass over SR-138 to facilitate access to employment centers. (*Ibid*.) See also row 81 regarding pedestrian-friendly Project design.
83	SMAQMD List, p. 9	Improve Pedestrian Network. On-site pedestrian access network links all of project internally and externally	Yes	A pedestrian network connects the entire Project site and connects to external areas, as more fully discussed above in rows 81 and 82. See also the discussion regarding complete streets and connectivity in rows 68 through 71 and 76 through 80.
84	SLOAPCD List, p. 3-17	Provide good access to/from the development for pedestrians, bicyclists, and transit users.	Yes	A pedestrian- and bicycle-friendly network connects the entire Project site and connects to external areas, as more fully discussed above in rows 81 and 82. See also the discussion regarding complete streets and connectivity in rows 68 through 71 and 76 through 80.
85	BAAQMD List, p. 4-13	Bike and Pedestrian	Yes	A pedestrian- and bicycle-friendly network connects the entire Project site and connects to external areas, as more fully discussed above in rows 81 and 82. The Project also provides extensive bicycle-related infrastructure, as addressed more fully in rows 89 through 112. See also the discussion regarding complete streets and connectivity in rows 68 through 71 and 76 through 80.
86	SJVAPCD List, p. 12-13	<u>Other Pedestrian Mitigation Measures</u>**:** 1) Provide building access paths which are physically separated from street parking lot traffic and that eliminate physical barriers such as walls, berms, landscaping and slopes that impede the use of pedestrians, bicycle facilities, or public transportation vehicles. 2) Provide continuous sidewalks separated from the roadway by landscaping and on-street parking.	Yes	1. Parking areas will be fully accessible in accordance with the Americans with Disabilities Act. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 10) Centennial will also implement a system of complete streets consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies, which would provide safe and efficient access to all Project-related areas, including buildings. (*Id.,* Appendix 4.0-A, p. 3-2) See also MM 21-22 in row 63. 2. Continuous sidewalks are planned for both sides of all public streets. (*Id.,* p. 8) Sidewalks widths will be compliant with the Americans with Disabilities Act and be consistent with the Specific Plan. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 10) 3. An extensive network of sidewalks, greenway trails (approximately 13 miles), and community trails (approximately 60 miles) link

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
		3) Provide on and off-site pedestrian facility improvements such as trails linking them to designated pedestrian commuting routes and/or on-site overpasses and wider sidewalks. 4) Link cul-de-sacs and dead-end streets to encourage pedestrian and bicycle travel. 5) Improve walkability design and provide traffic reduction modifications to project roads, such as: narrower streets, speed platforms, bulb-outs and intersection modifications designed to reduce vehicle speeds and to encourage pedestrian and bicycle travel.		residential, schools, shopping, and employment centers. (*Id.,* p. 4-34) Sidewalks will be separated from streets by a parkway containing landscaping such as swales and canopy trees. (*Id.,* Appendix 4.0-A, p. 1-5) 4. Project development will include a safe and convenient, interconnected trails system to connect residential neighborhoods to commercial, employment, schools, parks, civic, and institutional land uses. (*Ibid*.) See Draft EIR Exhibit 4-10a, Centennial Project – Recreation and Trails Plan. The Specific Plan also specifies that trails can be connected to local streets and parks through openings in cul-de-sacs. (*Id.,* Appendix 4.0-A, p. 3-88) All neighborhoods within each village shall connect to each other via a network of local streets and trails. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 4) 5. A pedestrian- and bicycle-friendly network connects the entire Project site and connects to external areas, as more fully discussed above in rows 81 and 82. Per the Specific Plan, Project traffic-calming measures include narrower street widths to slow automotive traffic, roundabouts, speed tables, bulb-outs at intersections to restrict roadway width and narrow the pedestrians' crossing distance, raised intersections or crosswalks, chokers that narrow a roadway at mid-block, chicanes or lateral shifts that narrow street widths and also providing on-street parking or landscaping on alternate sides of the street, textured pavement and cul-de-sacs. (*Id.,* Appendix 2-C to Appendix 4.0A, Mobility Plan, p. 4) Representative examples of traffic calming design measures and cul-de-sac designs are provided in Chapter 3 of the Specific Plan. All neighborhoods within each village shall connect to each other via a network of local streets and trails. (*Ibid*.)

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Row	Source	Measure	Included	Response
87	CAPCOA List, p. B.4	Pedestrian Network**:** The project provides a pedestrian access network that internally links all uses and connects to all existing/planned external streets and pedestrian facilities contiguous with the project site. Project design includes a designated pedestrian route interconnecting all internal uses, site entrances, primary building entrances, public facilities, and adjacent uses to existing external pedestrian facilities and streets. Route has minimal conflict with parking and automobile circulation facilities. Streets (with the exception of alleys) within the project have sidewalks on both sides. All sidewalks internal and adjacent to project site are minimum of five feet wide. All sidewalks feature vertical curbs. Pedestrian facilities and improvements such as grade separation, wider sidewalks, and traffic calming are implemented wherever feasible to minimize pedestrian barriers. All site entrances provide pedestrian access.	Yes	Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (DRP 2017, Appendix 4.0-A, p. 3-2) Project development will include safe and convenient bicycle and pedestrian access, including an extensive network of sidewalks and greenway trails. The Specific Plan also specifies that trails can be connected to local streets and parks through openings in cul-de-sacs. (*Id.,* Appendix 4.0-A, p. 3-88) All neighborhoods within each village shall connect to each other via a network of local streets and trails. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 4) In addition to the trails and paths, sidewalks connecting to the trail system will be provided on all public streets. (*Id.,* Appendix 4.0-A, p. 3-2) Sidewalks are planned for both sides of all public streets. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 4) A variety of intersection controls will efficiently manage vehicular and non-vehicular traffic throughout Centennial to facilitate safe and efficient mobility; these include traditional stop signs on smaller streets, traffic signals at the intersections of larger project thoroughfares, grade separations and intersection designs that promote safety for all users of the street (*Id.,* p. 3-19) Additionally, modern roundabouts will be located at certain secondary and collector-road intersections where four-lane and two-lane or two two-lane roadways connect, to expiate traffic and intersect with the trails and bikeways paths to ensure the safe communion between cyclists, pedestrians, and motorists. (*Ibid*.) Per the Specific Plan, Project traffic-calming measures include narrower street widths to slow automotive traffic, roundabouts, speed tables, bulb-outs at intersections to restrict roadway width and narrow the pedestrians' crossing distance, raised intersections or crosswalks, chokers that narrow a roadway at mid-block, chicanes or lateral shifts that narrow street widths and also providing on-street parking or landscaping on alternate sides of the street, textured pavement and cul-de-sacs. (*Id.,* Appendix 4.0-A,

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Row	Source	Measure	Included	Response
				Mobility Plan, p. 4) Representative examples of traffic calming design measures and cul-de-sac designs are provided in Chapter 3 of the Specific Plan. All neighborhoods within each village shall connect to each other via a network of local streets and trails. (*Ibid*.) Sidewalks are planned for both sides of all public streets. (*Id.,* p. 8)
88	CAPCOA List, pp. B-4, B-5	Pedestrian Barriers Minimized**:** Site design and building placement minimize barriers to pedestrian access and interconnectivity. Physical barriers such as walls, berms, landscaping, and slopes between residential and nonresidential uses that impede bicycle or pedestrian circulation are eliminated.	Yes	The Project minimizes pedestrian barriers and creates a safe, efficient pedestrian network connecting the entire site, and includes many site design features to encourage walking and to improve walkability, as discussed more fully in rows 63 through 86.
89	CAPCOA List, pp. B-2, B-3	Proximity to Bike Path/Bike Lanes: Entire project is located within one-half mile of an existing/planned Class I or Class II bike lane and project design includes a comparable network that connects the project uses to the existing offsite facility. Project design includes a designated bicycle route connecting all units, onsite bicycle parking facilities, offsite bicycle facilities, site entrances, and primary building entrances to existing Class I or Class II bike lane(s) within one-half mile. Bicycle route connects to all streets contiguous with project site. Bicycle route has minimum conflicts with automobile parking and circulation facilities. All streets internal to the project wider than 75 feet have Class II bicycle lanes on both sides.	Yes	Buildout of the Project would result in consistency with this requirement. As discussed in Specific Plan Section 3.2.4, *Bikeways*, a system of bikeways will serve the entire Project community. (DRP 2017, Appendix 4.0-A, p. 3-6) The bikeways are part of the community trail system and are classified into four categories which are described below and shown on Specific Plan Figure 3-3, *Bicycle Network*. (*Ibid*.) **Bike Path (Class I Multi-use trail).** Class I multi-use trail bikeways provide a completely separated travel way for the exclusive use of bicyclists and pedestrians, with crossflow minimized. These bikeways are generally located in community trails and greenways. (*Ibid*.) **Bike Lane (Class II bikeway).** Class II bikeways include a striped lane for one-way bike travel on a street or highway. When roadways contain additional rights-of-way, a painted buffer may be included to buffer bicyclists from automobiles and transit. This buffered design is commonly referred to as an Enhanced Class II Bikeway. (*Ibid*.) **Bike Route (Class III bikeway).** Class II bikeways provide for shared use with motor vehicle traffic, and routes are marked with appropriate signage. Painted shared lane markings on pavement, commonly referred to as sharrows, may also be incorporated into Class III

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				bikeways, further identifying shared use between motorists and bicyclists. (*Ibid*.) **Protected Bike Lane (Class IV bikeway).** A protected bikeway, commonly referred to as a cycle track, combines the user experience of a separated path with the on-street infrastructure of a conventional bike lane. Cycle tracks vary in configuration. Cyclists could be separated from motor vehicle traffic through such means as raised medians, on-street parking, bollards, or elevated pathways. They may be one-way (one direction on each side of the street) or two-way (both directions side-by-side on one side of the street). The buffers shown for Class IV bikeways in Specific Plan Figures 3-6, 3-7, and 3-11 may be raised to provide additional safety for cyclist and vehicular traffic. (*Ibid*.) **Trails.** Community, Greenway, and Regional trails within Centennial also provide for shared use pathways by bicycle, pedestrian, and in some cases equestrian activities. (*Ibid*.) All major Project roadways would include bicycle infrastructure, as can be seen on Specific Plan Figures 3-2 and 3-3. See also Figures 3-6: Six-Lane Major Highway, 3-7: Four-Lane Secondary Highway, 3-8: Collector 1 – with Median, 3-9 Collector 2- without Median, and 3-10: Collector 3 – with Parking, 3-11 Industrial Collector for illustrations of bike lanes incorporated into rights-of-way. (*Id.,* Appendix 4.0-A, pp. 3-10 to 3-16).
90	AG List, p. 13	Incorporate bicycle lanes, routes, and facilities into street systems, new subdivisions, and large developments.	Yes	Project development will include safe and convenient bicycle and pedestrian access, including an extensive network of sidewalks and greenway trails. The trails system would be comprised primarily of a County multi-use (hiking, equestrian, and mountain biking) trail and a system of community trails within the street right-of-way that can also be used as a bike path, as trails within the greenways (also considered bike paths), and as Class II Bicycle Lanes. (DRP 2017, p. 4-38) The trails system would connect residential neighborhoods to commercial, employment, schools, parks, civic, and institutional land uses. (*Ibid*.) See Draft EIR Exhibit 4-10a, Centennial Project – Recreation and Trails Plan. As discussed in Specific Plan Section 3.2.4, *Bikeways*, a system of bikeways will serve the entire Project community. (*Id.,* Appendix 4.0-A,

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Row	Source	Measure	Included	Response
				p. 3-6) The bikeways are part of the community trail system and are classified into four categories which are described below and shown on Specific Plan Figure 3-3, *Bicycle Network*. (*Ibid*.) See row 89 for further discussion.
91	SLOAPCD List, p. 3-17	Increase number of connected bicycle routes/lanes in the vicinity of the project.	Yes	The Project provides an extensive, interconnected network of bike-accessible and dedicated bicycle-only infrastructure, as discussed more fully in rows 89 and 90, above.
92	SLOAPCD List, p. 3-17	Provide easements or land dedications and construct bikeways and pedestrian walkways.	Yes	The Project provides an extensive, interconnected network of bike-accessible and dedicated bicycle-only infrastructure, as discussed more fully in rows 89 and 90, above. The Project also provides an extensive, interconnected pedestrian network, as more fully discussed in rows 76 through 87.
93	SJVAPCD List, p. 13	Install Class I or Class II bike lanes on arterial/collector streets, or where suitable route exists.	Yes	The Project provides an extensive, interconnected network of bike-accessible and dedicated bicycle-only infrastructure, as discussed more fully in rows 89 and 90, above. This includes bicycle lanes on collector streets, as indicated in Specific Plan Figures 3-3 and 3-8 through 3-11. (*Id.,* Appendix 4.0-A, pp. 3-8, 3-13 to 3-16).
94	SLOAPCD List, p. 3-19	Provide secure on-site bicycle indoor storage, lockers, or racks.	Yes	Per MM 11-4 (as updated in response to Comment F.8-95), for nonresidential buildings with over 10 tenant-occupants, changing/shower facilities shall be provided as specified in Section A5.106.4.3, Nonresidential Voluntary Measures, of the CALGreen Code as follows: for 11 to 50 tenant-occupants, one unisex shower and two 2-tier lockers; for 51 to 100 tenant-occupants, one unisex shower and three 2-tier lockers; for 101 to 200 tenant-occupants, one shower per gender and four 2-tier lockers; and for over 200 tenant-occupants, one shower per gender for each 200 additional tenant-occupants and one 2-tier locker for each 50 additional tenant-occupants. (DRP 2017, p. 5.11-79) This standard regarding showers per tenant-occupants is consistent with CALGreen requirements and is sufficient. Per the Centennial Green Development Program, nonresidential buildings in the Business Park and Commercial areas with 75,000 or more square feet of gross floor area shall provide locker rooms and

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Row	Source	Measure	Included	Response
				shower facilities of a size and at a location deemed appropriate by the County to encourage commuters to ride to work. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 16) There are no existing park and ride lots, but the Project would provide for two transit hubs, which would provide secure and convenient bike storage facilities. (*Id.,* p. 17)
95	CAPCOA List, p. B-1	End of Trip Facilities**:** Nonresidential projects provide "end-of-trip" facilities including showers, lockers, and changing space (e.g., four clothes lockers and one shower provided for every 80 employee parking spaces, separate facilities for each gender for projects with 160 or more employee parking spaces).	Yes – Functional Equivalent Required	Per MM 11-4 (as updated in response to Comment F.8-95), for nonresidential buildings with over 10 tenant-occupants, changing/shower facilities shall be provided as specified in Section A5.106.4.3, Nonresidential Voluntary Measures, of the CALGreen Code as follows: for 11 to 50 tenant-occupants, one unisex shower and two 2-tier lockers; for 51 to 100 tenant-occupants, one unisex shower and three 2-tier lockers; for 101 to 200 tenant-occupants, one shower per gender and four 2-tier lockers; and for over 200 tenant-occupants, one shower per gender for each 200 additional tenant-occupants and one 2-tier locker for each 50 additional tenant-occupants. (DRP 2017, p. 5.11-79) This standard regarding showers per tenant-occupants is consistent with CALGreen requirements and is sufficient.
96	SLOAPCD List, p. 3-18	Provide employee lockers and showers. One shower and 5 lockers for every 25 employees are recommended.	Yes – Functional Equivalent Required	Per MM 11-4 (as updated in response to Comment F.8-95), for nonresidential buildings with over 10 tenant-occupants, changing/shower facilities shall be provided as specified in Section A5.106.4.3, Nonresidential Voluntary Measures, of the CALGreen Code as follows: for 11 to 50 tenant-occupants, one unisex shower and two 2-tier lockers; for 51 to 100 tenant-occupants, one unisex shower and three 2-tier lockers; for 101 to 200 tenant-occupants, one shower per gender and four 2-tier lockers; and for over 200 tenant-occupants, one shower per gender for each 200 additional tenant-occupants and one 2-tier locker for each 50 additional tenant-occupants. (DRP 2017, p. 5.11-79) This standard regarding showers per tenant-occupants is consistent with CALGreen requirements and is sufficient.
97	SLOAPCD List, p. 3-19	Provide bicycle lockers for existing 'Park and Ride' lots where absent or insufficient.	Yes – Functional	The Project does not propose park and ride lots, but it would provide for two transit hubs, which would provide secure and convenient bike storage facilities. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 17)

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Row	Source	Measure	Included	Response
			Equivalent Required	
98	SJVAPCD List, p. 12	Provide shower and locker facilities to encourage employees to bike and/or walk to work, typically one shower and three lockers for every 25 employees.	Yes – Functional Equivalent Required	Per MM 11-4 (as updated in response to Comment F.8-95), for nonresidential buildings with over 10 tenant-occupants, changing/shower facilities shall be provided as specified in Section A5.106.4.3, Nonresidential Voluntary Measures, of the CALGreen Code as follows: for 11 to 50 tenant-occupants, one unisex shower and two 2-tier lockers; for 51 to 100 tenant-occupants, one unisex shower and three 2-tier lockers; for 101 to 200 tenant-occupants, one shower per gender and four 2-tier lockers; and for over 200 tenant-occupants, one shower per gender for each 200 additional tenant-occupants and one 2-tier locker for each 50 additional tenant-occupants. (DRP 2017, p. 5.11-79) This standard regarding showers per tenant-occupants is consistent with CALGreen requirements and is sufficient.
99	SLOAPCD List, p. 3-19	Provide on-site bicycle parking both short term (racks) and long term (lockers, or a locked room with standard racks and access limited to bicyclist only) to meet peak season maximum demand. One bike rack space per 10 vehicle/employee space is recommended.	Yes – Functional Equivalent Required	Sufficient and appropriate amounts of safe and convenient bicycle parking is included in the Project, and provide the functional equivalent with regard to emissions reductions, as discussed below: For nonresidential uses, bicycle parking shall be provided as specified in MM 21-17: Bicycle parking spaces at a rate of 5 percent of minimum required vehicle parking spaces for non-residential land uses. (DRP 2017, p. 5.21-91) Further, for residential and nonresidential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the 2016 CALGreen Code or County Code Section 22.52.1225B, whichever is more stringent. (*Id.,* 5.11-81, 5.21-92.)
100	AG List, p. 13	Require amenities for non-motorized transportation, such as secure and convenient bicycle parking.	Yes	Sufficient and appropriate amounts of safe and convenient bicycle parking and end-of-trip facilities are included in the Project, for both residential and nonresidential use, as specified in MMs 11-4, 11-5, 11-6, 21-17, 21-18, and 21-19, and as further discussed in rows 94 through 99 above and 101 through 109 below.

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Row	Source	Measure	Included	Response
101	CAPCOA List, p. B-10	Garage Bicycle Storage**:** Provide storage space in one-car garages for bicycles and bicycle trailers.	Yes	Single-family homes will be constructed with garages which have adequate space for bicycle storage. (DRP 2017, Appendix 3-C to Appendix 4.0-A, Housing Glossary).
102	CAPCOA List, p. B-1	Bike Parking**:** Nonresidential projects provide plentiful short- and long-term bicycle parking facilities to meet peak season maximum demand (e.g., one bike rack space per 20 vehicle/employee parking spaces.	Yes – Functional Equivalent Required	For nonresidential uses, bicycle parking shall be provided as specified in MM 21-17: Bicycle parking spaces at a rate of 5 percent of minimum required vehicle parking spaces for non-residential land uses. (DRP 2017, p. 5.21-91) Further, for residential and nonresidential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code or County Code Section 22.52.1225B, whichever is more stringent. (*Id.,* 5.11-81, 5.21-92.)
103	CAPCOA List, pp. B-1, B-2	Bike-Parking at Multi-Unit Residential**:** Long-term bicycle parking is provided at apartment complexes or condominiums without garages (e.g., one longterm bicycle parking space for each unit without a garage). Long-term facilities shall consist of one of the following: a bicycle locker, a locked room with standard racks and access limited to bicyclists only, or a standard rack in a location that is staffed and/or monitored by video surveillance 24 hours per day.	Yes – Functional Equivalent Required	As noted in MM 11-5, the Project shall provide permanently anchored bicycle racks within 100 feet of visitor's entrances of residential buildings, for five percent of visitor motorized vehicle parking capacity within a minimum of one two-bike capacity rack. With regard to long-term bicycle parking for multifamily buildings, the Project shall provide on-site and convenient parking for at least one bike per every two dwelling units, which may include, but is not limited to: 1) Covered, lockable enclosures with permanently anchored racks for bicycles; 2) Lockable bicycle rooms with permanently anchored racks; 3) Lockable, permanently anchored bicycle lockers. (DRP 2017, p. 5.11-80)
104	SLOAPCD List, p. 3-20	Provide storage space in garage for bicycle and bicycle trailers, or covered racks / lockers to service the residential units.	Yes	With regard to long-term bicycle parking for multifamily buildings, the Project shall provide on-site and convenient parking for at least one bike per every two dwelling units, which may include, but is not limited to: 1) Covered, lockable enclosures with permanently anchored racks for bicycles; 2) Lockable bicycle rooms with permanently anchored racks; 3) Lockable, permanently anchored bicycle lockers. (DRP 2017, p. 5.11-80) Single-family homes will be constructed with garages which are anticipated to have adequate space for bicycle storage. (*Id.,* Appendix 3-C to Appendix 4.0-A, Housing Glossary).

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Row	Source	Measure	Included	Response
105	SJVAPCD List, p. 12	Provide Class I or Class II bicycle parking/storage facilities on-site. Bicycle parking facilities should be near destination points and easy to find. At least one bicycle parking space for every 20 vehicle parking spaces.	Yes	Sufficient and appropriate amounts of safe and convenient bicycle parking is included in the Project, and provide the functional equivalent with regard to emissions reductions, as discussed below: As noted in MM 11-5, the Project shall provide permanently anchored bicycle racks within 100 feet of visitor's entrances of residential buildings, for five percent of visitor motorized vehicle parking capacity within a minimum of one two-bike capacity rack. With regard to long-term bicycle parking for multifamily buildings, the Project shall provide on-site and convenient parking for at least one bike per every two dwelling units, which may include, but is not limited to: 1) Covered, lockable enclosures with permanently anchored racks for bicycles; 2) Lockable bicycle rooms with permanently anchored racks; 3) Lockable, permanently anchored bicycle lockers. (*Id.,* p. 5.11-80) For hotel and motel buildings, the requirement is one on-site space for every 25,000 square feet, but not less than two spaces – they may be of the same type, but not limited to, as those for multifamily buildings. (*Id.,* p. 5.11-81) See also the Centennial Green Development Program at page 16. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 16). For nonresidential uses, bicycle parking shall be provided as specified in MM 21-17: Bicycle parking spaces at a rate of 5 percent of minimum required vehicle parking spaces for non-residential land uses. (*Id.,* p. 5.21-91) Further, for residential and nonresidential parking facilities, bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code or County Code Section 22.52.1225B, whichever is more stringent. (*Id.,* 5.11-81, 5.21-92.)
106	SJVAPCD List, p. 12	Provide Class I bicycle parking at apartment complexes or condos without garages.	Yes	As noted in MM 11-5, the Project shall provide permanently anchored bicycle racks within 100 feet of visitor's entrances of residential buildings, for five percent of visitor motorized vehicle parking capacity within a minimum of one two-bike capacity rack. With regard to long-term bicycle parking for multifamily buildings, the Project shall provide on-site and convenient parking for at least one bike per every two dwelling units, which may include, but is not limited to: 1) Covered, lockable enclosures with permanently anchored racks for bicycles; 2)

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Row	Source	Measure	Included	Response
				Lockable bicycle rooms with permanently anchored racks; 3) Lockable, permanently anchored bicycle lockers. (DRP 2017, p. 5.11-80) For hotel and motel buildings, the requirement is one on-site space for every 25,000 square feet, but not less than two spaces – they may be of the same type, but not limited to, as those for multifamily buildings. (*Id.,* p. 5.11-81) See also the Centennial Green Development Program at page 16. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 16).
107	SLOAPCD List, p. 3-20	At community event centers (i.e., amphitheaters, theaters, and stadiums) provide valet bicycle parking.	Yes, Functional Equivalent Required and MM Added	The Centennial Green Development Program specifies that the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following relevant bicycle parking features have been incorporated into building designs or specifications: Provide permanently anchored bicycle racks within 200 feet of visitors' entrances of nonresidential buildings, readily visible to passerby, for 5 percent of new visitor motorized vehicle parking spaces being added, with a minimum of two-bike capacity rack. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 16) In addition, the following is added to the end of the bullet point list in MM 10-25 as one of the measures required for implementation of the Mobility Plan: • <u>Require TMA implementation of a combination of measures to provide adequate temporary bike parking during large public events conducted at civic center, large amphitheaters, fairgrounds or athletic stadium uses that may be permitted, temporarily permitted, or conditionally permitted on the Project site pursuant to the Specific Plan. Such measures may include, but are not limited to, providing valet bike parking, temporarily anchored bike parking racks, or a secured temporary bike parking enclosure.</u>

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Row	Source	Measure	Included	Response
108	CAPCOA List, p. B-10	Valet Bicycle Parking**:** Provide spaces for the operation of valet bicycle parking at community event "centers" such as amphitheaters, theaters, and stadiums.	Yes, Functional Equivalent Required and MM Added	The Centennial Green Development Program specifies that the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that the following relevant bicycle parking features have been incorporated into building designs or specifications: Provide permanently anchored bicycle racks within 200 feet of visitors' entrances of nonresidential buildings, readily visible to passerby, for 5 percent of new visitor motorized vehicle parking spaces being added, with a minimum of two-bike capacity rack. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 16) Please also see the addition to MM 10-25 made in row 107, immediately above.
109	SJVAPCD List, p. 6	Bicycle Infrastructure-Based Mitigation Measures Provide bicycle enhancing infrastructure that includes: bikeways/paths connecting to a trail system; secure bicycle parking; and/or employee lockers and showers	Yes	Bikeways and paths, bicycle parking, and employee facilities are provided, as discussed in rows 89 through 106.
110	AG List, p. 14	Work with the school districts to improve pedestrian and bike access to schools and to restore or expand school bus service using lower-emitting vehicles.	Yes	Non-motorized transportation planning elements are integrated into the Centennial Mobility Plan to encourage non-automotive transit modes and provide safe routes to school. An extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) would link residential, schools, shopping, and employment areas. (DRP 2017, p. 4-6) The community trail system (described in Specific Plan Section 3.11.7, Trails Plan) provides shared-use pathways for bicycles, pedestrian and, in some cases, equestrian activities. Bikeways are classified into four categories that are described in Specific Plan Section 3.2.4 and shown on Specific Plan Figure 3-3, *Bicycle Network*. These passageways are designed to avoid roadway crossings to the extent feasible and to give easy access to retail, jobs and other amenities. With their safe design that encourages "eyes on trails," families will be able to walk to school while enjoying the natural open spaces set aside throughout Centennial. In addition to the trails and paths, sidewalks connecting to the trail system will be provided on all public streets. (*Id.,* Appendix 4.0-A, p. 3-2)

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Row	Source	Measure	Included	Response
				The following addition is also hereby made to MM 15-2: **MM 15-2** The Project Applicant/Developer shall demonstrate to the County that they have an executed agreement with all school districts that operate within the boundaries of the Project site. <u>The Transportation Management Association shall coordinate with local schools and school districts to establish and maintain a Safe Routes to School program to facilitate students walking and biking to schools.</u>
111	2008 OPR p. 20	Create bicycle lanes and walking paths directed to the location of schools, parks and other destination points.	Yes	An extensive network of sidewalks, greenway trails (about 13 miles), and community trails (about 60 miles) would link residential, schools, shopping, and employment areas. (DRP 2017, p. 4-6) See also row 110.
112	2008 OPR List, p. 20	Develop a Safe Routes to School program that allows and promotes bicycling and walking to school.	Yes	See the addition to MM 15-2, set forth in row 110, above.
Transit Infrastructure and Service				
113	Ag List, p. 12	Build or fund a major transit stop within or near the development.	Yes – Functional Equivalent Required	The Project includes a comprehensive system of transportation that provides alternatives to the automobile through a coordinated network of public transit routes, bikeways, and pedestrian trails. (DRP 2017, p. 4-37) A transit route easement no less than 25 feet wide shall be reserved in the CCD (connecting the Town Center, BP and I/C areas) and also running northerly connecting to the Village 5 Core. At buildout, a local backbone route along the major north/south collectors would be provided connecting from SR-138 to the northern end of the Project site. (*Ibid*.) This backbone route would be supplemented by feeder lines that loop through the Project (local transit routes). (*Ibid*.) The transfer locations along the backbone route would provide connectivity to the local system (*Id.,* Exhibit 4-7). Transit facilities and a transportation demand management program for Centennial will be planned and implemented by the TMA. At

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Row	Source	Measure	Included	Response
				Centennial, two transit centers are proposed in locations strategic to job sites, retail and Centennial's extensive trails system, encouraging residents to ride share and providing a dedicated location for public transit drop-off and pick-up. (*Id.,* Appendix 4.0-A, p. 3-2) The centers will also be close to SR-138 to allow quick and easy freeway access. (*Ibid*.) The centers would provide convenient access to public bus transportation, carpooling, park and ride, special charter operations, and/or similar types of activities related to local or off-site transit usage. (*Id.,* p. 4-37) The centers' design will incorporate information stations with real-time updates, well-lit and safe parking lots, adequate cover from the elements, and waiting areas with restroom and shower facilities to encourage use by cyclists. (*Id.,* Appendix 4.0-A, p. 3-2.) To accommodate residents during their commuting downtime, each transit center will also offer free wifi connections. (*Ibid*.) As noted above, a key Transportation Demand Management (TDM) element of the Project's Mobility Plan is the "Creation and ongoing operation of a Transportation Management Association (TMA) to fund and manage the operation of ongoing transportation programs, including but not limited to transit and on-demand services." (*Id.,* p. 5.10-37.) With regard to transit, relevant TMA activities include: • Coordinate with regional and local transit providers to develop transit service for Centennial; • Conduct transit network meetings/workshops; and • Monitor transportation-related technological developments for potential deployment in Centennial. • Partner with Antelope Valley Transit Authority to provide bus service within Centennial and to the rest of the Antelope Valley. (*Id.,* p. 4-36) • Partner with Santa Clarita Transit Authority to provide bus service within Centennial and to the rest of the Santa Clarita Valley.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				• Partner with Kern Transit to provide bus service between Centennial and the neighboring communities of Tejon Mountain Village, Tejon Ranch Commerce Center and Grapevine to the north. • Provide ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. • Identify locations for transit centers in proximity to village cores and employment centers such as business park and institutional/civic land uses. (*Id.,* p. 4-37) Per the Centennial Mobility Plan, the TMA will adaptively manage compliance with the Centennial internal and external mobility performance standards by conducting transit mode surveys and other appropriate monitoring activities. TDM measures will implemented by the TMA as may be required to ensure that minimum of 20 percent of total daily peak morning and afternoon external trips and a minimum of 30 percent of total daily internal trips are completed by using non-SOV transit modes. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 1) The TMA shall evaluate the feasibility and effectiveness of the TDM measures included in Mobility Plan Table 2-C-2, which includes various measures discussed in more detail within rows 147 through 156 and 160 through 199, below. (*Id.,* Appendix 2-C to Appendix 4.0-A, Table 2-C-2, pp. 11 to 16). See Row 11 for further discussion.
114	AG List, p. 11	Incorporate public transit into project design.	Yes – Functional Equivalent Required	The Project includes a comprehensive system of transportation that provides alternatives to the automobile through a coordinated network of public transit routes, bikeways, and pedestrian trails. It will also forge partnerships with local transit agencies to improve and increase public transit connections within the Project site and to connecting areas, and transit facilities and a transportation demand management program for Centennial will be planned and implemented by the TMA. See rows 113 and 118 for further discussion.

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Row	Source	Measure	Included	Response
115	BAAQMD List, p. 4-12	Transit Service	Yes – Functional Equivalent Required	The Project includes a comprehensive system of transportation that provides alternatives to the automobile through a coordinated network of public transit routes, bikeways, and pedestrian trails. It will also forge partnerships with local transit agencies to improve and increase public transit connections within the Project site and to connecting areas, and transit facilities and a transportation demand management program for Centennial will be planned and implemented by the TMA. See rows 113 and 118 for further discussion.
116	2008 OPR List, p. 18	Incorporate features into project design that would accommodate the supply of frequent, reliable and convenient public transit.	Yes	The Project includes a comprehensive system of transportation that provides alternatives to the automobile through a coordinated network of public transit routes, bikeways, and pedestrian trails. It will also forge partnerships with local transit agencies to improve and increase public transit connections within the Project site and to connecting areas, and transit facilities and a transportation demand management program for Centennial will be planned and implemented by the TMA. See rows 113 and 118 for further discussion.
117	SJVAPCD List, p. 5	Transit-Infrastructure Based Mitigation Measures: Provide transit enhancing infrastructure that includes: transit shelters, benches, etc.; street lighting; route signs and displays; and/or bus turnouts/bulbs. Provide a Bus Rapid Transit (BRT) System	Yes – Functional Equivalent Required	With regard to the Bus Rapid Transit System, see rows 113 and 118. With regard to transit service infrastructure, the Project proposes to provide two Transit Hubs to improve the efficiency of matching localized trips with regional (off-site) trips, and connect to multi-modal transportation options such as local and regional bus services, on-demand car services, carpools and vanpools, and that provides secure and convenient bike storage for cyclists. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 17) Transit Hubs shall provide a minimum of one alternative energy vehicle charging stations with multiple outlets, free wifi, and real time tracking of transit. (*Ibid*.) It would be the responsibility of the TMA to provide transit route maps and schedules. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 10) Transit Hubs shall have adequate pedestrian, bicycle, and parking facilities for off-site transit connection service. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 17) The centers would provide convenient access to public bus transportation, carpooling, park and ride, special charter operations, and/or similar types of activities related to local or off-site transit usage. (*Id.,* p. 4-37). An information center would be an important part of the services

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				offered, and the primary objective of such centers is to provide focal and gathering points for a variety of private and public transportation activities, all of which reduce dependency on the private automobile. (*Ibid*.) Commuter service may be provided by Santa Clarita Transit, Antelope Valley Transit, or a combination of both, and it is envisioned that commuter service from Centennial would be integrated with existing services provided by these operators and would connect Centennial to existing Metrolink service, future high-speed rail service, and employment centers throughout the region. (*Id.,* p. 4-38) These centers would, at least initially, be used to promote carpooling and vanpooling until such time as ridership justifies commuter service. (*Ibid*.)
118	SMAQMD List, p. 10	Provide BRT System. Establish a Bus Rapid Transit line with permanent operational funding stream.	Yes – Functional Equivalent Required	Providing a Bus Rapid Transit System is a transportation and vehicle demand measure included on the potential roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 13) See row 146 regarding implementation of the TMA program and consideration of the measures included in Mobility Plan Table 2-C-2 to meet performance standards. As part of the Project's overall transportation demand management (TDM) strategy to reduce the dependence on the private automobile, which would result in a consequential reduction in overall volume of Project-generated trips off site, the Project Applicant will participate in or form a Transportation Management Association (TMA) to serve the residents and employees of businesses within the Project area or will be organized in conjunction with an existing organization in the Antelope Valley or Santa Clarita area. (*Id.,* p. 5.10-141) If the former, the Centennial TMA will specifically develop strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations in order to maximize transit efficiencies and services. (*Ibid*.) Such coordination will also help match ride sharers and provide information on transit options; The TMA's purpose will be to coordinate and facilitate transit and rideshare usage to serve as many riders as possible. (*Ibid*.) The Project's TMA would coordinate with public transportation providers to provide transit service, special charter

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Row	Source	Measure	Included	Response
				operations, and other similar types of transit to reduce vehicle trips. (*Id.,* p. 5.10-143) Commuter buses that may be utilized by Project residents to travel to and from the Santa Clarita Valley, Antelope Valley and the Tejon Ranch Commerce Center are expected to lead to 100 less vehicle trips to and from the Santa Clarita Valley and 50 less vehicle trips to and from the Antelope Valley during peak hours on weekdays. (*Id.,* p. 5.10-141.) Specifically, the TMA would: • Coordinate with regional and local transit providers to develop transit service for Centennial; • Conduct transit network meetings/workshops; and • Monitor transportation-related technological developments for potential deployment in Centennial. • Partner with Antelope Valley Transit Authority to provide bus service within Centennial and to the rest of the Antelope Valley. (*Id.,* p. 4-36) • Partner with Santa Clarita Transit Authority to provide bus service within Centennial and to the rest of the Santa Clarita Valley. • Partner with Kern Transit to provide bus service between Centennial and the neighboring communities of Tejon Mountain Village, Tejon Ranch Commerce Center and Grapevine to the north. • Provide ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. • Identify locations for transit centers in proximity to village cores and employment centers such as business park and institutional/civic land uses. (*Id.,* p. 4-37) A bus storage and maintenance facility would also be provided in future phases of the development, if necessary. (*Id.,* p. 4-38)

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Row	Source	Measure	Included	Response
119	SMAQMD List, p. 10	Expand Transit Network. Established or enhances bus line with permanent operational funding stream.	Yes – Functional Equivalent Required	The Project includes a comprehensive system of transportation that provides alternatives to the automobile through a coordinated network of public transit routes, bikeways, and pedestrian trails. It will also forge partnerships with local transit agencies to improve and increase public transit connections within the Project site and to connecting areas, and transit facilities and a transportation demand management program for Centennial will be planned and implemented by the TMA. See rows 113 and 118 for further discussion.
120	SMAQMD List, p. 10	Increase Transit Frequency. Reduces headways of existing transit.	Yes – Functional Equivalent Required	While the Project does not include the provision of a new fleet of buses, the Project includes a comprehensive system of transportation that provides alternatives to the automobile through a coordinated network of public transit routes, bikeways, and pedestrian trails. It will also forge partnerships with local transit agencies to improve and increase public transit connections within the Project site and to connecting areas, and transit facilities and a transportation demand management program for Centennial will be planned and implemented by the TMA. See rows 113 and 118 for further discussion.
121	SLOAPCD List, p. 3-19	If the project is located on an established transit route, provide improved public transit amenities (i.e., covered transit turnouts, direct pedestrian access, covered bench, smart signage, route information displays, lighting etc.).	Yes – Functional Equivalent Required	The Project proposes to provide two Transit Hubs, as discussed further in row 121. to improve the efficiency of matching localized trips with regional (off-site) trips and connect to multi-modal transportation options such as local and regional bus services, on-demand car services, carpools and vanpools, and that provides secure and convenience bike storage for cyclists. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 17) Transit Hubs shall provide a minimum of one alternative energy vehicle charging stations with multiple outlets, free wifi, and real time tracking of transit. (*Ibid*.) It would be the responsibility of the TMA to provide transit route maps and schedules. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 10) Transit Hubs shall have adequate pedestrian, bicycle, and parking facilities for off-site transit connection service. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 17) The centers would provide convenient access to public bus transportation, carpooling, park and ride, special charter operations, and/or similar types of activities related to local or off-site transit usage. (*Id.,* p. 4-37). An information center would be an important part of the services offered, and the primary objective of such

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				centers is to provide focal and gathering points for a variety of private and public transportation activities, all of which reduce dependency on the private automobile. (*Ibid.*) Commuter service may be provided by Santa Clarita Transit, Antelope Valley Transit, or a combination of both, and it is envisioned that commuter service from Centennial would be integrated with existing services provided by these operators and would connect Centennial to existing Metrolink service, future high-speed rail service, and employment centers throughout the region. (*Id.,* p. 4-38) These centers would, at least initially, be used to promote carpooling and vanpooling until such time as ridership justifies commuter service. (*Ibid*.)
122	SLOAPCDList, p. 3-17	Project is located within one-half mile of a 'Park and Ride' lot or project installs a 'Park and Ride' lot with bike lockers in a location of need defined by SLOCOG.	Yes – Functional Equivalent Required	The Project does not propose park and ride lots, but it proposes to provide for two transit hubs, which would provide secure and convenient bike storage facilities. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 17) See row 121 for further discussion.
123	CAPCOA List, p. B-5	Bus Shelter for Existing/Planned Transit Service**:** Bus or streetcar service provides headways of one hour or less for stops within one-quarter mile; project provides safe and convenient bicycle/pedestrian access to transit stop(s) and provides essential transit stop improvements (i.e., shelters, route information, benches, and lighting).	Yes – Functional Equivalent Required	While the Project does not include the provision of a new fleet of buses, the Project includes a comprehensive system of transportation that provides alternatives to the automobile through a coordinated network of public transit routes, bikeways, and pedestrian trails. It will also forge partnerships with local transit agencies to improve and increase public transit connections within the Project site and to connecting areas, and transit facilities and a transportation demand management program for Centennial will be planned and implemented by the TMA. See row 113 and 118 for further discussion. The Project proposes to provide two Transit Hubs with convenient access throughout the Project site, as discussed further in row 121.
124	SJVAPCD List, p. 9	Transit Operational Mitigation Measures: Provide transit incentives. 1. Transit use incentives for employees, e.g., on-site distribution of passes, subsidized transit passes, etc.	Yes	1. This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 12) Implement Subsidized or Discounted Transit Program – that would partially or wholly cover the costs of daily or monthly public transit (i.e., bus) passes and may also include free transfers between stations.

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Row	Source	Measure	Included	Response
		2. Transit route maps and schedules posted at worksite. 3. Design and locate buildings to facilitate transit access, e.g., locate building entrances near transit stops, eliminate building setbacks, etc.		Traffic volume is reduced by encouraging public transit as opposed to a personal vehicle. (*Ibid*.) See row 146 regarding implementation of TMA measures. 2. MM 10-1 requires a community intranet that would provide access to information regarding carpooling and local transit services. (*Id.,* p. 5.10-144; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 4; *Id.,* Appendix 4.0-A, p. 3-3) It would also be the responsibility of the TMA to provide transit route maps and schedules at the Transit Hubs. (*Id.,* p. 4-36; Appendix 2-C to Appendix 4.0-A, p. 10) 3. Pedestrian-oriented design features encourage people to use public transit and therefore reduce traffic volume. Centennial is pedestrian-oriented and will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies. The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, transit riders, cyclists, and pedestrians. (*Id.,* Appendix 4.0-A, p. 3-2)
125	SLOAPCD List, p. 3-19	Project provides a display case or kiosk displaying transportation information in a prominent area accessible to employees or residents.	Yes	MM 10-1 requires a community intranet that would provide access to information regarding carpooling and local transit services. (DRP 2017, p. 5.10-144; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 4; *Id.,* Appendix 4.0-A, p. 3-3) It would also be the responsibility of the TMA to provide transit route maps and schedules at the Transit Hubs. (*Id.,* p. 4-36; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 10)
126	SJVAPCD List, p. 13	Provide a display case or kiosk displaying transportation information in a prominent area accessible to employees, residents, or visitors.	Yes	MM 10-1 requires a community intranet that would provide access to information regarding carpooling and local transit services. (DRP 2017, p. 5.10-144; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 4; *Id.,* Appendix 4.0-A, p. 3-3) It would also be the responsibility of the TMA to provide transit route maps and schedules at the Transit Hubs. (*Id.,* p. 4-36; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 10)

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Row	Source	Measure	Included	Response
127	SJVAPCD List, p. 13	Display Bike Route Maps, Bus Schedules, and any other transportation information such as carpooling, car sharing.	Yes	MM 10-1 requires a community intranet that would provide access to information regarding carpooling and local transit services. (DRP 2017, p. 5.10-144; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 4; *Id.,* Appendix 4.0-A, p. 3-3) It would also be the responsibility of the TMA to provide transit route maps and schedules at the Transit Hubs. (*Id.,* p. 4-36; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 10)
128	CAPCOA List, p. B-31	Goods Transport by Rail**:** Provide a spur at nonresidential projects to use nearby rail for goods movement.	No. Not feasible.	The Project site is not proximate to rail facilities. This measure is not feasible.
Electric Vehicle/Alternative Fuel Options and Emissions Reductions				
129	AG List, p. 15	Purchase, or create incentives for purchasing, low or zero-emission vehicles	Yes	The Project provide incentives for purchasing zero-emission electric and other alternative-fueled vehicles by incorporating preferential parking for alternative fueled vehicles into Project uses, and providing extensive electric vehicle charging infrastructure throughout the Project site. Per MM 21-15 (as updated in response to Comment F.8-95), the Project will provide one 208/240 VAC receptacle for charging electric vehicles in each detached and attached single-family residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A4.106.4.1. (DRP 2017, p. 5.21-91) Per MM 21-16 (as updated in response to Comment F.8-95), "alternative energy fueling stations" shall be installed as follows, and each provide for the charging of two electric vehicles: • Business Park and Institutional land use designations shall provide a minimum of one alternative energy vehicle fueling station on site for the first 50,000 square feet of usable floor space and additional alternative energy vehicle fueling stations for each additional 50,000 square feet of usable floor space thereafter. • Multi-family residential buildings of at least 17 residential units shall provide a minimum of one alternative energy vehicle fueling station for the first 17 residential units and an additional

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				alternative energy vehicle fueling station for each additional 17 residential units thereafter. • The Town Center and each Village Center shall provide a minimum of one alternative energy vehicle charging station. • Designated Transit Hubs shall provide a minimum of one alternative energy vehicle charging station. (*Id.,* p. 5.21-91) MM 21-17 requires that non-residential buildings shall have preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles. (*Id.,* pp. 5.21-91, -92) MM 21-18 requires that for multi-family residential buildings, visitor parking shall include preferentially located parking spaces for alternative-fueled vehicles. (*Id.,* p. 5.21-92) MMs 11-6 and 21-19 (as updated by response to Comment F.8-95) require that for parking structures and lots with more than 20 spaces that serve uses other than residential or nonresidential buildings (e.g., trailheads, parks), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, they shall include a minimum of five percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles; five percent of the total number of parking spaces in parking facility (but in no case less than one) shall be Electric Vehicle Parking Spaces consistent with CALGreen requirements and specifications articulated in MMs 21-19 and 11-6, and bike parking for residential facilities must be provided as specified in Section A.4.106.9, Residential Voluntary Measures, of the CALGreen Code, or as required by County Code Section 22.52.1225B, whichever is more stringent. (*Id.,* pp. 5.21-92, 5.11-81) See also MM 11-4, as updated by response to Comment F.8-95, regarding the installation of Electric Vehicle Supply Equipment as defined by CALGreen Code Section 202, in nonresidential buildings. See also the Centennial Green Development Program specifications regarding electric vehicle infrastructure. (*Id.,* Appendix 2-A to Appendix

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Row	Source	Measure	Included	Response
				4.0-A, p. 14) See below under *Transportation Demand Management* with regard to car-sharing.
130	SJVAPCD List, p. 14	Install electric vehicle recharging station with both conductive and inductive charging capabilities in residential garages / parking lots.	Yes	The Project provides extensive electric vehicle charging facilities, as required in MMs 21-16, 21-19, 11-4, and 11-6, discussed further in row 129. As indicated in Table 2-C-1 of the Mobility Plan, facilities could accommodate inductive and conductive charging. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 7).
131	Ag List, p. 16	Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles.	Yes	The Project encourages the use of zero-emission electric and other alternative-fueled vehicles by incorporating preferential parking for alternative fueled vehicles into Project uses, and providing extensive electric vehicle charging infrastructure throughout the Project site. These requirements are incorporated into MMs 11-4, 11-6, 21-15, 21-16, 21-17, and 21-19, as further discussed in row 129.
132	SLOAPCD List, p. 3-19	Provide preferential parking/no parking fee for alternative fueled vehicles or vanpools.	Yes	MMs 11-6 and 21-19 (as updated by response to Comment F.8-95) require that for parking structures and lots with more than 20 spaces that serve uses other than residential or nonresidential buildings (e.g., trailheads, parks), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, they shall include a minimum of five percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles. (DRP 2017, pp. 5.21-92, 5.11-81) MM 21-17 requires that non-residential buildings shall have preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles. (*Id.,* pp. 5.21-91, -92) MM 21-18 requires that for multi-family residential buildings, visitor parking shall include preferentially located parking spaces for alternative-fueled vehicles. (*Id.,* p. 5.21-92)

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Row	Source	Measure	Included	Response
133	SLOAPCD List, p. 3-19	Provide neighborhood electric vehicles/car share program for the development.	Yes – Functional Equivalent Required	Per the Centennial Green Development Program, the Project will require service fleet vehicles to be powered with alternative fuel technology where feasible, as determined by the individual Project Applicants/Developer. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 16) It will also promote alternative fuels for transit systems, if available, and will encourage the use of best feasible alternative fuel technology to be used in homeowners associations, refuse fleet, and other community service vehicles. (*Ibid*.) Providing a car-sharing program is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 13) The text of the measure is as follows: "Implement Car-Sharing Program (e.g. Zipcar, Car2Go) - either residential-based or employer-based programs that allow people to have on-demand access to shared vehicles, with costs determined through mileage or hourly rates with deposits or annual membership fees. Both residential and employer-based programs encourage carpooling and therefore reduce traffic volumes." (*Ibid*.) See also row 136 with regard to Neighborhood Electric Vehicles (NEV).
134	SLOAPCD List, p. 3-20	Require the installation of electrical hookups at loading docks and the connection of trucks equipped with electrical hookups to eliminate the need to operate diesel-powered TRUs at the loading docks.	Yes	Loading docks shall provide a 240-kV outlet in the vicinity of the loading dock. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 14)
135	CAPCOA List, p. B-11	Preferential Parking for EVs/CNG Vehicles. Provide preferential parking space locations for EVs/CNG vehicles. Or Reduced/No Parking Fee for EVs/CNG Vehicles. Provide a reduced/no parking fee for EVs/CNG vehicles.	Yes	MMs 11-6 and 21-19 (as updated by response to Comment F.8-95) require that for parking structures and lots with more than 20 spaces that serve uses other than residential or nonresidential buildings (e.g., trailheads, parks), and parking structures and parking lots that serve multifamily residential buildings with 17 or more multifamily units, they shall include a minimum of five percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles. (DRP 2017, pp. 5.21-92, 5.11-81) MM 21-17 requires that non-residential buildings shall have preferential parking for low-emitting, fuel-efficient, and carpool/van

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Row	Source	Measure	Included	Response
				vehicles. (*Id.,* pp. 5.21-91, -92) MM 21-18 requires that for multi-family residential buildings, visitor parking shall include preferentially located parking spaces for alternative-fueled vehicles. (*Id.,* p. 5.21-92)
136	SJVAPCD List, p. 10	Implement NEV network. (Create local 'light' vehicle network such as NEV networks. NEV are classified as 'low speed vehicles' and are electric powered and must conform to applicable federal automobile safety standards. NEV offer an alternative to traditional vehicle trips and can legally be used on roadways with speed limits of 35 mph or less, ideal for short trips up to 30 miles in length. Project will implement necessary infrastructure, including NEV parking, charging facilities, striping, and educational tools. NEV routes will be implemented throughout the project and will double as bicycle routes.	Yes	Per the Specific Plan Table 2-16 Land Use Matrix, NEV trails are permitted uses in all residential land use designations, park, R/E, OS, U, and I/C designations, and permitted in the School designation with discretionary review. (DRP 2017, Appendix 4.0-A, p. 2-48) This will allow for the use of NEVs on compatible trails. The Project's commitment to providing complete streets also includes NEVs. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 11) Per Mobility Plan Table 2-C-1: *Vehicle Use Reduction Land Use and Planning Measures Included in Transportation Plans and Agency Guidance and Research Publications and Implemented by Centennial*, the Project will "Provide EV Parking – for electric vehicles with conductive/inductive electric vehicle charging stations and signage prohibiting parking for non-electric vehicles at convenient and accessible locations. The favorable parking encourages the usage of ownership of NEVs and results in a decrease of traditional vehicle trips." (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 7) Implementation of an NEV network is also included as a measure included in Table 2-C-2, *Transportation and Vehicle Demand Measures Included in Transportation Plans and Agency Guidance and Research Publications Included on Roster of TMA Measures At Centennial*, which may be included in the mixture of measures implemented to achieve the performance standards identified in MMs 10-25 and 10-26, as discussed further in rows 146 through 156 and 160 through 199. (*Id.,* p. 11) Per Table 2-C-2, "a NEV network includes roadways, parking, charging stations, striping, signs, and educational tools and can double as bicycle routes." (*Ibid*.)

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Row	Source	Measure	Included	Response
137	SMAQMD List, p. 9	Implement NEV Network. Project provides a viable NEV network.	Yes	Per the Specific Plan Table 2-16 Land Use Matrix, NEV trails are permitted uses in all residential land use designations, park, R/E, OS, U, and I/C designations, and permitted in the School designation with discretionary review. (DRP 2017, Appendix 4.0-A, p. 2-48) This will allow for the use of NEVs on compatible trails. The Project's commitment to providing complete streets also includes NEVs. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 11) Per Mobility Plan Table 2-C-1: *Vehicle Use Reduction Land Use and Planning Measures Included in Transportation Plans and Agency Guidance and Research Publications and Implemented by Centennial*, the Project will "Provide EV Parking – for electric vehicles with conductive/inductive electric vehicle charging stations and signage prohibiting parking for non-electric vehicles at convenient and accessible locations. The favorable parking encourages the usage of ownership of Neighborhood Electric Vehicles (NEV) and results in a decrease of traditional vehicle trips." (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 7) Implementation of an NEV network is also included as a measure included in Table 2-C-2, *Transportation and Vehicle Demand Measures Included in Transportation Plans and Agency Guidance and Research Publications Included on Roster of TMA Measures At Centennial*, which may be included in the mixture of measures implemented to achieve the performance standards identified in MMs 10-25 and 10-26, as discussed further in rows 146 through 156 and 160 through 199. (*Id.,* p. 11) Per Table 2-C-2, "a NEV network includes roadways, parking, charging stations, striping, signs, and educational tools and can double as bicycle routes." (*Ibid*.)
138	CAPCOA List, p. B-17	NEV Access**:** Make physical development consistent with requirements for neighborhood electric vehicles. Current studies show that for most trips, NEVs do not replace gas-fueled vehicles as the primary vehicle.	Yes	Per the Specific Plan Table 2-16 Land Use Matrix, NEV trails are permitted uses in all residential land use designations, park, R/E, OS, U, and I/C designations, and permitted in the School designation with discretionary review. (DRP 2017, Appendix 4.0-A, p. 2-48) This will allow for the use of NEVs on compatible trails. The Project's commitment to providing complete streets also includes NEVs. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 11) Per Mobility Plan Table 2-C-1: *Vehicle Use Reduction Land Use and Planning Measures Included in Transportation Plans and Agency Guidance and Research Publications and Implemented by Centennial*, the Project will "Provide EV Parking –

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				for electric vehicles with conductive/inductive electric vehicle charging stations and signage prohibiting parking for non-electric vehicles at convenient and accessible locations. The favorable parking encourages the usage of ownership of Neighborhood Electric Vehicles (NEV) and results in a decrease of traditional vehicle trips." (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 7) Implementation of an NEV network is also included as a measure included in Table 2-C-2, *Transportation and Vehicle Demand Measures Included in Transportation Plans and Agency Guidance and Research Publications Included on Roster of TMA Measures At Centennial*, which may be included in the mixture of measures implemented to achieve the performance standards identified in MMs 10-25 and 10-26, as discussed further in rows 146 through 156 and 160 through 199. (*Id.,* p. 11) Per Table 2-C-2, "a NEV network includes roadways, parking, charging stations, striping, signs, and educational tools and can double as bicycle routes." (*Ibid*.)
139	AG List, p. 16	Create local "light vehicle" networks, such as neighborhood electric vehicle systems.	Yes	Per the Specific Plan Table 2-16 Land Use Matrix, NEV trails are permitted uses in all residential land use designations, park, R/E, OS, U, and I/C designations, and permitted in the School designation with discretionary review. (DRP 2017, Appendix 4.0-A, p. 2-48) This will allow for the use of NEVs on compatible trails. The Project's commitment to providing complete streets also includes NEVs. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 11) Per Mobility Plan Table 2-C-1: *Vehicle Use Reduction Land Use and Planning Measures Included in Transportation Plans and Agency Guidance and Research Publications and Implemented by Centennial*, the Project will "Provide EV Parking – for electric vehicles with conductive/inductive electric vehicle charging stations and signage prohibiting parking for non-electric vehicles at convenient and accessible locations. The favorable parking encourages the usage of ownership of Neighborhood Electric Vehicles (NEV) and results in a decrease of traditional vehicle trips." (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 7) Implementation of an NEV network is also included as a measure included in Table 2-C-2, *Transportation and Vehicle Demand Measures Included in Transportation Plans and Agency Guidance and Research Publications Included on Roster of TMA Measures At Centennial*, which may be included in the mixture of measures

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				implemented to achieve the performance standards identified in MMs 10-25 and 10-26, as discussed further in rows 146 through 156 and 160 through 199. (*Id.,* p. 11) Per Table 2-C-2, "a NEV network includes roadways, parking, charging stations, striping, signs, and educational tools and can double as bicycle routes." (*Ibid*.)
140	CAPCOA List, p. B-12	ULEV (Ultra-low-emission vehicle): Use of and/or provide ULEV that are 50 percent cleaner than average new model cars (e.g., natural gas, ethanol, electric).	Yes – Functional Equivalent Required	Per the Centennial Green Development Program, the Project will require service fleet vehicles to be powered with alternative fuel technology where feasible, as determined by the individual Project Applicants/Developer. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 16) It will also promote alternative fuels for transit systems, if available, and will encourage the use of best feasible alternative fuel technology to be used in homeowners associations, refuse fleet, and other community service vehicles. (*Ibid*.) The Project also provides incentives for purchasing zero-emission electric and other alternative-fueled vehicles by incorporating preferential parking for alternative fueled vehicles into Project uses, and providing extensive electric vehicle charging infrastructure throughout the Project site, as discussed in row 129.
141	CAPCOA List, p. B-13	Flex Fuel Vehicles**:** Use of and/or provide vehicles that utilize gasoline/ethanol blends (e.g., E85).	Yes – Functional Equivalent Required	Per the Centennial Green Development Program, the Project will require service fleet vehicles to be powered with alternative fuel technology where feasible, as determined by the individual Project Applicants/Developer. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 16) It will also promote alternative fuels for transit systems, if available, and will encourage the use of best feasible alternative fuel technology to be used in homeowners associations, refuse fleet, and other community service vehicles. (*Ibid*.) Gasoline/ethanol blends are one type of alternative fuel.

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Row	Source	Measure	Included	Response
142	SJVAPCD List, p. 15	1. Replace diesel fleet with alternative fuel engine technology and infrastructure. 2. Retrofit existing equipment to reduce emissions using methods such as particulate filters, oxidation catalysts, or other approved technologies. 3. Adopt a Vehicle Idling Policy requiring all vehicles under company control to adhere to a 5 minute idling policy. 4. Add-on control devices, e.g., particulate traps, catalytic oxidizers on construction equipment. 5. Repower/Retrofit heavy-duty diesel fleet with cleaner diesel engine technology and/or diesel particulate filter after-treatment technology. 6. Replace auxiliary power units with cleaner engine technology, alternative fuels, or require electric connection while at loading dock. 7. Replace diesel fleet vehicles with cleaner fueled low emission vehicles (i.e. school buses, buses, on- and off- road heavy duty vehicles, lighter duty trucks and passenger vehicles).	Yes	1. Per the Centennial Green Development Program, the Project will require service fleet vehicles to be powered with alternative fuel technology where feasible, as determined by the individual Project Applicants/Developer. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 16) It will also promote alternative fuels for transit systems, if available, and will encourage the use of best feasible alternative fuel technology to be used in homeowners associations, refuse fleet, and other community service vehicles. (*Ibid*.) 2. The Project would not require retrofitting of existing equipment. Rather, see equipment requirements under 4-7, below. 3. As noted in the AG List, under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds must already comply with a prohibition from idling for more than 5 minutes at any location. (AG List, p. 16) Project MMs 11-2 and 21-4 also require the limitation of construction equipment idling time to 3 minutes, which exceeds the standard in the suggested measure. (DRP 2017, pp. 5.11-79, 5.21-89) 4.-7. The CARB On-Road Heavy-Duty Diesel Vehicle regulation requires the use of PM filter requirements, as of 2012. Lighter and older heavier trucks were required to be replaced starting January 1, 2015, and by January 1, 2012, nearly all trucks and buses need to have 2010 model year engines or equivalent. (See https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm.) In 2007, CARB adopted its In-Use Off-Road Diesel-Fueled Fleets Regulation, which adopted regulations to reduce diesel particular matter and oxides of nitrogen emissions from off-road heavy-duty diesel vehicles in California. Starting January 1, 2018, large and medium fleets must meet emission performance requirements and are prohibited from adding any tier 2 engine vehicles to their fleet. Per MM 11-2 (as revised in response to Comment F.2-5), the Project requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				Technology devices certified by CARB or the USEPA, and any emissions-control device used by a contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If tier 4 Final equipment is not available, the Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach – these policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). (DRP 2017, pp. 5.11-78, -79)
143	SLOAPCD List, p. 3-20	If not required by other regulations (ARB's on-road or off-road diesel), restrict operation to trucks with 2007 model year engines or newer trucks.	Yes	MM 11-2 requires the use of 2010 or newer diesel haul trucks. (DRP 2017, p. 5.11-79) If the Project Applicant/Developer determines that 2010 model year or newer diesel trucks cannot be obtained, trucks that meet USEPA 2007 model year NOx emissions requirements shall be required. If 2010 model year or newer diesel trucks are not available, the Project Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. (*Ibid*.)
144	SLOAPCD List, p. 3-20	If not required by other regulations (ARB's on-road or off-road diesel), require or provide incentives to use diesel particulate filters for truck engines.	Yes	As noted in the AG List, under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds must already comply with a prohibition from idling for more than 5 minutes at any location. (AG List, p. 16) Project MMs 11-2 and 21-4 also require the limitation of construction equipment idling time to 3 minutes. (DRP 2017, pp. 5.11-79, 5.21-89) 4.-7. The CARB On-Road Heavy-Duty Diesel Vehicle regulation requires the use of PM filter requirements, as of 2012. Lighter and older heavier trucks were required to be replaced starting January 1, 2015, and by January 1, 2012, nearly all trucks and buses need to have 2010 model

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Row	Source	Measure	Included	Response
				year engines or equivalent. (See https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm) In 2007, CARB adopted its In-Use Off-Road Diesel-Fueled Fleets Regulation, which adopted regulations to reduce diesel particular matter and oxides of nitrogen emissions from off-road heavy-duty diesel vehicles in California. Starting January 1, 2018, large and medium fleets must meet emission performance requirements and are prohibited from adding any tier 2 engine vehicles to their fleet. Per MM 11-2 (as revised in response to Comment F.2-5), the Project requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, and any emissions-control device used by a contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If tier 4 Final equipment is not available, the Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach – these policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). (DRP 2017, pp. 5.11-78, -79) MM 11-2 requires the use of 2010 or newer diesel haul trucks. (*Id.,* p. 5.11-79) If the Project Applicant/Developer determines that 2010 model year or newer diesel trucks cannot be obtained, trucks that meet USEPA 2007 model year NOx emissions requirements shall be required. If 2010 model year or newer diesel trucks are not available, the Project

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Row	Source	Measure	Included	Response
				Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. (*Ibid*.)
145	SLOAPCD List, p. 3-20	Implement a "No Idling" program for heavy-duty diesel vehicles, which includes signage, citations, etc.	Yes – Functional Equivalent Required	As noted in the AG List, under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds must already comply with a prohibition from idling for more than 5 minutes at any location. (AG List, p. 16) Project MMs 11-2 and 21-4 also require the limitation of non-essential construction equipment idling time to 3 minutes, which exceeds the legal requirement and achieves desired emissions reductions. (DRP 2017, pp. 5.11-79, 5.21-89)
Transportation Demand Management				
146	AG List, p. 12	Meet an identified transportation-related benchmark.	Yes	MM 10-25 requires implementation of the Project's Mobility Plan, which includes creation, funding, and ongoing operation of a Transportation Management Association (TMA) to implement ongoing transportation improvements and programs. (DRP 2017, pp. 5.10-152, -153) Per PDF 21-9, and MMs 10-25 and 10-26, the Project will require TMA implementation of a combination of transit and transportation-related measures to meet a specified performance standard, which is to reduce on-site single-occupancy vehicle use by 30 percent in relation to standard ITE-generation rates for the overall Project, and to reduce off-site peak hour commutes to and from the Project site in single-occupancy automobiles by 20 percent. (*Id.,* p. 5.21-66) Per the Centennial Mobility Plan, the TMA will adaptively manage compliance with the Centennial internal and external mobility performance standards by conducting transit mode surveys and other appropriate monitoring activities. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 10) Transportation Demand Management (TDM) measures will be implemented by the TMA required to meet the specified performance standard described above in this row. (*Ibid*.) Rather than proscribe the exact mixture of measures to be implemented at this early stage in Project development, pursuant to CEQA, the Project builds in flexibility by including a specific performance standard and a menu of potential measures for TMA consideration to achieve compliance. This is an appropriate approach for a large specific plan project with a diverse

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Row	Source	Measure	Included	Response
				mixture of uses and approximately 20-year buildout period, particularly because it will allow for the incorporation of new and emerging technologies over time, and given the lack of Project Applicant ability to control the actions of all on-site employers and their relationships with their employees. Accordingly, the TMA shall evaluate the feasibility and effectiveness of the TDM measures included in Mobility Plan Table 2-C-2 to ensure compliance with the specified performance standard, and these measures for consideration in Table 2-C-2 include many of the suggested measures contained below and discussed in rows 147 through 156 and 160 through 199. Transit mode surveys and other appropriate monitoring activities will be conducted to verify the effectiveness of any TDM measures implemented for the Project, and the monitoring and adaptive management process will be a continuing obligation of the TMA to verify compliance with the internal and external mobility performance standards. (*Ibid*.) To the extent any of the measures suggested in rows 147 through 156 and 160 through 199 are not included in the roster to consider in Table 2-C-2 or otherwise required of the Project, Table 2-C-2 has been revised below to add the potential measures as appropriate and feasible.
147	SMAQMD List, p. 10	Implement School Bus Program. Restore or expand school bus program or provide safe routes to school.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 13) The text included in Table 2-C-2 says: "Implement School Bus Program – that works with the school district to restore or expand school bus services in the project area and local community." (*Ibid*.) As noted above, a mitigation measure has also been added that will require a Safe Routes to School Program. See also the "School Pool Program" to be considered as a measure in Mobility Plan Table 2-C-2. (*Ibid.*)

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Row	Source	Measure	Included	Response
148	SJVAPCD List, p. 10	Implement school bus program (Restore or expand bus service in project area and local community by working with school districts)	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 13) The text included in Table 2-C-2 says: "Implement School Bus Program – that works with the school district to restore or expand school bus services in the project area and local community." (*Ibid*.) As noted above, a mitigation measure has also been added that will require a Safe Routes to School Program. See also the "School Pool Program" to be considered as a measure in Mobility Plan Table 2-C-2. (*Ibid*.)
149	SJVAPCD List, p. 10	Implement compressed work week schedule (e.g., 4/40, 9/80, 3/36); (Consult with employees prior to program implementation) Implement home-based telecommuting program (Participation increased if employer provides/assists with provision of equipment like modem, computer, etc.; Especially effective if employee commute trips are long).	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017. Appendix 2-A to Appendix 4.0-A, p. 12.) The text included in Table 2-C-2 says: "Telecommuting and Alternative Work Schedules – will allow residents within a community to either work from home or only have to be at work four days instead of five." (*Ibid*.) Technology-oriented infrastructure will also be available throughout the community and cater to the growing number of companies and employees who are no longer dependent on physical proximity to business markets, natural resources, or transit. Advanced information and communication services utilizing fiber-optic line, wireless technology, or other forthcoming technology infrastructure will enable employers, particularly corporate headquarters, employees, and the self-employed to locate in Centennial based on its "connection" to the larger region. (*Id.,* Appendix 4.0-A, p. 1-5) Per MM 10-1, the Project shall provide internet infrastructure and a community intranet with access for homeowners associations; interest groups; local event scheduling; schools, library, carpool and transit services; and other on-site entertainment and amenities for residential land uses. The internet and intranet will reduce the need for people to use automobile travel to obtain the information that is provided by both. (*Id.,* p. 5.10-144) To accommodate residents during their commuting downtime, each transit center will also offer free wifi connections. (*Id.,* Appendix 4.0-A, p. 3-2) The Centennial Technology Plan requires the Master Developer

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Row	Source	Measure	Included	Response
				to engage providers of integrated systems of technology and communication services to provide world-class, customer-driven communications, entertainment, and home and business automation services. For residential and commercial buildings, both wired and wireless technologies will be considered, leveraging the unique strengths and qualities of each. Cost-efficient, market-driven solutions will be pursued for both residential and commercial services. (*Id.,* p. 3-64) The Master Developer is required to prepare a Wireless Community Master Plan that is consistent with the goals and policies of the Specific Plan. The Plan must be prepared in cooperation with one or more wireless service providers, demonstrate emergency coverage, and include preferred sites and designs for wireless facilities for a defined geographic area within the Specific Plan Boundaries. (*Id.,* pp. 3-64, -65)
150	SLOAPCD List, p. 3-19	Implement compressed work schedules (i.e., 9–80s or 4–10s).	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 12.) See row 149 for further discussion.
151	SLOAPCD List, p. 3-19	Implement a telecommuting program.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 12.) See row 149 for further discussion.
152	SLOAPCD List, p. 3-20	Develop satellite work sites.	Yes – Functional Equivalent Required	The Project includes features that would allow for work without travel out of the Project site, as discussed below. Technology-oriented infrastructure will be available throughout the community and cater to the growing number of companies and employees who are no longer dependent on physical proximity to business markets, natural resources, or transit. Advanced information and communication services utilizing fiber-optic line, wireless technology, or other forthcoming technology infrastructure will enable employers, particularly corporate headquarters, employees, and the self-employed to locate in Centennial based on its "connection" to the larger region. (DRP 2017, Appendix 4.0-A, p. 1-5) Per MM 10-1, the Project shall provide internet infrastructure and a community intranet with access

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Row	Source	Measure	Included	Response
				for homeowners associations; interest groups; local event scheduling; schools, library, carpool and transit services; and other on-site entertainment and amenities for residential land uses. The internet and intranet will reduce the need for people to use automobile travel to obtain the information that is provided by both. (*Id.,* p. 5.10-144) To accommodate residents during their commuting downtime, each transit center will also offer free wifi connections. (*Id.,* Appendix 4.0-A, p. 3-2) The Centennial Technology Plan requires the Master Developer to engage providers of integrated systems of technology and communication services to provide world-class, customer-driven communications, entertainment, and home and business automation services. For residential and commercial buildings, both wired and wireless technologies will be considered, leveraging the unique strengths and qualities of each. Cost-efficient, market-driven solutions will be pursued for both residential and commercial services. (*Id.,* p. 3-64) The Master Developer is required to prepare a Wireless Community Master Plan that is consistent with the goals and policies of the Specific Plan. The Plan must be prepared in cooperation with one or more wireless service providers, demonstrate emergency coverage, and include preferred sites and designs for wireless facilities for a defined geographic area within the Specific Plan Boundaries. (*Id.,* pp. 3-64, -65)
153	BAAQMD List, p. 4-13	<u>Telecommuting:</u> 1) Employee telecommuting program 2) Compressed work schedule 3/36 3) Compressed work schedule 4/40 4) Compressed work schedule 9/80	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 12.) See row 149 for further discussion. See also row 152 regarding telecommuting.

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Row	Source	Measure	Included	Response
154	SMAQMD List, p. 10	Encourage Telecommuting and Alternative Work Schedules. Allow/require 9/80s, 4/10, and telecommuting	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 12.) See row 149 for further discussion. See also row 152 regarding telecommuting.
155	AG List, p. 15	Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation.	Yes – Functional Equivalent Required	The Project will include communication capabilities and potential TMA measures that allow employees to attend meetings without requiring travel. See rows 149 and 152 for further discussion.
156	SLOAPCD List, p. 3-20	Include teleconferencing capabilities, such as web cams or satellite linkage, which will allow employees to attend meetings remotely without requiring them to travel out of the area.	Yes – Functional Equivalent Required	The Project will include communication capabilities and potential TMA measures that allow employees to attend meetings without requiring travel. See rows 149 and 152 for further discussion.
157	SLOAPCD List, p. 3-20	Provide free-access telework terminals and/or wi-fi access in multi-family projects.	Yes	Technological advances such as wifi connectivity have become part of everyday life via smart phones, tablets, computers and the like. Being "connected" has become a necessity for businesses and residents. The technology vision for Centennial is to connect the community, businesses, and homes with advanced but economically feasible infrastructure and services that are seamless, transparent, and easy to use. Just like infrastructure needs such as water and sewer utilities, services such as internet and telecom will be available to residents and businesses from day one and will continue to be connected through each phase of development. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 3-64)
158	SLOAPCD List, p. 3-17	Provide onsite housing for employees.	Yes	The Project provides up to 19,333 dwelling units and approximately 7,363,818 square feet of Business Park uses and 1,034,550 square feet of Commercial uses, with 1,568,160 square feet of Institutional/Civil land uses. This would provide on-site housing and employment within the same Project.

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Row	Source	Measure	Included	Response
159	SJVAPCD List, p. 9	Provide preferential parking (e.g., near building entrance, sheltered area, etc.) for carpool and vanpool vehicles and provide signage (Most effective if parking supply is limited and/or located far from building entrance)	Yes	Per MM 21-17, preferential parking for low-emitting, fuel-efficient, and carpool/vanpool vehicles shall be provided as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code. (DRP 2017, pp. 5.21-91, -92) Per MM 11-4 (as updated in response to Comment F.8-95), it shall be as follows: two for 10 to ~~15~~ 25 spaces; four for 26 to 50 spaces; six for 51 to 75 spaces; nine for 76 to 100 spaces; eleven for 101 to 150 spaces; 18 for 151 to 200 spaces; and at least 10 percent of total for 201 and more spaces. (*Id.,* p. 5.11-79)
160	SMAQMD List, p. 10	Workplace Parking Charge. Charge employees for their parking.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, pp. 11, 13) The language of the measures is as follows: • Parking Policy/Pricing Measures changes the parking requirements and supply within the project site to encourage alternative transportation choices by residents and employees. Examples include reducing the minimum/maximum amount of parking spots, shared parking and cost of parking by time of day. By having limited parking, along with the cost of parking and fuel, people are encouraged to use public transit, bike or walk, thereby reducing vehicle trips. (*Id.,* p. 11) • Implement Market Price Public Parking (On-Street) – is a strategy that assigns a cost to parking at areas with employment or at shopping centers where parking demand is high and encourages people to "park once" and walk to all destinations. Vehicle trips are reduced from people parking once and encourage people to use public transit to avoid parking costs. (*Ibid*.) • Price Workplace Parking – at employment centers that may include charging employee parking, high-cost parking, validating parking only for invited guests, providing allowances for using the bus, and education on alternatives. The price drives employees to consider

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Row	Source	Measure	Included	Response
				alternative modes for their work commute thereby reducing traffic volumes. (*Id.,* p. 13)
161	SJVAPCD List, p. 13	Develop and implement parking pricing strategies, such as charging parking lot fees to low occupancy (single occupant vehicles) vehicles, implement workplace parking at its employee centers, or increase the on-street public parking.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, pp. 11, 13) The language of the measures is contained in row 160.
162	SJVAPCD List, p. 9	Implement parking fees for single occupancy vehicle commuters (Reduced or waived fees for carpools and vanpools; Complemented by transit, ridesharing programs; other commute alternatives; Revenues used to support commute alternatives; Provisions in place to avoid off-site parking spillover)	Yes – Functional Equivalent Required	This measure is reflected in transportation and vehicle demand measures included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, pp. 11-12, 15) • Preferential parking or parking subsidies for carpoolers – at convenient locations near bus stops or building front doors, given to people with three or more employees car-pooling, van-pooling or using ride-share to commute to work. This program encourages commuters to find another way to work besides a personal vehicle, thereby reducing traffic volumes on the roadway. (*Id.,* p. 15) • Implement Preferential Parking Permit Program – that provides special parking at convenient locations near bus stops or in front of building doors, given to employees car-pooling, van-pooling or using ride-share to commute to work. This program encourages commuters to find another way to work besides a personal vehicle, thereby reducing traffic volumes. (*Id.,* p. 12) • Implement Voluntary Commute Trip Reduction (CTR) Programs – with employers to discourage employees from using their personal vehicle and instead carpool, ride-share, take the bus, walk or bike. CTR provides assistance through ride-matching, special parking spots, and flexible work hours. Traffic volume is reduced by encouraging other ways to get to work besides a personal vehicle. (*Id.,* p. 11)

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Row	Source	Measure	Included	Response
				• Implement Mandatory CTR Programs – through an ordinance with the intent to reduce the number of people driving alone and encourage carpooling, taking the bus, walking or biking. The program requires established performance standards, implementation and regular monitoring and reporting. Traffic volume is reduced by encouraging other ways to get to work besides a personal vehicle. (*Id.,* p. 12) The following potential measure is also added to Table 2-C-2: • **Single-Occupancy Vehicle Parking Charge: Vehicle Parking Charge** - Implement parking fees for single occupancy vehicle commuters, with reduced or waived fees for car-pools and van-pools.
163	SMAQMD List, p. 10	Implement Employee Parking "Cash-Out"	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 13) The language of the measures is as follows: "Implement Employee Parking "Cash-Out" – where employers offer their employee parking "cash-out" that gives an employee a choice of forgoing their current free parking for a cash payment equivalent to the cost of the parking space to the employer. The price drives employees to consider alternative modes for their work commute thereby reducing traffic volumes." (*Ibid*.)
164	SJVAPCD List, p. 9	Implement parking cash-out program for employees (i.e., nondriving employees receive transportation allowance equivalent to value of subsidized parking; Complemented by transit, ridesharing programs, other commute alternative; Implement at worksites not subject to state parking cash-out requirements; Tax benefits if travel allowance offered as	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 13) The language of the measures is provided in row 163.

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Row	Source	Measure	Included	Response
		transit/ridesharing subsidy; and Provisions in place to avoid off-site parking spillover)		
165	CAPCOA List, p. B-7	Paid Parking (Parking Cash Out): Project provides employee and/or customer paid parking system. Project must have a permanent and enforceable method of maintaining user fees for all parking facilities. The facility may not provide customer or employee validations. Daily charge for parking must be equal to or greater than the cost of a transit day/monthly pass plus 20 percent.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 13) The language of the measures is provided in row 163. The following language is hereby added to the measure as follows: "Implement Employee Parking "Cash-Out" – where employers offer their employee parking "cash-out" that gives an employee a choice of forgoing their current free parking for a cash payment equivalent to the cost of the parking space to the employer. The price drives employees to consider alternative modes for their work commute thereby reducing traffic volumes. Consider requiring that the facility may not provide customer of employee validations, and/or requiring that the daily charge for parking must be equal to or greater than the cost of a transit day/monthly pass plus 20 percent"
166	BAAQMD List, p. 4-13	Transportation Demand Management Parking, Transit Passes: 1) Daily parking charge 2) Parking cash-out 3) Free transit passes	Yes – Functional Equivalent Required	1) This is a potential TMA measure included in Mobility Plan Table 2-C-2 – see rows 160 through 162. 2) This is a potential TMA measure included in Mobility Plan Table 2-C-2 – see rows 163 through 165. 3) This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 12) • Implement Subsidized or Discounted Transit Program – that would partially or wholly cover the costs of daily or monthly public transit (i.e., bus) passes and may also include free transfers between stations. Traffic volume is reduced by encouraging public transit as opposed to a personal vehicle. (*Ibid*.)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
167	CAPCAO List, p. B-8	Minimum Parking**:** Provide minimum amount of parking required. Once land uses are determined, the trip reduction factor associated with this measure can be determined by utilizing the ITE parking generation publication. The reduction in trips can be computed as shown below by the ratio of the difference of minimum parking required by code and ITE peak parking demand to ITE peak parking demand for the land uses multiplied by 50 percent. Percent Trip Reduction = 50 * [(min parking required by code – ITE peak parking demand)/ (ITE peak parking demand)]	Yes – Functional Equivalent Required	The Project will provide a framework for a community-wide parking plan that is based only on parking demand and need. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 14) Potential parking supply reductions are also accounted for in transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 11) • Parking Policy/Pricing. Measures changes the parking requirements and supply within the project site to encourage alternative transportation choices by residents and employees. Examples include reducing the minimum/maximum amount of parking spots, shared parking and cost of parking by time of day. By having limited parking, along with the cost of parking and fuel, people are encouraged to use public transit, bike or walk, thereby reducing vehicle trips. (*Ibid*.) • Limit Parking Supply – changes parking requirements and supply within the project site such as reducing the minimum and creating a maximum amount of parking spots. The limited areas to park, along with the cost of parking and fuel, encourage people to change from personal vehicle to public transit, bicycling and walking, thereby reducing vehicle trips. (*Ibid*.)
168	CAPCOA List, p. B-9	Parking Reduction Beyond Code/Shared Parking**:** Provide parking reduction less than code. This measure can be readily implemented through a shared parking strategy, wherein parking is utilized jointly among different land uses, buildings, and facilities in an area that experience peak parking needs at different times of day and day of the week.	Yes – Functional Equivalent Required	The Project will provide parking based on need and demand, and incorporates these measures into the list of potential measures considered by the TMA to meet performance standards. See row 167.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
169	SLOAPCD List, p. 3-18	Parking space reduction to promote bicycle, walking, and transit use.	Yes – Functional Equivalent Required	The Project will provide parking based on need and demand, and incorporates these measures into the list of potential measures considered by the TMA to meet performance standards. See row 167.
170	SMAQMD List, p. 10	Limit Parking Supply. Parking supply below ITE rates.	Yes – Functional Equivalent Required	The Project will provide parking based on need and demand, and incorporates these measures into the list of potential measures considered by the TMA to meet performance standards. See row 167.
171	SMAQMD List, p. 10	Unbundle Parking Costs. Parking cost separate from property costs.	Yes – Functional Equivalent Required	This measure is hereby added to the measures for TMA consideration to meet mobility performance standards, as laid out in Table 2-C-2, as follows: **Unbundle Parking Costs** - Separate parking costs from property costs, requiring those who wish to purchase parking to do so at an additional cost from the property cost.
172	SJVAPCD List, p. 10	Unbundle parking costs from property costs (Separate parking from property costs to requiring those who wish to purchase parking spaces to do so at an additional cost from the property cost. This removes the burden from those who do not wish to utilize a parking space)	Yes – Functional Equivalent Required	This measure has been added to Table 2-C-2 of the Project's Mobility Plan, as laid out in row 171.
173	SJVAPCD List, p. 10	Implement market price public parking on street (Implement pricing strategy for parking by pricing all central business district/employment center/retail center on street parking. It will be priced to encourage 'park once' behavior. The benefit of this measure above that of paid parking at the project only is that it deters parking spillover from project-supplied parking to other public parking nearby, which undermine the	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 13) The language of the measures is as follows: • Implement Market Price Public Parking (On-Street) – is a strategy that assigns a cost to parking at areas with employment or at shopping centers where parking demand is high and encourages people to "park once" and walk to all destinations. Vehicle trips are reduced from people parking once and encourage people to use public transit to avoid parking costs. (*Ibid*.)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
		vehicle miles traveled benefits of project parking.)		
174	SMAQMD List, p. 10	On-Street Parking Market Pricing. On-street parking utilizes market-rate pricing (such as meters)	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 13) The language of the measures is as follows: Implement Market Price Public Parking (On-Street) – is a strategy that assigns a cost to parking at areas with employment or at shopping centers where parking demand is high and encourages people to "park once" and walk to all destinations. Vehicle trips are reduced from people parking once and encourage people to use public transit to avoid parking costs. (*Ibid*.)
175	2008 OPR p. 20	Develop shuttle systems around business district parking garages to reduce congestion and create shorter commutes.	Yes – Functional Equivalent Required	The Project will explore options to provide a ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. (DRP 2017, Appendix 4.0-A, p. 3-6; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 9) Potential shuttle measures are also included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 13, 14), as follows: • Provide Employer-Sponsored Vanpool/ Shuttle – that provides employees a ride to work through van pool and shuttles commuters to nearby transit stations and shopping centers. This program provides commuter another option to get to work besides a personal vehicle, thereby reducing traffic volumes. (*Id.,* p. 13) • Provide Local Shuttles – through coordination with the local transit operator that will provide shuttles to stations, shopping centers and homes. By providing reliable connections people are encouraged to use public transit, bike or walk, thereby reducing vehicle trips. (*Id.,* p. 14)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
176	SJVAPCD List, p. 8	Shuttle Operational Mitigation Measures: Establish mid-day shuttle service from worksite to food service establishments/commercial areas. Provide shuttle service to transit stations/multimodal centers.	Yes – Functional Equivalent Required	The Project will explore options to provide a ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. (DRP 2017, Appendix 4.0-A, p. 3-6; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 9) Potential shuttle measures are also included on the roster of TMA measures for the Project, as indicated in Table 2-C- in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 13, 14) The text of such potential measures in included in row 175.
177	SJVAPCD List, p. 15	Operation of a shuttle bus to shopping, heath care, public service sites, etc. to reduce automobile use.	Yes – Functional Equivalent Required	The Project will explore options to provide a ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. (DRP 2017, Appendix 4.0-A, p. 3-6; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 9) Potential shuttle measures are also included on the roster of TMA measures for the Project, as indicated in Table 2-C- in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 13, 14) The text of such potential measures in included in row 175.
178	SJVAPCD List, p. 14	Provide an employer subsidized shuttle service to connect to existing transit sites.	Yes – Functional Equivalent Required	The Project will explore options to provide a ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. (DRP 2017, Appendix 4.0-A, p. 3-6; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 9) Potential shuttle measures are also included on the roster of TMA measures for the Project, as indicated in Table 2-C- in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 13, 14) The text of such potential measures in included in row 175.
179	SMAQMD List, p. 10	Employee Vanpool/Shuttle. Provide employer-sponsored vanpool or shuttle program	Yes – Functional Equivalent Required	The Project will explore options to provide a ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. (DRP 2017, Appendix 4.0-A, p. 3-6; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 9) Potential shuttle measures are also included on the roster of TMA measures for the Project, as indicated in Table 2-C- in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 13, 14) The text of such potential measures in included in row 175.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
180	SLOAPCD List, p. 3-19	Provide vanpool, shuttle, mini bus service (alternative fueled preferred).	Yes – Functional Equivalent Required	The Project will explore options to provide a ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. (DRP 2017, Appendix 4.0-A, p. 3-6; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 9) Potential shuttle measures are also included on the roster of TMA measures for the Project, as indicated in Table 2-C- in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 13, 14) The text of such potential measures in included in row 175.
181	SLOAPCD List, p. 3-19	Implement a lunchtime shuttle to reduce single occupant vehicle trips.	Yes – Functional Equivalent Required	The Project will explore options to provide a ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. (DRP 2017, Appendix 4.0-A, p. 3-6; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 9) Potential shuttle measures are also included on the roster of TMA measures for the Project, as indicated in Table 2-C- in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 13, 14) The text of such potential measures in included in row 175.
182	AG List, p. 13	Provide public transit incentives such as free or low-cost monthly transit passes to employees, or free ride areas to residents and customers.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 12) Implement Subsidized or Discounted Transit Program – that would partially or wholly cover the costs of daily or monthly public transit (i.e., bus) passes and may also include free transfers between stations. Traffic volume is reduced by encouraging public transit as opposed to a personal vehicle. (*Ibid*.)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
183	SLOAPCD List, p. 3-19	Provide incentives (e.g., bus pass, "Lucky Bucks", etc.) to employees to carpool/vanpool, take public transportation, telecommute, walk bike, etc.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 12) Implement Subsidized or Discounted Transit Program – that would partially or wholly cover the costs of daily or monthly public transit (i.e., bus) passes and may also include free transfers between stations. Traffic volume is reduced by encouraging public transit as opposed to a personal vehicle. (*Ibid*.)
184	SJVAPCD List, p. 14	Provide incentives to employees to carpool/vanpool, take public transportation, telecommute, walk, bike, etc.	Yes – Functional Equivalent Required	Subsidized or discounted transit passes are a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 12) "Implement Subsidized or Discounted Transit Program – that would partially or wholly cover the costs of daily or monthly public transit (i.e., bus) passes and may also include free transfers between stations. Traffic volume is reduced by encouraging public transit as opposed to a personal vehicle." (*Ibid*.) Many other measures in Mobility Plan Table 2-C-2 encourage carpool/vanpool use, public transportation use, telecommuting, walking, biking, etc., as discussed in rows 160 through 199.
185	SMAQMD List, p. 10	Transit Subsidy. Proponent subsidizes sustainable modes of transportation.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 12) Implement Subsidized or Discounted Transit Program – that would partially or wholly cover the costs of daily or monthly public transit (i.e., bus) passes and may also include free transfers between stations. Traffic volume is reduced by encouraging public transit as opposed to a personal vehicle. (*Ibid*.)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
186	SJVAPCD List, p. 14	Participate in an employee "flash-pass" program, which provides free travel on transit buses.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 12) Implement Subsidized or Discounted Transit Program – that would partially or wholly cover the costs of daily or monthly public transit (i.e., bus) passes and may also include free transfers between stations. Traffic volume is reduced by encouraging public transit as opposed to a personal vehicle. (*Ibid*.)
187	SJVAPCD List, p. 14	Provide transit pass subsidy (100 percent) and/or commute alternative allowance.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 12) Implement Subsidized or Discounted Transit Program – that would partially or wholly cover the costs of daily or monthly public transit (i.e., bus) passes and may also include free transfers between stations. Traffic volume is reduced by encouraging public transit as opposed to a personal vehicle. (*Ibid*.)
188	SMAQMD List, p. 10	Market Commute Trip Reduction Option. Market sustainable travel options.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 12) The language is as follows: "Implement Commute Trip Reduction Marketing – involves educating the public and sharing information on carpooling, van-pooling, ride-sharing and public transit through new employee orientations, event promotions, and publications. The marketing reduces traffic volumes by encouraging other ways to get to work in place of a personal vehicle." (*Ibid*.)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
189	SLOAPCD List, p. 3-19	Provide bicycle-share program for development.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 13). Measure language is as follows: "Implement Bike-Sharing Program – that includes stations/kiosk at regular intervals throughout the project with the number of bike stations increasing around shopping centers and transit stations. Traffic volumes are reduced by encouraging bicycling as opposed to a personal vehicle." (*Ibid*.)
190	SMAQMD List, p. 10	Provide Ride Sharing Program. Establish and carpooling program with associated infrastructure.	Yes – Functional Equivalent Required	Relevant TMA activities include supporting the formation of vanpools/carpools and rideshare matching databases. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 10) Such measures are included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 12-13, 16) Measure language is as follows: • Provide Ride-Sharing Programs (e.g. Uber Pool, Lyft Line) – that gives people a way to commute to work besides their personal vehicle by the sharing of a vehicle and costs with other people headed in the same direction. Traffic volume is reduced by encouraging carpooling and rideshare passengers tend to have relatively long commutes which reduce more vehicle miles because the trips that are reduced are twice as long on average. (*Id.,* p. 12) • Implement Car-Sharing Program (e.g. Zipcar, Car2Go) – either residential-based or employer-based programs that allow people to have on-demand access to shared vehicles, with costs determined through mileage or hourly rates with deposits or annual membership fees. Both residential and employer-based programs encourage carpooling and therefore reduce traffic volumes. (*Id.,* p. 13) • Implement School Pool Program – similar to a ride-sharing program for school children and differs from bussing services to public schools since the program helps match parents to take students to private schools, or to schools where students cannot

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				walk or bike but do not meet the requirements for bussing. Traffic volume is reduced by encouraging parents to share their vehicle. (*Ibid*.) • Ridesourcing [or Transportation Network Companies (TNC)] (e.g. Uber, Lyft) arranges rides for passengers with drivers that use their privately-owned vehicle for a fee and can provide rides to and from stations and help with first/last mile situations. Ridesourcing helps reduce vehicle trips by providing a different way to get to the destination besides a personal vehicle. (*Id.,* p. 16)
191	SJVAPCD List, p. 7 (and p. 14)	Rideshare Operational Mitigation Measures**:** Implement carpool/vanpool program e.g., carpool ridematching for employees, assistance with vanpool formation, provision of vanpool vehicles, etc. Limited parking supply and/or implementation of parking fees or parking cash-out	Yes – Functional Equivalent Required	Relevant TMA activities include supporting the formation of vanpools/carpools and rideshare matching databases. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 10) Such measures are included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 12-13, 16) Measure language is included in row 190.
192	2008 OPR p. 20	Create an online ridesharing program that matches potential carpoolers immediately through email.	Yes – Functional Equivalent Required	Relevant TMA activities include supporting the formation of vanpools/carpools and rideshare matching databases. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 10) Such measures are included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 12-13, 16) Measure language is included in row 190.
193	AG List, p. 16	Create a ride sharing program. Promote existing ride sharing programs e.g., by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles, and providing a web site or message board for coordinating rides.	Yes – Functional Equivalent Required	Relevant TMA activities include supporting the formation of vanpools/carpools and rideshare matching databases. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 10) Such measures are included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 12-13, 16) Measure language is included in row 190.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
194	AG List, p. 16	Provide a vanpool for employees.	Yes – Functional Equivalent Required	The Project will explore options to provide a ride-share program, on demand pick up, shuttle service or similar methods to employment, commercial and residential areas of Centennial. (DRP 2017, Appendix 4.0-A, p. 3-6; *Id.,* Appendix 2-C to Appendix 4.0-A, p. 9) Potential shuttle measures are also included on the roster of TMA measures for the Project, as indicated in Table 2-C- in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 13, 14), as follows: • Provide Employer-Sponsored Vanpool/ Shuttle – that provides employees a ride to work through van pool and shuttles commuters to nearby transit stations and shopping centers. This program provides commuter another option to get to work besides a personal vehicle, thereby reducing traffic volumes. (*Id.,* p. 13) • Provide Local Shuttles – through coordination with the local transit operator that will provide shuttles to stations, shopping centers and homes. By providing reliable connections people are encouraged to use public transit, bike or walk, thereby reducing vehicle trips. (*Id.,* p. 14)
195	Ag List, p. 16	Create or accommodate car sharing programs, e.g., provide parking spaces for car share vehicles at convenient locations accessible by public transportation.	Yes – Functional Equivalent Required	This measure is a transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 13). The measure language is as follows: • Implement Car-Sharing Program (e.g. Zipcar, Car2Go) – either residential-based or employer-based programs that allow people to have on-demand access to shared vehicles, with costs determined through mileage or hourly rates with deposits or annual membership fees. Both residential and employer-based programs encourage carpooling and therefore reduce traffic volumes. (*Id.,* p. 13)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
196	AG List, p. 12	Adopt a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation	Yes – Functional Equivalent Required	The Project will provide a framework for a community-wide parking plan that is based only on parking demand and need. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 14) Potential parking supply reductions are also accounted for in transportation and vehicle demand measure included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 11) Potential TMA measures include a wide array of parking-related measures described in this group of measures 160-199.
197	SJVAPCD List, p. 5	VMT Infrastructure-Based Mitigation Measures Provide park and ride lots and/or satellite telecommuting centers Market commute trip reduction options.	Yes – Functional Equivalent Required	The Project includes features that would allow for work without travel out of the Project site, as discussed below. Technology-oriented infrastructure will be available throughout the community and cater to the growing number of companies and employees who are no longer dependent on physical proximity to business markets, natural resources, or transit. Advanced information and communication services utilizing fiber-optic line, wireless technology, or other forthcoming technology infrastructure will enable employers, particularly corporate headquarters, employees, and the self-employed to locate in Centennial based on its "connection" to the larger region. (DRP 2017, Appendix 4.0-A, p. 1-5) Per MM 10-1, the Project shall provide internet infrastructure and a community intranet with access for homeowners associations; interest groups; local event scheduling; schools, library, carpool and transit services; and other on-site entertainment and amenities for residential land uses. The internet and intranet will reduce the need for people to use automobile travel to obtain the information that is provided by both. (*Id.,* p. 5.10-144) To accommodate residents during their commuting downtime, each transit center will also offer free wifi connections. (*Id.,* Appendix 4.0-A, p. 3-2) The Centennial Technology Plan requires the Master Developer to engage providers of integrated systems of technology and communication services to provide world-class, customer-driven communications, entertainment, and home and business automation services. For residential and commercial buildings, both wired and wireless technologies will be considered, leveraging the unique strengths and qualities of each. Cost-efficient, market-driven solutions will be pursued for both residential and commercial services. (*Id.,* p. 3-

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				64) The Master Developer is required to prepare a Wireless Community Master Plan that is consistent with the goals and policies of the Specific Plan. The Plan must be prepared in cooperation with one or more wireless service providers, demonstrate emergency coverage, and include preferred sites and designs for wireless facilities for a defined geographic area within the Specific Plan Boundaries. (*Id.,* pp. 3-64, -65) The marketing of trip reduction options is also included as a potential TMA measures in Mobility Plan Table 2-C-2, as follows: "Implement Commute Trip Reduction Marketing – involves educating the public and sharing information on carpooling, van-pooling, ride-sharing and public transit through new employee orientations, event promotions, and publications. The marketing reduces traffic volumes by encouraging other ways to get to work in place of a personal vehicle." (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 12)
198	SLOAPCD List, p. 3-19	On-site eating, refrigeration, and food vending facilities	Yes – Functional Equivalent Required	The following is hereby added to the potential TMA measures to meet performance standards as provided in Mobility Plan Table 2-C-2: **Employee Meal Facilities** - Provide on-site eating, refrigeration, and food vending facilities.
199	SLOAPCD List, p. 3-20	If the development is or contains a grocery store or large retail facility, provide customers home delivery service in clean fueled vehicles.	Yes – Functional Equivalent Required	The following is hereby added to the potential TMA measures to meet performance standards as provided in Mobility Plan Table 2-C-2: **Delivery Services** - Consider providing grocery and large retail store customers with home delivery service in clean fueled vehicles.
200	SLOAPCD List, p. 3-19	For large developments, provide day care facility on site.	Yes	Group day care facilities for 6 or less people are permitted in all residential land use designations, and for 7 or more people, are permitted with a conditional use permit in the MDR, HDR, VHDR, and MU designations. Both types are permitted with a conditional use permit in the I/C designation. (DRP 2017, Appendix 4.0-A, p. 2-45)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
201	CAPCOA List, p. B-14	Services Operational**:** Project provides on-site shops and services for employees.	Yes	The Project will include on-site retail and services that would serve employees at the Project. The Project provides for a variety of retail and other commercial uses, and has a goal that an 80 percent average, but no less than 50 percent, of all project dwelling units shall be located within a ½ mile walking distance of a Village Core or the Town Center. (DRP 2017 p. 4-34; *Id.,* Appendix 4.0-A, p. 3-3) The Project's circulation network, including the extensive network of sidewalks, greenway trails, and community trails, will link residential, schools, shopping, and employment areas for easy and safe access for pedestrians and bicyclists. (*Id.,* p. 4-34)
202	SJVAPCD List, p. 7	Services Operational Mitigation Measures: 1) Provide on-site shops and services for employees such as cafeteria, bank/ATM, dry cleaners, convenience market, etc. 2) Provide on-site childcare, or contribute to off-site child care within walking distance.	Yes	1. The Project will include on-site retail and services that would serve employees at the Project. The Project provides for a variety of retail and other commercial uses, and has a goal that an 80 percent average, but no less than 50 percent, of all project dwelling units shall be located within a ½ mile walking distance of a Village Core or the Town Center. (DRP 2017, p. 4-34; *Id.,* Appendix 4.0-A, p. 3-3) The Project's circulation network, including the extensive network of sidewalks, greenway trails, and community trails, will link residential, schools, shopping, and employment areas for easy and safe access for pedestrians and bicyclists. (*Id.,* p. 4-34) 2. Group day care facilities for 6 or less people are permitted in all residential land use designations, and for 7 or more people, are permitted with a conditional use permit in the MDR, HDR, VHDR, and MU designations. Both types are permitted with a conditional use permit in the I/C designation. (*Id.,* Appendix 4.0-A, p. 2-45)

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
203	BAAQMD List, p. 4-13	Other Transportation Demand Measures: 1) Secure Bike Parking (at least 1 space per 20 vehicle spaces) 2) Showers/Changing Facilities Provided 3) Guaranteed Ride Home Program Provided 4) Car-Sharing Services Provided 5) Information Provided on Transportation Alternatives (Bike Schedules, Maps) 6) Dedicated Employee Transportation Coordinator 7) Carpool matching program 8) Preferential carpool/vanpool parking	Yes, and/or Functional Equivalent Required	1-2. The Project meets these requirements, as discussed in bicycle infrastructure rows 94 through 102. 3, 4, 7, 8. Functionally equivalent measures will be implemented by the TMA as necessary to meet articulated mobility performance standards, as discussed in more detail in rows 146 through 156 and 160 through 199. Specifically, with regard to these suggested measures: • Mobility Plan Table 2-C-2 includes a measure for a guaranteed ride home program, as follows: "Promotion and expansion of Guaranteed Ride Home program provides transportation for carpoolers and transit users in emergency situations. Providing a reliable service for emergency situations encourages carpooling and reduces traffic volumes. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 15) • Car-sharing and carpooling service measures are also provided in Mobility Plan Table 2-C-2, as discussed in rows 190 through 195. • Preferential carpool/vanpool parking measures are also provided in Mobility Plan Table 2-C-2, as discussed in row 162. MM 21-17 also requires that non-residential buildings shall have preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles. (*Id.,* pp. 5.21-91, -92) 5. It would also be the responsibility of the TMA to provide transit route maps and schedules. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 10) 6. The TMA is responsible for and will regularly monitor programs to provide transit fare media for all transit service providers and ends users, developing transit affordability measures and/or incentives, and requiring employee commute reduction programs for employers with 250 or more employees. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 10) The potential TMA measures to meet articulated performance standards also include a variety of programs to reduce employee commute trips, as addressed in rows 146 through 156 and 160 through 199, above. The monitoring and adaptive management process will be a continuing

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
				obligation of the TMA to verify compliance with the Centennial internal and external mobility performance standards.
204	2008 OPR List, p. 18	Apply advanced technology systems and management strategies to improve operational efficiency of transportation systems and movement of people, goods and services.	Yes	Per the Centennial Mobility Plan, the TMA will adaptively manage compliance with the Centennial internal and external mobility performance standards expressed in MMs 10-25 and MM 10-26 and discussed in row 146 by conducting transit mode surveys and other appropriate monitoring activities. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 10) Transportation Demand Management (TDM) measures will implemented by the TMA required to meet the specified performance standard described above in this row. (Ibid.) Rather than proscribe the exact mixture of measures to be implemented at this early stage in Project development, pursuant to CEQA, the Project builds in flexibility by including a specific performance standard and a menu of potential measures for TMA consideration to achieve compliance. This is an appropriate approach for a large specific plan project with a diverse mixture of uses and approximately 20-year buildout period, particularly because it will allow for the incorporation of new and emerging technologies and management strategies over time.
205	SMAQMD List, p. 10	Implement Trip Reduction Program. TMA membership or other comprehensive services.	Yes	As discussed in the Centennial Green Development Program, the Master Developer shall establish a Transportation Management Association (TMA) that develops strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations in order to maximize transit efficiencies and services. The TMA's purpose is to coordinate and facilitate transit and rideshare usage to serve as many riders as possible, to promote multi-modal transportation services and options, and to reduce resident and employee use of single-occupancy automobiles for offsite commuting and for internal travel within the Specific Plan. Potential TDM measures to be implemented by the TMA to achieve articulated performance standards are addressed more fully in rows 146 through 156 and 160 through 199, above.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
206	CAPCOA List, p. B-12	TMA Membership**:** Include permanent TMA membership and funding requirement. Funding to be provided by Community Facilities District or County Service Area or other nonrevocable funding mechanism. TDMs have been shown to reduce employee vehicle trips up to 28 percent with the largest reductions achieved through parking pricing and transit passes. The impact depends on the travel alternatives.	Yes	As discussed in the Centennial Green Development Program, the Master Developer shall establish a Transportation Management Association (TMA) that develops strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations in order to maximize transit efficiencies and services. The TMA's purpose is to coordinate and facilitate transit and rideshare usage to serve as many riders as possible, to promote multi-modal transportation services and options, and to reduce resident and employee use of single-occupancy automobiles for offsite commuting and for internal travel within the Specific Plan. Potential TDM measures to be implemented by the TMA to achieve articulated performance standards are addressed more fully in rows 146 through 156 and 160 through 199, above.
207	SJVAPCD List, p. 14	Employ or appoint an Employee Transportation Coordinator to work with the TMA and the District.	Yes – Functional Equivalent Required	The TMA will work directly with local agencies and employers. TMA is responsible for and will regularly monitor programs to provide transit fare media for all transit service providers and ends users, developing transit affordability measures and/or incentives, and requiring employee commute reduction programs for employers with 250 or more employees. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 10) The potential TMA measures to meet articulated performance standards also include a variety of programs to reduce employee commute trips, as addressed in rows 146 through 156 and 160 through 199, above. The monitoring and adaptive management process will be a continuing obligation of the TMA to verify compliance with the Centennial internal and external mobility performance standards.

TABLE 3: VEHICULAR EMISSION REDUCTION MEASURES

Row	Source	Measure	Included	Response
208	2008 OPR p. 20	Encourage large businesses to develop commute trip reduction plans that encourage employees who commute alone to consider alternative transportation modes.	Yes	TMA activities include required employee commute reduction programs for employers with 250 or more employees. (DRP 2017, Appendix 2-C to Draft EIR Appendix 4.0-A, p. 10) The Project TDM program encourages ride-sharing and employer-sponsored vanpools, and will be managed by the TMA. (*Id.,* p. 5.21-77) The TMA's purpose is to coordinate and facilitate transit and rideshare usage to serve as many riders as possible. (*Ibid*.) It also includes formation of strategic partnerships with car sharing services (e.g., Uber or Lyft) and other innovation/technology approach to increase transportation efficiency. (*Ibid*.)
209	SLOAPCD List, p. 3-19	Implement a Transportation Choice Program to reduce employee commute trips. The applicant shall work with Rideshare for free consulting services on how to start and maintain a program.	Yes – Functional Equivalent Required	TMA activities include required employee commute reduction programs for employers with 250 or more employees. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 10) The potential TMA measures to meet articulated performance standards also include a variety of programs to reduce employee commute trips, as addressed in rows 146 through 156 and 160 through 199, above.

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
Heating and Cooling				
210	SLOAPCD List, p. 3-17	No residential wood burning appliances.	Yes	Per MM 11-3, The Project's plans and specifications shall prohibit wood-burning fireplaces as required by SCAQMD Rule 445 in single-family residences throughout the entire Project site, including at residences that are 3,000 or more feet above mean sea level at which the SCAQMD prohibition would otherwise not apply. Natural gas fireplaces shall be limited to a total of 13,954. (DRP 2017, p. 5.11-79) The Project must also otherwise comply with SCAQMD Rule 445 (Natural Gas Cooking Stoves and Fireplaces).
211	SMAQMD List, p. 10	Only Natural Gas Hearth. Project restricts hearths to Natural Gas Only. Or No Hearth. Project contains no hearths.	Yes	Per MM 11-3, The Project's plans and specifications shall prohibit wood-burning fireplaces as required by SCAQMD Rule 445 in single-family residences throughout the entire Project site, including at residences that are 3,000 or more feet above mean sea level at which the SCAQMD prohibition would otherwise not apply. Natural gas fireplaces shall be limited to a total of 13,954. (DRP 2017, p. 5.11-79) The Project must also otherwise comply with SCAQMD Rule 445 (Natural Gas Cooking Stoves and Fireplaces).
212	CAPCOA List, p. B-22	Wood Burning Fireplaces/Stoves**.** Project does not feature fireplaces or wood burning stoves.	Yes	Per MM 11-3, The Project's plans and specifications shall prohibit wood-burning fireplaces as required by SCAQMD Rule 445 in single-family residences throughout the entire Project site, including at residences that are 3,000 or more feet above mean sea level at which the SCAQMD prohibition would otherwise not apply. Natural gas fireplaces shall be limited to a total of 13,954. (DRP 2017, p. 5.11-79) The Project must also otherwise comply with SCAQMD Rule 445 (Natural Gas Cooking Stoves and Fireplaces).

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
213	SJVAPCD List, p. 14	Reduce Wood Burning Fireplaces and/or Woodstoves above that required by District Rule 4901.	Yes	Per MM 11-3, The Project's plans and specifications shall prohibit wood-burning fireplaces as required by SCAQMD Rule 445 in single-family residences throughout the entire Project site, including at residences that are 3,000 or more feet above mean sea level at which the SCAQMD prohibition would otherwise not apply. Natural gas fireplaces shall be limited to a total of 13,954. (DRP 2017, p. 5.11-79) The Project must also otherwise comply with SCAQMD Rule 445 (Natural Gas Cooking Stoves and Fireplaces).
214	CAPCOA List, p. B-22	Natural Gas Stove**.** Project features only natural gas or electric stoves in residences.	Yes	Per MM 11-3, The Project's plans and specifications shall prohibit wood-burning fireplaces as required by SCAQMD Rule 445 in single-family residences throughout the entire Project site, including at residences that are 3,000 or more feet above mean sea level at which the SCAQMD prohibition would otherwise not apply. Natural gas fireplaces shall be limited to a total of 13,954. (DRP 2017, p. 5.11-79) The Project must also otherwise comply with SCAQMD Rule 445 (Natural Gas Cooking Stoves and Fireplaces).
215	CAPCOA List, p. B.28	Solar Water Heaters**.** Project provides solar water heaters.	Yes	Uses associated with the Project are subject to appliance efficiency requirements for water heaters. (California Appliance Efficiency Regulations (Title 20 Standards), Sections 1605.1(f), 1605.3(f).) Consistent with the Los Angeles County Community Climate Action Plan, a minimum of 10 percent of all single-family detached residential units at Project buildout shall either include an installed solar water heater, tankless water heater, or other energy efficient water heater technology approved by the County. (DRP 2017, p. 5.21-74) Further, Single-family detached residential units with roof areas that are within 30 degrees of true south shall include plumbing appropriate for a solar water heating running from the installed water heater to the solar-ready roof areas, and those with roof areas that are not within 30 degrees of true south shall be plumbed to accommodate an on-demand tankless water heater. (*Ibid*.) Further, per MM 21-5, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that a minimum of 70 percent of public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. (*Id.,* p. 5.21-89) The

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				Centennial Green Development Program requires the use of removable covers for pools and spas, which are the functional equivalent on automatic covers with regard to efficiency. (*Id.,* Appendix 2.0-A to Appendix 4.0-A, p. 20) Automatic covers may result in accidental drownings or other injuries. Efficient pumps and motors for pools and spas are already required under applicable Building Energy Efficiency Standards.
216	SJVAPCD List, p. 11	Residential Water Heaters 1. Use solar or low-emission water heaters (beyond Rule 4902) 2. Use central water heaters Commercial Water Heaters 1. Use solar or low-emission water heaters 2. Use central water heating systems	Yes	Residential Water Heaters: Consistent with the Los Angeles County Community Climate Action Plan, the Project's Green Development Program requires that a minimum of 10 percent of all single-family detached residential units at Project buildout shall either include an installed solar water heater, tankless water heater, or other energy efficient water heater technology approved by the County. (DRP 2017, p. 5.21-74) Further, Single-family detached residential units with roof areas that are within 30 degrees of true south shall include plumbing appropriate for a solar water heating running from the installed water heater to the solar-ready roof areas, and those with roof areas that are not within 30 degrees of true south shall be plumbed to accommodate an on-demand tankless water heater. (*Ibid*.) Commercial Water Heaters: Per MM 21-5, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that a minimum of 70 percent of public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. (*Id.,* p. 5.21-89)
217	SLOAPCD List, p. 3-18	Utilize high efficiency gas or solar water heaters.	Yes	The Project provides for solar, tank-less, or other energy efficient water heater technology approved by the County. (DRP 2017, p. 5.21-74) See further discussion in rows 215 through 216.

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
218	BAAQMD List, p. 4-16	Install solar water heaters	Yes – Functional Equivalent Required	The Project provides for solar, tank-less, or other energy efficient water heater technology approved by the County. (DRP 2017, p. 5.21-74) See further discussion in rows 215 through 216.
219	BAAQMD List, p. 4-16	Install tank-less water heaters	Yes – Functional Equivalent Required	The Project provides for solar, tank-less, or other energy efficient water heater technology approved by the County. (DRP 2017, p. 5.21-74) See further discussion in rows 215 through 216.
220	AG List, p. 4	Use automatic covers, efficient pumps and motors, and solar heating for pools and spas.	Yes	Per MM 21-5, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that a minimum of 70 percent of public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. (DRP 2017, p. 5.21-89) The Centennial Green Development Program requires the use of removable covers for pools and spas, which are the functional equivalent on automatic covers with regard to efficiency. (*Id.,* Appendix 2.0-A to Appendix 4.0-A, p. 20) Automatic covers may result in accidental drownings or other injuries. Efficient pumps and motors for pools and spas are already required under applicable Building Energy Efficiency Standards. And Title 20 Standards.
221	AG List, p. 3	Use passive solar design, e.g., orient buildings and incorporate landscaping to maximize passive solar heating during cool seasons, minimize solar heat gain during hot seasons, and enhance natural ventilation. Design buildings to take advantage of sunlight.	Yes	Many of the streets in the Project will follow a general east-west orientation, providing optimal solar orientation, reducing energy demand and providing more shade on east-west streets to make them more enjoyable for pedestrians and cyclists. (DRP 2017, Appendix 4.0-A, p. M-6) The Project also takes advantage of natural cooling options by requiring the installation of operable windows designed to maximize natural ventilation by opening into prevailing west winds at inlets and away outlets, and installing operable clerestory windows for chimney effect cooling. Per the Centennial Green Development Program, the Project will incorporate passive solar design to reduce heat loads from glazing by strategically locating shade trees, trellises, awnings, exterior blinds, or shutters, to provide shading, and will increase air flow and reduce heat sinks at building entrances by, for example, including vegetation, water ponds, or fountains outside inlet openings to pre-cool

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				air flow into buildings. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20) It also incorporates deep overhangs. (*Id.,* Appendix 2-B to Appendix 4.0-A, p. 5)
222	SJVAPCD List, p. 11	Commercial Energy Efficiency 1. Orient Buildings to take advantage of solar heating and mineral cooling and use passive solar designs 2. Increase wall and attic insulation beyond [2012] Title 24 requirements	Yes	Since the SJVAPCD list was last updated in 2012, energy efficiency standards have been made more stringent by 2016 Title 24 requirements. For example, Title 24 standards set minimum energy-saving requirements for new buildings and renovations that will reduce energy used for lighting, heating, cooling, ventilation, and water heating, and the project is required to comply with these stringent more current building code requirements. Further, MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. (DRP 2017, p. 5.21-88) Similarly, MM 21-3 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (*Ibid*.) Specifically, with regard to the suggested measures here: 1. Many of the streets in the Project will follow a general east-west orientation, providing optimal solar orientation, reducing energy demand and providing more shade on east-west streets to make them more enjoyable for pedestrians and cyclists. (Draft EIR Appendix 4.0-A, p. M-6) The Project also takes advantage of natural cooling options by requiring the installation of operable windows designed to maximize natural ventilation by opening into prevailing west winds at inlets and away outlets, and installing operable clerestory windows for chimney effect cooling. Per the Centennial Green Development Program, the Project will incorporate passive solar design to reduce heat loads from glazing by strategically locating shade trees, trellises, awnings, exterior blinds, or shutters, to provide shading, and will increase air flow and reduce heat sinks at building entrances by, for example, including vegetation, water ponds, or fountains outside inlet openings to pre-cool air flow into buildings. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20) It

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				also incorporates deep overhangs. (*Id.,* Appendix 2-B to Appendix 4.0-A, p. 5) 2. Efficiency standards regarding roofing, ceilings, and insulation are as follows: Roofs/Ceilings and Insulation: New construction must reduce roof heat island effects per CALGreen Building Code section 106.11.2, which has requirements for the solar reflectance and thermal emittance of materials. Roofing materials must also meet solar reflectance and thermal emittance standards contained in Title 20 Standards. There are also requirements for the installation of roofing and ceiling insulation. (See Title 24, Part 6 Compliance Manual at Section 3.2.2.) Exterior Walls: Must meet requirements in current edition of California Energy Code and comply with sections A5.106.7.1 or A5.106.7.2 of CALGreen Building code for wall surfaces, and section 5.407.1, requiring weather-resistant exterior wall and foundation envelope. Must also meet requirements contained in Title 24, Part 6, which vary by material of the exterior walls. (See Title 24, Part 6 Compliance Manual, Part 3.2.3.) Demising (Interior) Walls: Mandatory insulation requirements for demising walls (which separate conditioned from non-conditions space). (*Id.,* at 3.2.4.) Door Insulation: There are mandatory requirements for air infiltration rates to improve insulation efficiency. (*Id.,* at 3.2.5.) Flooring Insulation: There are mandatory requirements for insulation that depend on the material and location of the flooring. (*Id.,* at 3.2.6.)

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
223	SJVAPCD List, p. 11	Industrial Heating 1. Orient buildings to take advantage of solar heating and natural cooling and use passive solar designs	Yes	MM 21-3 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (DRP 2017, p. 5.21-88) The Project takes advantage of natural cooling options by requiring the installation of operable windows designed to maximize natural ventilation by opening into prevailing west winds at inlets and away outlets, and installing operable clerestory windows for chimney effect cooling. Per the Centennial Green Development Program, the Project will incorporate passive solar design to reduce heat loads from glazing by strategically locating shade trees, trellises, awnings, exterior blinds, or shutters, to provide shading, and will increase air flow and reduce heat sinks at building entrances by, for example, including vegetation, water ponds, or fountains outside inlet openings to pre-cool air flow into buildings. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20) It also incorporates deep overhangs. (*Id.,* Appendix 2-B to Appendix 4.0-A, p. 5) The Project maximizes solar orientation, as further described in rows 39 through 41.
224	SJVAPCD List, p. 11	Residential Energy Efficiency 1. Orient buildings to take advantage of solar heating and natural cooling and use passive solar designs 2. Increase wall and attic insulation beyond [2012] Title 24 requirements	Yes	Since the SJVAPCD list was last updated in 2012, energy efficiency standards have been made more stringent by Title 24 requirements. For example, Title 24 standards set minimum energy-saving requirements for new buildings and renovations that will reduce energy used for lighting, heating, cooling, ventilation, and water heating, and the project is required to comply with these stringent current building code requirements. In fact, MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. (DRP 2017, p. 5.21-88) Specifically, with regard to these suggested measures: 1. The Project maximizes solar orientation to provide natural heating and cooling, as described in rows 39 through 41, 223, 225, and 226. 2. 2016 Title 24 requirements are more stringent than 2012 requirements, and the Project has committed to exceeding 2016 Title

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				24 requirements by 15 percent for residential buildings. (*Id.,* p. 5.21-88) For details regarding 2016 Title 24 insulation requirements, see row 222.
225	SLOAPCD List, p. 3-18	Design building to include roof overhangs that are sufficient to block the high summer sun, but not the lower winter sun, from penetrating south facing windows (passive solar design).	Yes	The Project takes advantage of natural cooling options by requiring the installation of operable windows designed to maximize natural ventilation by opening into prevailing west winds at inlets and away outlets, and installing operable clerestory windows for chimney effect cooling. Per the Centennial Green Development Program, the Project will incorporate passive solar design to reduce heat loads from glazing by strategically locating shade trees, trellises, awnings, exterior blinds, or shutters, to provide shading, and will increase air flow and reduce heat sinks at building entrances by, for example, including vegetation, water ponds, or fountains outside inlet openings to pre-cool air flow into buildings. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 20) It also incorporates deep overhangs. (*Id.,* Appendix 2-B to Appendix 4.0-A, p. 5) The Project maximizes solar orientation, as further described in rows 39 through 41.
226	CAPCOA List, p. B-29	Shading Mechanism**.** Install energy-reducing shading mechanisms for windows, porch, patio and walkway overhangs.	Yes	The Project takes advantage of natural cooling options by requiring the installation of operable windows designed to maximize natural ventilation by opening into prevailing west winds at inlets and away outlets, and installing operable clerestory windows for chimney effect cooling. Per the Centennial Green Development Program, the Project will incorporate passive solar design to reduce heat loads from glazing by strategically locating shade trees, trellises, awnings, exterior blinds, or shutters, to provide shading, and will increase air flow and reduce heat sinks at building entrances by, for example, including vegetation, water ponds, or fountains outside inlet openings to pre-cool air flow into buildings. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 20) It also incorporates deep overhangs. (*Id.,* Appendix 2-B to Appendix 4.0-A, p. 5) The Project maximizes solar orientation, as further described in rows 39 through 41.

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
227	CAPCOA List, p. B-30	Passive Heating and Cooling Systems. Install energy-reducing passive heating and cooling systems (e.g., insulation and ventilation).	Yes	The Project takes advantage of natural cooling options by requiring the installation of operable windows designed to maximize natural ventilation by opening into prevailing west winds at inlets and away outlets, and installing operable clerestory windows for chimney effect cooling. Per the Centennial Green Development Program, the Project will incorporate passive solar design to reduce heat loads from glazing by strategically locating shade trees, trellises, awnings, exterior blinds, or shutters, to provide shading, and will increase air flow and reduce heat sinks at building entrances by, for example, including vegetation, water ponds, or fountains outside inlet openings to pre-cool air flow into buildings. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 20) It also incorporates deep overhangs. (*Id.,* Appendix 2-B to Appendix 4.0-A, p. 5) The Project maximizes solar orientation, as further described in rows 39 through 41. MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. (*Id.,* p. 5.21-88) Similarly, MM 21-3 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (*Ibid*.) For details regarding 2016 Title 24 insulation requirements, see row 222.
228	CAPCOA List, p. B-26	Low-Energy Cooling. Project optimizes building's thermal distribution by separating ventilation and thermal conditioning systems.	Yes – Functional Equivalent Required	Uses associated with the Project are subject to appliance efficiency requirements for heaters and air conditioners. (Title 20 Standards, Sections 1605.1(b),(c),(d),(e), 1605.3(b),(c),(d),(e) as applicable.) MM 21-8 requires that Energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission requirements or ENERGY STAR requirements, or equivalent, shall be exclusively offered by residential builders, and this includes room air conditioners. (DRP 2017, p. 5.21-90) See also the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 18) Buildings will also be required to use timed or smart remote communicating thermostats in residential and

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				nonresidential buildings, including meeting applicable integration requirements for response signals from the electric utility. (Id., p. 20) All Project buildings will include appropriately sized and high-efficiency heating and cooling systems. (*Id.,* Appendix 4.0-A, p. 3-62) The Project incorporates passive and energy-efficient cooling and heating systems, as described in rows 221 through 227. The Project maximizes solar orientation, as further described in rows 39 through 41.
229	BAAQMD List, p. 4-19	Increase roof/ceiling insulation	Yes	MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. (DRP 2017, p. 5.21-88) Similarly, MM 21-3 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (*Ibid*.) For details regarding 2016 Title 24 insulation requirements, see row 222.
230	SJVAPCD List, p. 14	Install "whole-house" or "fresh-air" ventilation system.	Yes – Functional Equivalent Required	MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. (DRP 2017, p. 5.21-88) Similarly, MM 21-3 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (*Ibid*.) The Project incorporates passive and energy-efficient cooling and heating systems, as described in rows 221 through 227. The Project maximizes solar orientation, as further described in rows 39 through 41.
231	BAAQMD List, p. 4-18	HVAC duct sealing	Yes	Title 24 requires duct sealing, and the Project must legally comply with this requirement. All Project buildings will include appropriately sized and high-efficiency HVAC systems with sealed ducts. (DRP 2017, Appendix 4.0-A, p. 3-62)

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
232	SLOAPCD List, p. 3-18	Install high efficiency heating and cooling systems.	Yes	Uses associated with the Project are subject to appliance efficiency requirements for heaters and air conditioners. (Title 20 Standards, Sections 1605.1(b),(c),(d),(e), 1605.3(b),(c),(d),(e) as applicable.) MM 21-8 requires that Energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission requirements or ENERGY STAR requirements, or equivalent, shall be exclusively offered by residential builders, and this includes room air conditioners. (DRP 2017, p. 5.21-90) See also the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 18) Buildings will also be required to use timed or smart remote communicating thermostats in residential and nonresidential buildings, including meeting applicable integration requirements for response signals from the electric utility. (*Id.,* p. 20) All Project buildings will include appropriately sized and high-efficiency heating and cooling systems. (*Id.,* Appendix 4.0-A, p. 3-62)
233	CAPCOA List, p. B-30	Ceiling/Whole-House Fans**.** Install energy-reducing ceiling/whole-house fans.	Yes – Functional Equivalent Required	The Project includes bathroom exhaust fans and kitchen fans for gas ranges, which shall comply with California efficiency standards and be vented or ducted to the outdoors. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 26) The Project is also required to comply with various energy efficiency, passive cooling, and insulation requirements, as discussed in rows 222 through 232. Per the Centennial Green Development Program, the Project will require builders to use timed or smart remote communicating thermostats in residential and nonresidential buildings, including meeting applicable integration requirements for demand response signals from the electric utility. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20) The Project maximizes solar orientation, as further described in rows 39 through 41.

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
234	SJVAPCD List, p. 13	Improve the thermal integrity/efficiency of buildings, and reduce the thermal load with automated and timed temperature controls or occupant sensors.	Yes	Per the Centennial Green Development Program, the Project will require builders to use timed or smart remote communicating thermostats in residential and nonresidential buildings, including meeting applicable integration requirements for demand response signals from the electric utility. (DRP 2017. Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20) The Project maximizes solar orientation, as further described in rows 39 through 41.
235	SLOAPCD List, p. 3-18	Install energy-reducing programmable thermostats.	Yes	Per the Centennial Green Development Program, the Project will require builders to use timed or smart remote communicating thermostats in residential and nonresidential buildings, including meeting applicable integration requirements for demand response signals from the electric utility. (DRP 2017, Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20)
236	CAPCOA List, p. B-30	Programmable Thermostats**.** Install energy-reducing programmable thermostats that automatically adjust temperature settings.	Yes	Per the Centennial Green Development Program, the Project will require builders to use timed or smart remote communicating thermostats in residential and nonresidential buildings, including meeting applicable integration requirements for demand response signals from the electric utility. (DRP 2017, Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20)
237	BAAQMD List, pp. 4-14, -15	Require smart meters and programmable thermostats	Yes	Per the Centennial Green Development Program, the Project will require builders to use timed or smart remote communicating thermostats in residential and nonresidential buildings, including meeting applicable integration requirements for demand response signals from the electric utility. (DRP 2017, Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20)
238	SJVAPCD List, p. 14	Install HEPA (High Efficiency Particle Arrestance) Filters.	Yes – Functional Equivalent Required	Per PDF 11-6, the Project prohibits residences, schools, day care centers or other land uses involving public congregation from being built within 150 feet of the near edge of the SR-138 traffic lanes. This requirement would ensure that risk of exposure to diesel particular matter is less than what is allowed by the AVAQMD and SCAQMD guidelines. (DRP 2017, p. 5.11-31) This requirement has been incorporated into MM 11-10. (*Id.,* p. 5.11-82) As an added layer of protection, MM 11-11 further

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				requires that prior to future tract map approvals, if any sensitive receptors (e.g. residential, day care, schools, hospitals) would be located within 500 feet of the SR-138 or a high-volume roadway, an additional dispersion modeling study must be conducted to estimate diesel PM air concentrations. If the study finds that diesel PM TAC emissions would be significant at the location of a proposed sensitive receptor, then effective TAC reduction measures must be implemented to mitigate for interior air quality, such as filtration technologies or equivalent protections against TACs from vehicle emissions, as discussed in response to Comment F.8-189.
239	CAPCOA List, p. B-22	High-Efficiency Pumps**.** Project shall use high-efficiency pumps.	Yes	Title 24 requires high-efficiency pumps, and the Project must legally comply with relevant requirements. (See, e.g., Title 24, Table 110.2-B Unitary and Applied Heat Pumps, Minimum Efficiency Requirements.)
240	SJVAPCD List, p. 14	Install high efficiency Energy Star heating or ground source heat pump.	Yes	Title 24 requires high-efficiency pumps, and the Project must legally comply with relevant requirements. (See, e.g., Title 24, Table 110.2-B Unitary and Applied Heat Pumps, Minimum Efficiency Requirements.)
241	BAAQMD List, p. 4-15	Install green roofs	No. Not feasible.	The Specific Plan specifies that roof gardens are a potential use for some multi-family and single-family residential building types, including the MFA Wrap and SFA Motorcourt. (DRP 2017, Appendix 3-A to Appendix 4.0-A, p. 25) However, making green roofs a requirement would conflict with the Project's commitment to maximizing on-site generation of solar power as specified in MM 21-1 and the Green Development Program. It would also require extensive maintenance in the arid climate. Therefore, the Project more appropriately focuses on, and must comply with cool roofing requirements, as discussed below in rows 243 through 245.
242	CAPCOA List, p. B-26	Green Roof**.** Install a vegetated roof that covers at least 50 percent of roof area. The reduction assumes that a vegetated roof is installed on at least 50 percent of the roof area or that a combination high albedo and vegetated roof surface is installed that meets	No. Not feasible.	The Specific Plan specifies that roof gardens are a potential use for some multi-family and single-family residential building types, including the MFA Wrap and SFA Motorcourt. (DRP 2017, Appendix 3-A to Appendix 4.0-A, p. 25) However, making green roofs a requirement would conflict with the Project's commitment to maximizing on-site generation of solar power as specified in MM 21-1 and the Green Development

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Row	Source	Measure	Included	Response
		the following standard: (Area of SRI Roof/0.75)+(Area of vegetated roof/0.5) >= Total Roof Area. Water consumption reduction measures shall be considered in the design of the green roof.		Program. It would also require extensive maintenance in the arid climate. Therefore, the Project more appropriately focuses on, and must comply with cool roofing requirements, as discussed below in rows 243 through 245.
243	CAPCOA List, pp. B-27, B-28	Cool Roofs**.** Project provides cool roofs. Highly reflective, highly emissive roofing materials that stay 50-60°F cooler than a normal roof under a hot summer sun. CA's Cool Savings Program provided rebates to building owners for installing roofing materials with high solar reflectance and thermal emittance. The highest rebate went to roofs on air conditioned buildings, while buildings with rooftop ducts and other nonresidential buildings were eligible for slightly less. The program aimed to reduce peak summer electricity demand and was administered by the CEC.	Yes	The Project is already legally required to comply with this measure. The Project must comply with requirements of the Los Angeles Green Building Standards Code (Title 31). Title 31 includes measures requiring cool roofs. California's Building Energy Efficiency Standards (Title 24) also require cool roofs and has requirements for efficient insulation. Accordingly, the Project's Specific Plan specifies that all Project buildings will come standard with cool roofs. (DRP 2017, Appendix 4.0-A, p. 3-62) Per the Centennial Green Development Program, roofing materials for all buildings shall comply with best management practices currently in place at the time of construction, including cool roof standards, with the exception of roof areas covered by solar panel systems or electricity storage systems. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 19)
244	BAAQMD List, pp. 4-14, 4-15	Require cool roof materials (albedo ≥30)	Yes	The Project is already legally required to comply with this measure. The Project must comply with requirements of the Los Angeles Green Building Standards Code (Title 31). Title 31 includes measures requiring cool roofs. California's Building Energy Efficiency Standards (Title 24) also require cool roofs and has requirements for efficient insulation. Accordingly, the Project's Specific Plan specifies that all Project buildings will come standard with cool roofs. (DRP 2017, Appendix 4.0-A, p. 3-62) Per the Centennial Green Development Program, roofing materials for all buildings shall comply with best management practices currently in place at the time of construction, including cool roof standards, with the exception of roof areas covered by solar panel systems or electricity storage systems. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 19)

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Row	Source	Measure	Included	Response
245	AG List, p. 3	Install light colored "cool" roofs and cool pavements.	Yes	The Project will provide cool roofs, as required by law and the Centennial Green Development Program and discussed in rows 243 and 244. With regard to pavement, The Project will include installation of cool pavements if approved by Caltrans and the County for roadway uses, provided that road installation and maintenance durability and costs are comparable to existing approved roadway materials (since early replacements or more intensive repair result in higher GHG emissions). (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 19) It would also use light-colored, non-reflective finishes to help reduce glare for outside sidewalks, driveways, patios and parking areas. (*Ibid*.)
246	CAPCOA List, pp. B-24 through B-26	Non-roof Surfaces**.** Provide shade (within 5 years) and/or use light colored/high-albedo materials (reflectance of at least 0.3) and/or open grid pavement for at least 30 percent of the site's nonroof impervious surfaces, including parking lots, walkways, plazas, etc.; OR place a minimum of 50 percent of parking spaces underground or covered by structured parking; OR use an open-grid pavement system (less than 50 percent impervious) for a minimum of 50 percent of the parking lot area. The mitigation measure reduces heat islands (thermal gradient differences between developed and undeveloped areas to minimize impact on microclimate and human and wildlife habitats. This measure requires the use of patented or copyright protected methodologies created by the ASTM. The SRI is a measure of the constructed surface's ability to reflect solar heat, as shown by a small rise in temperature. It is defined so that a standard black (reflectance 0.05, emittance 0.90) is "0" and a standard white (reflectance 0.80, emittance 0.90) is 100. To calculate SRI	Yes	With regard to shading of non-roof areas, the Project must and will comply with the Los Angeles Tree Planting Ordinance, which ensures adequate shading of residential and nonresidential developments. (DRP 2017, p. 5.21-37) MMs 21-2 and 21-3 also include the strategic placement of trees and other shading devices. (*Id.,* p. 5.21-88) With regard to paving, the Project must comply with CALGreen paving requirements. Further, consistent with the Los Angeles CCAP, the Project will use durable paving materials that will be determined upon consideration of aggregates, asphalt materials, cementitious materials, recycled materials, and other roadway materials that are commonly used in pavement construction. (*Id.,* p. 4.21-79) The Project will include installation of cool pavements if approved by Caltrans and the County for roadway uses, provided that road installation and maintenance durability and costs are comparable to existing approved roadway materials (since early replacements or more intensive repair result in higher GHG emissions). (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 19) It would also use light-colored, non-reflective finishes to help reduce glare for outside sidewalks, driveways, patios and parking areas. (*Ibid*.) The Project's Green Development Program requires that 60 percent of public and OA trails (Project Green Trails will be 80 percent) with permeable materials, which may include decomposed granite, soilcrete, gravel pavers, grass pavers, variations on different types of grids and blocks, loose aggregate, poly-pavement, permeable asphalt and concrete, and as identified in the Trails Plain in Specific Plan Section 3.11.7. (*Id.,* p. 10) For Project streets, street design proposals for County

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Row	Source	Measure	Included	Response
		for a given material, obtain the reflectance value and emittance value for the material. SRI is calculated according to ASTM E 1980-01. Reflectance is measured according to ASTM E 903, ASTM E 1918, or ASTM C 1549. Emittance is measured according to ASTM E 408 or ASTM C 1371. Default values for some materials will be available in the LEED-NC v2.2 Reference Guide.		review will include technically feasible (given expected future uses) and legally feasible (given applicable ordinances and other requirements) street designs that include permeable pavement, groundcovers, or other measures to reduce use of concrete and asphalt. (*Ibid*.)
247	CAPCOA List, p. B-26	Light-Colored Paving**.** Project provides light-colored paving (e.g., increased albedo pavement)	Yes	The Project will include installation of cool pavements if approved by Caltrans and the County for roadway uses, provided that road installation and maintenance durability and costs are comparable to existing approved roadway materials (since early replacements or more intensive repair result in higher GHG emissions). (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 19) It would also use light-colored, non-reflective finishes to help reduce glare for outside sidewalks, driveways, patios and parking areas. (*Ibid*.) The Project's Green Development Program requires that 60 percent of public and OA trails (Project Green Trails will be 80 percent) with permeable materials, which may include decomposed granite, soilcrete, gravel pavers, grass pavers, variations on different types of grids and blocks, loose aggregate, poly-pavement, permeable asphalt and concrete, and as identified in the Trails Plain in Specific Plan Section 3.11.7. (*Id.,* p. 10) For Project streets, street design proposals for County review will include technically feasible (given expected future uses) and legally feasible (given applicable ordinances and other requirements) street designs that include permeable pavement, groundcovers, or other measures to reduce use of concrete and asphalt. (*Ibid*.)

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Row	Source	Measure	Included	Response
248	SLOAPCD List, p. 3-18	Utilize double-paned windows.	Yes – Functional Equivalent Required	Existing requirements ensure the efficiency of Project windows, and window efficiency is already required under applicable Building Energy Efficiency Standards. MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. (DRP 2017, p. 5.21-88) Similarly, MM 21-3 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (*Ibid*.) For details regarding 2016 Title 24 insulation requirements, see row 222.
249	SLOAPCD List, p. 3-18	Install door sweeps and weather stripping (if more efficient doors and windows are not available).	Yes – Functional Equivalent Required	Existing requirements ensure the efficiency of Project doors and windows. MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. (DRP 2017, p. 5.21-88) Similarly, MM 21-3 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (*Ibid*.) For details regarding 2016 Title 24 insulation requirements, see row 222. See also row 248.
250	CAPCOA List, p. B-23	Energy Star Roof**.** Project installs Energy Star labeled roof materials.	Yes – Functional Equivalent Required	As indicated in the Centennial Green Development Program, the Project shall comply with all State Energy Efficiency Standards for Residential and Non-residential buildings (Title 24; 24 CCR Part 6) and California Building Standards Code (CALGreen; 24 CCR Par 11) requirements in effect at the time the building application is submitted. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18) Additionally, the Project shall reduce energy use by 15 percent below 2016 Title 24 Standards for Residential Development and 10 Percent Below for Nonresidential Developments. (*Ibid*.) As part of this commitment, the Project will implement energy-efficient design practices such as high-performance glazing, Energy Star compliant systems and appliances, and radiant

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Row	Source	Measure	Included	Response
				heat proof barriers (including but limited to high-albedo white thermoplastic polyolefin roof membrane). (*Ibid*.) Roofing materials for all buildings shall comply with best management practices currently in place at the time of construction, including cool roof standards, with the exception of roof areas covered by solar panel systems or electricity storage systems. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 14)
251	SLOAPCD List, p. 3-20	Use roofing material with a solar reflectance values meeting the EPA/DOE Energy Star® rating to reduce summer cooling needs.	Yes – Functional Equivalent Required	As indicated in the Centennial Green Development Program, the Project shall comply with all State Energy Efficiency Standards for Residential and Non-residential buildings (Title 24; 24 CCR Part 6) and California Building Standards Code (CALGreen; 24 CCR Par 11) requirements in effect at the time the building application is submitted. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18) Additionally, the Project shall reduce energy use by 15 percent below 2016 Title 24 Standards for Residential Development and 10 Percent Below for Nonresidential Developments. (*Ibid*.) As part of this commitment, the Project will implement energy-efficient design practices such as high-performance glazing, Energy Star compliant systems and appliances, and radiant heat proof barriers (including but limited to high-albedo white thermoplastic polyolefin roof membrane). (*Ibid*.) Roofing materials for all buildings shall comply with best management practices currently in place at the time of construction, including cool roof standards, with the exception of roof areas covered by solar panel systems or electricity storage systems. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 14)
252	SLOAPCD List, p. 3-18	Utilize built-in energy efficient appliances (i.e. Energy Star®).	Yes	The Centennial Green Development Program requires builders to install energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18)

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Row	Source	Measure	Included	Response
253	CAPCOA List, p. B-28	Energy Efficient Appliance Standards. Project uses energy efficient appliances (e.g., Energy Star).	Yes	The Centennial Green Development Program requires builders to install energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18)
254	SMAQMD List, p. 11	Energy Efficient Appliances. Use appliances more energy efficient than standard models.	Yes	The Centennial Green Development Program requires builders to install energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18)
255	SJVAPCD List, p. 13	Install efficient heating and other appliances, such as water heaters, cooking equipment, refrigerators, furnaces and boiler units beyond [2012] Title 24 requirements (see Title 24, part 6, Energy Efficiency Standards for Residential and Nonresidential Buildings: http://www.energy.ca.gov/title24/)	Yes	The Project will comply with all Title 24 standards for residential and nonresidential buildings, and with CALGreen requirements in effect at the time the building permit application is submitted. Title 24 covers the use of energy saving appliances, conditioning systems, water heating, and lighting. CALGreen covers the use of water and energy, among other issues, and requires building commissioning to verify building systems are functioning at maximum efficiency. The Project has also committed to additional requirements, as follows: 1. The Project's plans and specifications shall demonstrate that development within the Specific Plan shall reduce energy use by 15 percent below 2016 Title 24 Standards for residential developments and 10 percent below for nonresidential developments, per the CALGreen Tier 1 Voluntary Measures. 2. Implement energy-efficient design practices such as high-performance glazing, Energy Star compliant systems and appliances, radiant heat roof barriers (including but not limited to high-albedo white thermoplastic polyolefin roof membrane), high-efficient HVAC with hot-gas reheat, insulation on all pipes, programmable thermostats, solar access, shading of HVAC systems

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Row	Source	Measure	Included	Response
				from direct sunlight, use of formaldehyde-free insulation, zero use of CFC refrigerants in commercial buildings, use of recycled-content gypsum board, sealed ducts, fluorescent and LED bulbs, orientation of building and incorporation of landscaping to maximize passive solar (heating during cool seasons, and minimize heat gain during hot season), and designs that take advantage of prevailing winds. 3. The Master Developer shall use its design review process to comply with this requirement. (*Ibid*.) To ensure continued compliance with efficiency requirements, the Project includes MMs 21-6 and 21-7. MM 21-6 requires owners of single-family and multi-family residential units to present the buyer with a written energy audit checklist that certifies that all HVAC systems, thermostats, appliances, windows and swimming pools (if applicable) are the same as those originally installed, or if changed, that thy otherwise comply with the Centennial Green Development Program. (*Id.,* p. 5.21-89) MM 21-7 requires that for nonresidential development, the owner or tenant provides a report, at specified times, that evaluates whether all major building systems such as heat furnace, air conditioner, and other mechanisms are functioning within design standards. (*Id.,* pp. 5.21-89, -90)
256	AG List, p. 2	Install energy efficient lighting (e.g., light emitting diodes (LEDs)), heating and cooling systems, appliances, equipment, and control systems.	Yes	The Centennial Green Development Program requires builders to install energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18) Per the Centennial Green Development Program, the Project will require builders to use timed or smart remote communicating thermostats in residential and nonresidential buildings, including meeting applicable integration requirements for demand response signals from the electric utility. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20) The Project will also install energy efficient and environmentally sensitive lighting, as discussed in Table 2-

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Row	Source	Measure	Included	Response
				A-1 in the Green Development Program (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 19), and in rows 282 through 288, below.
257	SJVAPCD List, p. 14	Install built-in energy efficient appliances.	Yes	The Centennial Green Development Program requires builders to install energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18)
258	2008 OPR List, p. 19	Encourage public and private construction of LEED (Leadership in Energy and Environmental Design) certified (or equivalent) buildings.	Yes – Functional Equivalent Required	California is a global leader on climate policy and programs, and has adopted scores of statutes and regulations to reduce GHG across multiple sectors, which are the equivalent of or would exceed LEED standards. The "green" ranking systems, including LEED, are public and private ranking entities under no obligation to incorporate or address inconsistent applicable California standards, and generally target just a fraction of the multiple sources of GHG emissions associated with land use projects. Further, because the ranking systems, including LEED, are not part of the integrated programs, regulations, and statutes designed to achieve California's GHG reduction target, they do not have any inherent or presumptive superiority to California's legal mandates. These systems also require specialized training and expertise to monitor and certify, can change without notice to affected parties, may not remain timely based on changing technologies and laws, and provide a less stable enforcement framework than compliance with California's legally-required GHG reduction requirements and the carefully crafted Centennial Green Development Program. However, the Centennial Green Development Program does require the delivery of a third-party verification by a qualified inspector to the Department of Public Works that demonstrates that the Centennial Green Development Program has been implemented. The qualified inspector could be a LEED accredited professional. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 8)

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Row	Source	Measure	Included	Response
				It is also noted that many of the LEED design principles are consistent with Project design and principles. For example, the Project meets LEED design criteria including walkable streets, a connected and open community, mixed-use neighborhoods, a mix of housing types, transportation demand management, access to public space and recreation facilities, and visitability and universal design. (See U.S. Green Building Council, LEED credit library, available online at: www.usgbc.org/credits).
259	CAPCOA List, p. B-20	LEED Certification**:** LEED promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality.	Yes – Functional Equivalent Required	California is a global leader on climate policy and programs and has adopted scores of statutes and regulations to reduce GHG across multiple sectors, which are the equivalent of or would exceed LEED standards. The "green" ranking systems, including LEED, are public and private ranking entities under no obligation to incorporate or address inconsistent applicable California standards, and generally target just a fraction of the multiple sources of GHG emissions associated with land use projects. Further, because the ranking systems, including LEED, are not part of the integrated programs, regulations, and statutes designed to achieve California's GHG reduction target, they do not have any inherent or presumptive superiority to California's legal mandates. These systems also require specialized training and expertise to monitor and certify, can change without notice to affected parties, may not remain timely based on changing technologies and laws, and provide a less stable enforcement framework than compliance with California's legally-required GHG reduction requirements and the carefully crafted Centennial Green Development Program. However, the Centennial Green Development Program does require the delivery of a third-party verification by a qualified inspector to the Department of Public Works that demonstrates that the Centennial Green Development Program has been implemented. The qualified inspector could be a LEED accredited professional. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 8) It is also noted that many of the LEED design principles are consistent with Project design and principles. For example, the Project meets LEED design criteria including walkable streets, a connected and open

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				community, mixed-use neighborhoods, a mix of housing types, transportation demand management, access to public space and recreation facilities, and visitability and universal design. (See U.S. Green Building Council, LEED credit library, available online at: www.usgbc.org/credits).
260	BAAQMD List, p. 4-15	Meet GBC standards in all New construction	Yes	While the Project is already required to comply with Title 24 requirements, the Project has committed to exceeding the current requirements. Per the Green Development Program, prior to any tentative tract map approval, the project proponent shall provide the County with an Energy Plan documenting compliance with applicable energy conservation requirements of applicable Title 24 standards in the California Code of Regulations, including verification that the project will exceed the energy conservation requirements of 2016 Title 24 standards by 15 percent for residential developments and 10 percent for nonresidential developments. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 21) The Energy Plan shall also confirm that a menu of energy efficiency design elements, along with other design considerations and options, has been made available by the project proponent to builders, developers, and property owners as part of the internal design review process. (*Ibid*.) Each developer, builder, or property owner shall incorporate the design elements required to comply with 2016 Title 24 requirements and select from the menu or implement other available technologies as may be needed to reduce energy consumption by 15 percent below 2016 Title 24 requirements for residential developments and 10 percent for nonresidential developments. (*Ibid*.) All provisions outlined in the approved Energy Plan shall be either conditions of approval for any commercial/industrial site plan or included as notes on all final subdivision maps. (*Ibid*.) The Project's Green building measures are also consistent with, and based on, the current California Green (CALGreen) Building Standards Code. (*Id.,* p. 4) The Centennial Green Development Program's Green Building component requires all residential and non-residential development to comply with CALGreen Code Mandatory Measures, as well as the voluntary 2016 CALGreen Tier 1 measures, and to comply with the Los Angeles Green Building

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				Ordinances. (*Ibid*.) Additional measures are also included to further improve energy, water and material management conservation and efficiency, and to assure health building materials and designs, as discussed throughout this response.
261	AG List, pp. 1-2	Incorporate green building practices and design elements. Meet recognized green building and energy efficiency benchmarks.	Yes	Per the Green Development Program, prior to any tentative tract map approval, the project proponent shall provide the County with an Energy Plan documenting compliance with applicable energy conservation requirements of applicable Title 24 standards in the California Code of Regulations, including verification that the project will exceed the energy conservation requirements of 2016 Title 24 standards by 15 percent for residential developments and 10 percent for nonresidential developments. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 21) The Centennial Green Development Program's Green Building component requires all residential and non-residential development to comply with CALGreen Code Mandatory Measures, as well as the voluntary 2016 CALGreen Tier 1 measures, and to comply with the Los Angeles Green Building Ordinances. (*Ibid*.) Additional measures are also included to further improve energy, water and material management conservation and efficiency, and to assure health building materials and designs, as discussed throughout this response. See row 260 for further discussion.
262	SMAQMD List, p. 11	Exceed Title 24. Use less energy than allowed by [2016] Title 24.	Yes	While the Project is already required to comply with Title 24 requirements, the Project has committed to exceeding the current requirements. Per the Green Development Program, prior to any tentative tract map approval, the project proponent shall provide the County with an Energy Plan documenting compliance with applicable energy conservation requirements of applicable Title 24 standards in the California Code of Regulations, including verification that the project will exceed the energy conservation requirements of 2016 Title 24 standards by 15 percent for residential developments and 10 percent for nonresidential developments. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 21) See row 260 for further discussion.

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Row	Source	Measure	Included	Response
263	BAAQMD List, p. 4-14	Increase Energy Efficiency Beyond [2011] Title 24	Yes	Title 24 requirements have been made more stringent since 2011, when the BAAQMD list was prepared. While the Project is already required to comply with Title 24 requirements, the Project has committed to exceeding the current requirements. Per the Green Development Program, prior to any tentative tract map approval, the project proponent shall provide the County with an Energy Plan documenting compliance with applicable energy conservation requirements of applicable 2016 Title 24 standards in the California Code of Regulations, including verification that the project will exceed the energy conservation requirements of 2016 Title 24 standards by 15 percent for residential developments and 10 percent for nonresidential developments. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 21) See row 260 for further discussion.
264	CAPCOA List, p. B-24	Exceed Title 24**.** Project exceeds [2008] title 24 requirements by 20 percent.	Yes	Title 24 requirements have been made more stringent since 2008. While the Project is already required to comply with 2016 Title 24 requirements, the Project has committed to exceeding the current requirements. Per the Green Development Program, prior to any tentative tract map approval, the project proponent shall provide the County with an Energy Plan documenting compliance with applicable energy conservation requirements of applicable Title 24 standards in the California Code of Regulations, including verification that the project will exceed the energy conservation requirements of 2016 Title 24 standards by 15 percent for residential developments and 10 percent for nonresidential developments. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 21) See row 260 for further discussion.
265	SLOAPCD List, p. 3-18	Increase the building energy rating by 20 percent above [2012] Title 24 requirements. Measures used to reach the 20 percent rating cannot be double counted.	Yes	Title 24 requirements have been made more stringent since 2012. While the Project is already required to comply with 2016 Title 24 requirements, the Project has committed to exceeding the current requirements. Per the Green Development Program, prior to any tentative tract map approval, the project proponent shall provide the County with an Energy Plan documenting compliance with applicable energy conservation requirements of applicable Title 24 standards in the California Code of Regulations, including verification that the project will exceed the energy conservation requirements of 2016 Title

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				24 standards by 15 percent for residential developments and 10 percent for nonresidential developments. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 21) See row 260 for further discussion.
266	2008 OPR List, p. 19	Recognize and promote energy saving measures beyond Title 24 requirements for residential and commercial projects	Yes	While the Project is already required to comply with 2016 Title 24 requirements, the Project has committed to exceeding the current requirements. Per the Green Development Program, prior to any tentative tract map approval, the project proponent shall provide the County with an Energy Plan documenting compliance with applicable energy conservation requirements of applicable Title 24 standards in the California Code of Regulations, including verification that the project will exceed the energy conservation requirements of 2016 Title 24 standards by 15 percent for residential developments and 10 percent for nonresidential developments. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 21) See row 260 for further discussion.
267	2008 OPR List, p. 19	Design, build, and operate schools that meet the Collaborative for High Performance Schools (CHPS) best practices.	No. Not feasible to require, but County encourages	The County and the Applicant do not control future school facilities on the project site and may not mandate that such schools comply with referenced CHPS practices. However, as noted in the Project's Green Development Program, in the case of all public school buildings, schools constructed within the Specific Plan boundaries will be required to meet the CALGreen Code Tier 1 requirements at the time of building permit issuance, and are encouraged, by the County, to meet additional criteria of the CHPS, with the goal of providing highly efficient and productive school environments. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 4)
268	2008 OPR List, p. 19	Where feasible, include in new buildings facilities to support the use of low/zero carbon fueled vehicles, such as the charging of electric vehicles from green electricity sources.	Yes	MM 21-15 requires the installation of one 208/240 volts of alternating current (VAC) receptacle that may be used for charging electric vehicles in each detached and attached single-family residence. The installation shall comply with requirements of Section 4.106.4.1 of the 2016 CALGreen Code, or the most applicable code at the time of construction. (DRP 2017, p. 5.21-91) See response to Comment F.8-94 for updates to MM 21-15. MM 21-6 requires the Applicant/Developer to provide plans and specifications to the County demonstrating that alternative energy

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				fueling stations (a 208/240 VAC electrical station or one providing another new or improved technology) that shall provide for the simultaneous charging of two vehicles and shall be installed as follows: • Business Park and Institutional land use designations shall provide a minimum of one alternative energy vehicle fueling station on site for the first 50,000 square feet of usable floor space and additional alternative energy vehicle fueling stations for each additional 50,000 square feet of usable floor space thereafter. • Multi-family residential buildings of at least seventeen (17) residential units shall provide a minimum of one alternative energy vehicle fueling station for the first seventeen (17) residential units and an additional alternative energy vehicle fueling station for each additional seventeen (17) residential units thereafter. • The Town Center and each Village Center shall provide a minimum of one alternative energy vehicle charging station. • Designated Transit Hubs shall provide a minimum of one alternative energy vehicle charging station. (*Ibid*.) MM 21-18 requires the incorporation of preferentially-located parking spaces for alternative-fueled parking spaces into visitor parking for multi-family residential buildings. (*Id.,* p. 5.21-92) MMs 11-6 and 21-19 (as updated in response to Comment F.8-95) contain the following relevant requirements for parking lots with 20 or more parking spaces that serve uses other than residential or nonresidential buildings (e.g., trailhead, parks) and parking structures and parking lots that serve multifamily residential buildings with 17 or more multi-family units: • The parking facility shall include a minimum of five percent preferentially located parking spaces for alternative-fueled (electric, natural gas, or similar low-emitting technology) vehicles.

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				• Five percent of the total number of parking spaces provided in the facility, but in no case less than one, shall be Electric Vehicle Parking Spaces capable of supporting future Electric Vehicle Supply Equipment, as defined in CALGreen Code Section 202, with specifications as laid forth in MM 21-19. (*Ibid*.) See also the Centennial Green Development Program at p. 14. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 14)
269	SLOAPCD List, p. 3-19	Provide electrical charging station for electric vehicles.	Yes	The Project provides electric vehicle charging stations, as discussed in row 268.
270	CAPCOA List, p. B-26	Charging Facilities**.** Project installs EV charging facilities.	Yes	The Project provides electric vehicle charging facilities, as discussed in row 268.
271	CAPCOA List, p. B-18	Recharging Areas**.** Provide residential buildings with a "utility" room or space for recharging batteries, whether for use in a car, electric lawnmower, other electric landscaping equipment, or even batteries for small items such as flashlights.	Yes – Functional Equivalent Required	The Project incorporates adequate infrastructure for Project residents to recharge electric cars and electrical equipment, including through the incorporation of 208/240 VAC receptacles at single-family homes and alternative energy fueling stations at multi-family residential buildings, electrical outlets that will be included throughout the interior of Project residential units, and exterior electrical outlets on patios and elsewhere outside residential units, as discussed in rows 268 and 274.
272	SJVAPCD List, p. 11, 15	Landscape Maintenance 1. Provide electric maintenance equipment From individual measure list: 1. Project provides and/or requires use of electric maintenance equipment; including, but not limited to electric lawn mowers, electric leaf blowers, etc. 2. Prohibit gas powered landscape maintenance equipment within developments.	Yes – Functional Equivalent Required	All landscape maintenance equipment at Centennial will be electric. The Project will incorporate an outreach and education program for the Centennial property owners, in collaboration with SCAQMD, to reduce the use of gasoline-or diesel-powered landscaping equipment. (DRP 2017, p. 5.21-79) CARB also regulates emissions from landscaping equipment in its Small Off-Road Engine regulations, and landscaping equipment that does not comply with CARB requirements may not be sold in California. Further, the use of turf is restricted by the County's drought-tolerant landscaping requirements, which specify that a maximum of 25 percent of landscaped areas may be turf grass. (*Id.,* p. 5.21-36) Accordingly, per the Centennial Green Development Program, the Project will require that landscaped areas of single-family detached residential front yards and multi-family residential common areas contain no more than 25 percent turf grass and that landscaped

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				commercial areas may include turf only if irrigated with recycled water. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 27) This strict limitation on turf grass would make the provision of electric lawnmowers to Project residents of very limited utility. Rather, Residential buildings will have exterior electrical receptacles and natural gas or propane hookups per MM 11-5 (*Id.,* p. 5.11-80), including on patios, to facilitate the use of electrical equipment (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20)
273	CAPCOA List, p. B-19	Electric Landmower**.** Provide a complimentary electric lawnmower to each residential buyer.	Yes – Functional Equivalent Required	All landscape maintenance equipment at Centennial will be electric. The Project will incorporate an outreach and education program for the Centennial property owners, in collaboration with SCAQMD, to reduce the use of gasoline-or diesel-powered landscaping equipment. (DRP 2017, p. 5.21-79) CARB also regulates emissions from landscaping equipment in its Small Off-Road Engine regulations, and landscaping equipment that does not comply with CARB requirements may not be sold in California. Further, the use of turf is restricted by the County's drought-tolerant landscaping requirements, which specify that a maximum of 25 percent of landscaped areas may be turf grass. (*Id.,* p. 5.21-36) Accordingly, per the Centennial Green Development Program, the Project will require that landscaped areas of single-family detached residential front yards and multi-family residential common areas contain no more than 25 percent turf grass and that landscaped commercial areas may include turf only if irrigated with recycled water. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 27) This strict limitation on turf grass would make the provision of electric lawnmowers to Project residents of very limited utility. Rather, Residential buildings will have exterior electrical receptacles and natural gas or propane hookups per MM 11-5 (*Id.,* p. 5.11-80), including on patios, to facilitate the use of electrical equipment (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20)

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
274	SMAQMD List, p. 11	Electric lawnmower, leaf blower, chainsaw. Landscaping equipment and outdoor electrical plugs provided to project users.	Yes	All landscape maintenance equipment at Centennial will be electric. The Project will incorporate an outreach and education program for the Centennial property owners, in collaboration of SCAQMD, to reduce the use of gasoline-or diesel-powered landscaping equipment. (DRP 2017, p. 5.21-79) Residential buildings will have exterior electrical receptacles and natural gas or propane hookups per MM 11-5 (*Id.,* p. 5.11-80), including on patios. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20) See also rows 272 and 273.
275	BAAQMD List, p. 4-14	Electrically powered landscape equipment and outdoor electrical outlets	Yes	All landscape maintenance equipment at Centennial will be electric. The Project will incorporate an outreach and education program for the Centennial property owners, in collaboration of SCAQMD, to reduce the use of gasoline-or diesel-powered landscaping equipment. (DRP 2017, p. 5.21-79) Residential buildings will have exterior electrical receptacles and natural gas or propane hookups per MM 11-5 (*Id.,* p. 5.11-80), including on patios. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20) See also rows 272 and 273
276	SLOAPCD List, p. 3-19	Provide and require the use of battery powered or electric landscape maintenance equipment for new development.	Yes	All landscape maintenance equipment at Centennial will be electric. The Project will incorporate an outreach and education program for the Centennial property owners, in collaboration of SCAQMD, to reduce the use of gasoline-or diesel-powered landscaping equipment. (DRP 2017, p. 5.21-79) Residential buildings will have exterior electrical receptacles and natural gas or propane hookups per MM 11-5 (*Id.,* p. 5.11-80), including on patios. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20) See also rows 272 and 273.
277	CAPCOA List, p. B-28	Electric Yard Equipment Compatibility. Project provides electrical outlets at building exterior areas.	Yes	Residential buildings will have exterior electrical receptacles and natural gas or propane hookups per MM 11-5 (DRP 2017, p. 5.11-80), including on patios. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20)
278	SLOAPCD List, p. 3-17	Incorporate outdoor electrical outlets to encourage the use of electric appliances and tools.	Yes	Residential buildings will have exterior electrical receptacles and natural gas or propane hookups per MM 11-5 (DRP 2017, p. 5.11-80), including on patios. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20)

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
279	SJVAPCD List, p. 14	Install electrical outlets on the exterior walls of both the front and back of residences or all commercial buildings to promote the use of electric landscape maintenance equipment. Install a gas outlet for use with outdoor cooking appliances, and in any proposed fireplaces, including outdoor recreational fireplaces or pits.	Yes	Residential buildings will have exterior electrical receptacles and natural gas or propane hookups per MM 11-5 (DRP 2017, p. 5.11-80), including on patios. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20) All landscape maintenance equipment at Centennial will be electric. The Project will incorporate an outreach and education program for the Centennial property owners, in collaboration of SCAQMD, to reduce the use of gasoline-or diesel-powered landscaping equipment. (*Id.,* p. 5.21-79)
280	CAPCOA List, p. B-30	Day Lighting Systems**.** Install energy-reducing day lighting systems (e.g., skylights, light shelves and interior transom windows).	Yes	Effective daylighting and maximization of natural daylight is incorporated into the Specific Plan and the principles of the Centennial Green Development Program. (DRP 2017, Appendix 4.0-A, pp. 3-62, 1-7; *Id.,* Appendix 2-A to Appendix 4.0-A, pp. 2, 5)
281	BAAQMD List, p. 4-19	Maximize interior day light	Yes	Effective daylighting and maximization of natural daylight is incorporated into the Specific Plan and the principles of the Centennial Green Development Program. (DRP 2017, Appendix 4.0-A, pp. 3-62, 1-7; *Id.,* Appendix 2-A to Appendix 4.0-A, pp. 2, 5)
282	SJVAPCD List, p. 14	Install energy efficient interior lighting.	Yes	Lighting associated with the Project is subject to energy efficiency requirements in Title 20 Standards, and is also subject to Title 24 requirements, which contain energy standards for non-residential indoor lighting. Mandatory lighting controls for indoor lighting include, for example, regulations for automatic shut-off, automatic daytime controls, demand responsive controls, and certificates of installation. (Title 24, Part 6 Compliance Manual, at Section 5). Lighting associated with the Project will also be subject to energy efficiency requirements adopted pursuant to AB 1109. Enacted in 2007, AB 1109 required the CEC to adopt minimum energy efficiency standards for general purpose lighting, to reduce electricity consumption 50 percent for indoor residential lighting and 25 percent for indoor commercial lighting. The Centennial Green Development Program also requires builders to use energy efficient lighting with automated controls in compliance with all applicable requirements of Title 24, Part 6, Section 150.0(k). (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 19)

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
283	AG List, p. 3	Install efficient lighting, (including LEDs) for traffic, street and other outdoor lighting. Reduce unnecessary outdoor lighting.	Yes	Outdoor lighting associated with the Project must meet applicable Title 20 appliance efficiency standards, as must emergency lighting and self-contained lighting. (Title 20 Standards, Sections 1605.1(j),(k),(n), 1605.3(j),(k),(n).) For any necessary Project improvement involving traffic lighting, traffic signal module and traffic signal lamps, the Project must comply with applicable energy efficiency regulations. (Title 20 Standards, Sections 1605.1(m), 1605.3(m).) Outdoor lighting is also subject to Title 24 efficiency requirements. (See Title 24 Part 6 Compliance Manual, Section 6.) The Centennial Green Development Program incorporates many relevant requirements to ensure energy efficient and environmentally sensitive outdoor lighting, as discussed further in row 284.
284	SMAQMD List, p. 11	Install High Efficiency Lighting. Make use of high-efficient outdoor and public lighting.	Yes	The Centennial Green Development Program incorporates many relevant requirements to ensure energy efficient and environmentally sensitive outdoor lighting, as follows: • Exterior lighting shall not cause unacceptable light trespass and shall be fully shielded. (*Ibid*.) • Outdoor lighting shall be turned off using automatic control devices or systems between the hours of 10:00 PM and sunrise of the following day in commercial, business park, and mixed-use areas, unless required by the County Building Code. If the property operates beyond 10:00 PM, then outdoor lighting shall be turned off 1 hour after the operation ends for the day. (*Ibid*.) • Outdoor lighting for safety and security reasons is allowed after 10:00 PM only if fully shielded motion sensors are used to turn lighting after 10:00 PM and the sensors turn the lighting of automatically no more than 10 minutes after the area is vacated or at least 50 percent of the total lumen levels are reduced or 50 percent of the total outdoor light fixtures are turned off between 10:00 PM and sunrise. (*Ibid*.)

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				• Outdoor lighting in residential and open space areas that are over 15 feet in height shall have an output no greater than 400 lumens. (*Ibid*.) • The maximum height of outdoor lighting fixtures shall be 20 feet in Residential and Open Space areas, 30 feet in Commercial, Mixed Use, and Public areas, and 35 feet in Business Park areas. (*Ibid*.) • The following outdoor lighting is prohibited unless mandated for health and safety reasons by a public agency: drop-down lenses, mercury vapor lights, ultraviolet lights, search lights, laser lights and any outdoor lighting that flashes, blinks, alternates or moves. (*Ibid*.) • Outdoor light fixtures in outdoor recreational areas shall be mounted, aimed, and fully shielded to that light beams fall onto activity areas and no unacceptable light trespass occurs on surrounding areas or properties. Outdoor lighting shall only provide the minimum necessary to illuminate recreational activities areas and shall be no more than 75 feet high. Preferably, these fixtures shall also use high pressure sodium or metal halide lamps. (*Ibid*.) • Outdoor advertising signs, business signs and roof and freestanding signs that are lighted shall be fully shielded. Externally mounted light fixtures shall be mounted on the top of the sign and shall be oriented downward. Externally mounted bulbs or lighting tubes for signs shall not be visible from adjoining properties or public rights-of-way, unless such bulbs or tubes are filled with neon, argon, krypton or other self-illuminating substance. (*Ibid*.) • Street lights (consistent with rural design) shall be limited to urban cross sections with sidewalks, curbs and gutters or at intersections and driveways on County roads, where necessary to alleviate traffic hazards, improve traffic flow and/or promote safety and security of pedestrians. (*Ibid*.)

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				• Limit the hours of community-managed lighting on public streets to midnight unless later lighting will advance public safety and walkability goals. (*Ibid*.)
285	SLOAPCD List, p. 3-18	Utilize energy efficient interior lighting.	Yes	Lighting associated with the Project is subject to energy efficiency requirements in Title 20 Standards, and is also subject to Title 24 requirements, which contain energy standards for non-residential indoor lighting. Mandatory lighting controls for indoor lighting include, for example, regulations for automatic shut-off, automatic daytime controls, demand responsive controls, and certificates of installation. (Title 24, Part 6 Compliance Manual, at Section 5). Lighting associated with the Project will also be subject to energy efficiency requirements adopted pursuant to AB 1109. Enacted in 2007, AB 1109 required the CEC to adopt minimum energy efficiency standards for general purpose lighting, to reduce electricity consumption 50 percent for indoor residential lighting and 25 percent for indoor commercial lighting. The Centennial Green Development Program also requires builders to use energy efficient lighting with automated controls in compliance with all applicable requirements of Title 24, Part 6, Section 150.0(k). (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 19)
286	2008 OPR List, p. 19	Replace traffic lights, street lights, and other electrical uses to energy efficient bulbs and appliances.	Yes	Outdoor lighting associated with the Project must meet applicable Title 20 appliance efficiency standards, as must emergency lighting and self-contained lighting. (Title 20 Standards, Sections 1605.1(j),(k),(n), 1605.3(j),(k),(n).) For any necessary Project improvement involving traffic lighting, traffic signal module and traffic signal lamps, the Project must comply with applicable energy efficiency regulations. (Title 20 Standards, Sections 1605.1(m), 1605.3(m).) Outdoor lighting is also subject to Title 24 efficiency requirements. (See Title 24 Part 6 Compliance Manual, Section 6.) The Centennial Green Development Program incorporates many relevant requirements to ensure energy efficient and environmentally sensitive outdoor lighting, as discussed further in row 284.

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
287	SLOAPCD List, p. 3-18	Utilize low energy street lights (i.e. sodium).	Yes – Functional Equivalent Required	Outdoor lighting associated with the Project must meet applicable Title 20 appliance efficiency standards, as must emergency lighting and self-contained lighting. (Title 20 Standards, Sections 1605.1(j),(k),(n), 1605.3(j),(k),(n).) For any necessary Project improvement involving traffic lighting, traffic signal module and traffic signal lamps, the Project must comply with applicable energy efficiency regulations. (Title 20 Standards, Sections 1605.1(m), 1605.3(m).) Outdoor lighting is also subject to Title 24 efficiency requirements. (See Title 24 Part 6 Compliance Manual, Section 6.) The Centennial Green Development Program incorporates many relevant requirements to ensure energy efficient and environmentally sensitive outdoor lighting, as discussed further in row 284.
288	SLOAPCD List, p. 3-18	Utilize low energy traffic signals (i.e. light emitting diode).	Yes – Functional Equivalent Required	Outdoor lighting associated with the Project must meet applicable Title 20 appliance efficiency standards, as must emergency lighting and self-contained lighting. (Title 20 Standards, Sections 1605.1(j),(k),(n), 1605.3(j),(k),(n).) For any necessary Project improvement involving traffic lighting, traffic signal module and traffic signal lamps, the Project must comply with applicable energy efficiency regulations. (Title 20 Standards, Sections 1605.1(m), 1605.3(m).) Outdoor lighting is also subject to Title 24 efficiency requirements. (See Title 24 Part 6 Compliance Manual, Section 6.) The Centennial Green Development Program incorporates many relevant requirements to ensure energy efficient and environmentally sensitive outdoor lighting, as discussed further in row 284.
289	AG List, p. 15	Provide information on alternative transportation options for consumers, residents, tenants and employees to reduce transportation-related emissions.	Yes	The Project Applicant shall maintain a community website that includes information about: • GHG reduction opportunities to help educate project residents, as well as schools, other agencies, and businesses with facilities on the project site (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 21) • Rebates and low-interest loans to residents that make energy-saving improvements to their homes. (*Ibid*.)

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				• Energy conservation and financial incentive programs, and about potential energy technology systems that may be suitable for larger commercial and institutional users such as combined heat and power systems. (*Ibid*.) • Air quality and greenhouse gas benefits of electric landscape maintenance equipment • Recycling, and the availability of and potential uses for recycled materials, such as the use of salvaged and recycled content materials for hard surface and non-plant landscaping materials. (*Ibid*.) • Energy and water conservation and efficiency for project residents, customers, tenants and large energy users. (*Ibid*.) Per MM 10-1, the Project shall provide internet infrastructure and a community intranet with access for homeowners associations; interest groups; local event scheduling; schools, library, carpool and transit services; and other on-site entertainment and amenities for residential land uses. The internet and intranet will reduce the need for people to use automobile travel to obtain the information that is provided by both. The intranet shall also provide education about greenhouse gas (GHG) emissions; GHG reduction opportunities; energy and water conservation opportunities; financial incentives (e.g., rebates and low-interest loans) for energy-efficiency improvements; and energy-efficiency technology systems, including those suitable for large commercial and industrial users. (*Id.,* p. 5.10-144)
290	AG List, p. 15	Educate consumers, residents, tenants and the public about options for reducing motor vehicle-related greenhouse gas emissions. Include information on trip reduction; trip linking; vehicle performance and efficiency (e.g., keeping tires inflated); and low or zero-emission vehicles.	Yes	The Project shall maintain a website and community intranet that provides such information, as discussed in row 289. The Project intranet shall provide education about greenhouse gas (GHG) emissions; GHG reduction opportunities; energy and water conservation opportunities; financial incentives (e.g., rebates and low-interest loans) for energy-efficiency improvements; and energy-efficiency technology systems, including those suitable for large commercial and industrial users. (DRP 2017, p. 5.10-144)

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
291	AG List, p. 4	Provide education on energy efficiency to residents, customers and/or tenants.	Yes	The Project shall maintain a website and community intranet that provides such information, as discussed in rows 289 and 290.
292	2008 OPR List, p. 19	Educate the public, schools, other jurisdictions, professional associations, business and industry about reducing GHG emissions.	Yes	The Project shall maintain a website and community intranet that provides such information, as discussed in rows 289 and 290.
293	CAPCOA List, p. B-31	GHG Emissions Reductions Education. Provide local governments, businesses, and residents with guidance/ protocols/ information on how to reduce GHG emissions (e.g., energy saving, food miles).	Yes	The Project shall maintain a website and community intranet that provides such information, as discussed in rows 289 and 290.
294	SLOAPCD List, p. 3-18	Participate in and implement available energy-efficient rebate programs including air conditioning, gas heating, refrigeration, and lighting programs.	Yes – Functional Equivalent Required	Energy efficient appliances are already required for the Project. The Centennial Green Development Program requires builders to install energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18) The Project Applicant shall also maintain a community website that includes information about rebates and low-interest loans to residents that make additional energy-saving improvements to their homes. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 21) Further, per MM 21-6, deeds, CC&Rs, or similar legal documents shall contain a requirement for single-family and multi-family residential units to present the buyer a written energy audit checklist upon resale. (*Id.,* p. 5.21-89. It shall certify that all HVAC systems, thermostats, appliances, windows and swimming pools (if applicable) are the same as those originally installed or, if changed, otherwise comply with Centennial's Green Development Program. (*Ibid*.)

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
295	BAAQMD List, p. 4-19	Create program to encourage efficiency improvements in rental units	Yes – Functional Equivalent Required	Energy efficiency is already required for multi-family Project units, and this would include rentals. The Centennial Green Development Program requires builders to install energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission (CEC) requirements or ENERGY STAR requirements. Major appliances subject to this requirement include dishwashers, clothes washers, refrigerators, and room air conditioners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18) The Project Applicant shall also maintain a community website that includes information about rebates and low-interest loans to residents that make additional energy-saving improvements to their homes. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 21) Further, per MM 21-6, deeds, CC&Rs, or similar legal documents shall contain a requirement for single-family and multi-family residential units to present the buyer a written energy audit checklist upon resale. (*Id.,* p. 5.21-89. It shall certify that all HVAC systems, thermostats, appliances, windows and swimming pools (if applicable) are the same as those originally installed or, if changed, otherwise comply with Centennial's Green Development Program. (*Ibid*.)
296	SLOAPCD List, p. 3-19	Use clean engine technologies (e.g., alternative fuel, electrification) engines that are not subject to regulations.	Yes	Per the Centennial Green Development Program, the Project will require service fleet vehicles to be powered with alternative fuel technology where feasible, as determined by the individual Project Applicants/Developer, will promote alternative fuels for transit system, if available, and encourage use of best feasible alternative fuel technology to be used in homeowners association, refuse fleet, and other community service vehicles. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 15) Further, Project mitigation measures go well beyond the mandatory regulatory requirements with respect to the provision of EV charging infrastructure. For example, MM 11-4 requires all Project nonresidential building with 10 or more parking spaces to install Electric Vehicle Charging Spaces (EV Spaces) in accordance with CALGreen Code Section A.5.106.5.3, Nonresidential Voluntary Measures (Tier 1). This normally voluntary commitment is made a requirement of the Project by MM 11-4, thus ensuring that the Project will substantially exceed the CALGreen Code's mandatory requirements for the provision EV Spaces at nonresidential buildings. MMs 11-6 and

TABLE 4: ELECTRICITY/ENERGY CONSERVATION AND OTHER DESIGN MEASURES FOR BUILT STRUCTURES

Row	Source	Measure	Included	Response
				21-19 also expand on the existing legal requirement that three percent, but in no case less than one, of the parking spaces provided for multifamily residential buildings with 17 units or more must be constructed as EV Spaces; the Project requirement reflected in these mitigation measures if 5 percent, in accordance with CALGreen Code Tier 1 Residential Voluntary Measures. Indeed, MM 11-6 and MM 21-19 go even farther than the CALGreen Code Tier 1 voluntary measures by requiring the Project to also ensure that five percent of the total number of parking spaces in parking structures and parking lots that serve uses other than residential or nonresidential buildings, such as parks or trailheads, and which have 20 or more total spaces, are constructed as EV Spaces. In addition, MM 21-15 goes beyond the requirements of applicable law by requiring the Project to install a EV charging receptacle in every detached and attached single-residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A.4.106.4.1. Existing law – i.e., CALGreen Code Section 4.106.4.1 - merely requires that detached and attached single-family residences be wired to accommodate a EV charging receptacle to be install by the homeowner, if installed at all. Finally, existing law does not require any residential or nonresidential projects to provide electric vehicle charging stations or other form of alternative energy fueling station for low-emission or alternative fueled vehicles. The Project, however, will be required to go beyond the requirements of existing law by requiring the installation of alternative energy vehicle fueling stations (EVFS) (i.e., an electrical vehicle charging station or a station providing another new or improved technology) in the amounts set forth in MM 21-16, as revised in response to Comment F.8-95. (See response to Comment F.8-95.) Please see response to Comment F.8-95 for further discussion.

TABLE 5: RENEWABLE ENERGY

Row	Source	Measure	Included	Response
297	SJVAPCD List, p. 13	Solar design such as installing solar panels.	Yes	The Project incorporates significant on-site generation of renewable energy to serve the Specific Plan, and sufficient preparation for Project buildings to allow for generation of electricity, as follows: • A minimum of 50 percent of the Project's anticipated energy demand at buildout shall be satisfied from on-site renewable energy generation, which shall be demonstrated by plans and specifications provided by the Applicant/ Developer to the County. "Anticipated energy demand" shall be determined on the basis of the anticipated loads for each building as shown in the reports submitted at the time of building permit application pursuant to the Building Energy Efficiency Standards of Title 24. "On-site renewable energy generation" includes, but is not limited to, solar, geothermal, biofuel and hydroelectric systems. These systems shall be installed in connection with the development of one or more of the following: residential units, non-residential buildings, public buildings, or Specific Plan utility facilities located either within the Specific Plan area or within its immediate vicinity. • A minimum of 30 percent of all single-family detached and attached residential units at buildout shall have solar panel systems installed on roof areas or on top of other structures on the site (for example, patio covers or pergolas). Such systems shall be installed on roof areas facing within 30 degrees of true south. • A minimum of 30 percent of all multi-family residential units at buildout shall have solar panel systems on roof areas. Such systems shall be installed on roof areas facing within 30 degrees of true south. • A minimum of 60 percent of buildings located within Business Park land use designations at buildout shall have solar panel systems installed on roof and parking areas. Such systems shall be installed on roof areas facing within 30 degrees of true south. • A minimum of 70 percent of public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. This shall be demonstrated by plans and

TABLE 5: RENEWABLE ENERGY

Row	Source	Measure	Included	Response
				specifications provided by the Applicant/Developer to the County prior to obtaining a permit for a pool. • All residential buildings will be compatible with solar panel systems giving home buyers the option to include a photovoltaic array system as a home design system. • All commercial and residential structures include passive solar design techniques as a design guideline. • The Master Developer will request the County's support for a public financing method (e.g., PACE financing) to assist homeowners within the Specific Plan in the financing and payment of photovoltaic systems or other energy conservation improvements over time rather than as a one-time payment. If the County agrees, the Master Developer will work with County staff to implement such a program. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 15) The Project's wastewater reclamation facilities will also include equipment for capture and reuse of biogas for energy production. (*Id.,* p. 5.21-75) The project site does not have hydropower or geothermal resources, and these sources of power are therefore infeasible. Utility-scale wind plants present a potential hazard to sensitive biological resources such as the California Condor, and utility-scale solar plants are not an authorized use on the Project site or vicinity under the Antelope Valley Area Plan. (*Ibid*.)

TABLE 5: RENEWABLE ENERGY

Row	Source	Measure	Included	Response
298	SLOAPCD List, p. 3-18	Trusses for south-facing portions of roofs shall be designed to handle dead weight loads of standard solar-heated water and photovoltaic panels. Roof design shall include sufficient south-facing roof surface, based on structures size and use, to accommodate adequate solar panels. For south facing roof pitches, the closest standard roof pitch to the ideal average solar exposure shall be used.	Yes – Functional Equivalent Required	MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature, and the CALGreen Code requires that all residential houses be constructed with "solar ready" roofs, which means they must be constructed in a manner capable of accommodating solar collection systems and being wired to accept such systems. Further, the Specific Plan's Green Development Program requires that all residential buildings be compatible with solar panel systems, and that all commercial and residential structures include passive solar design techniques. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 15) It also requires the installation of onsite solar panel systems on roof areas for a minimum of 30 percent of all single-family detached and attached residential units; a minimum of 30 percent of all multi-family residential units, and a minimum of 60 percent of buildings located within Business Park land use designations. (*Ibid*.)
299	SLOAPCD List, p. 3-19	Utilize onsite renewable energy systems (e.g., solar, wind, geothermal, low-impact hydro, biomass and bio-gas).	Yes	The Project will incorporate significant on-site generation of renewable to serve the Specific Plan, and sufficient preparation for Project buildings to allow for generation of electricity, as discussed in row 297.
300	BAAQMD List, p. 4-16	Install solar panels on residential and commercial buildings	Yes	The Project includes the installation of solar panels on residential and commercial buildings, as discussed in row 297.
301	SMAQMD List, p. 11	Onsite Renewable energy. Establish on-site renewable energy. (No Ozone Precursor reduction if NOx intensity is higher than electric utility)	Yes	The Project incorporates significant on-site generation of renewable energy to serve the Specific Plan, as discussed in row 297.

TABLE 5: RENEWABLE ENERGY

Row	Source	Measure	Included	Response
302	CAPCOA List, p. B-23	On-Site Renewable Energy System**:** Project provides onsite renewable energy system(s). Nonpolluting and renewable energy potential includes solar, wind, geothermal, low-impact hydro, biomass and bio-gas strategies. When applying these strategies, projects may take advantage of net metering with the local utility.	Yes	The Project incorporates significant on-site generation of renewable energy to serve the Specific Plan, as discussed in row 297.
303	2008 OPR List, p. 19	Incorporate on-site renewable energy production, including installation of photovoltaic cells or other solar options.	Yes	The Project incorporates significant on-site generation of renewable energy to serve the Specific Plan, as discussed in row 297.
304	AG List, pp. 4-7	Renewable Energy and Energy Storage 1) Meet "reach" goals for building energy efficiency and renewable energy use. (The AG identifies "zero net energy" as an example of a "reach" goal.) 2) Install solar, wind, and geothermal power systems and solar hot water heaters. 3) Install solar panels on unused roof and ground space and over carports and parking areas. 4) Where solar systems cannot feasibly be incorporated into the project at the outset, build "solar ready" structures. 5) Incorporate wind and solar energy systems into agricultural projects where appropriate.	Yes, and/or Functional Equivalent Required	1. MMs 21-2 and 21-3 further obligate the Project to comply with CALGreen voluntary measure A5.203.1.2.1, which requires newly constructed low-rise residential buildings to exceed the 2016 Title 24 energy efficiency requirements by 15 percent, and newly constructed nonresidential buildings to exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (DRP 2017, pp. 5.21-88, -89) It has been California policy that all new residential buildings will be zero net energy (ZNE) by 2020 and new commercial buildings will be ZNE by 2030, as described in the 2008 California Public Utilities Commission (CPUC) long-term energy efficiency strategic plan. In 2013, the California Energy Commission (CEC), in coordination with the CPUC, commenced a process to update the California Building Energy Efficiency Standards (Title 24) and, in 2016, the CEC updated the Title 24 Building Energy Efficiency Standards to establish building design and construction requirements that move closer to achieving California's ZNE goals, with the next update scheduled for 2019. As part of 2019 Building Energy Efficiency Standards rulemaking process, CEC staff has currently determined that ZNE cannot be achieved by 2020 within the confines of existing net energy metering and life cycle costing

TABLE 5: RENEWABLE ENERGY

Row	Source	Measure	Included	Response
		6) Include energy storage where appropriate to optimize renewable energy generation systems and avoid peak energy use. 7) Use on-site generated biogas, including methane, in appropriate applications. 8) Use combined heat and power (CHP) in appropriate applications.		rules.[2203, 2204] CEC staff has also determined that the State's ZNE goals cannot be achieved until California develops and implements electric grid harmonization strategies that maximize self-utilization of photovoltaic array output and minimize renewable energy exports back to the grid, such as commercially viable battery storage, demand response, thermal storage technologies.[2205,2206] California has, however, continued to make substantial progress toward achieving its ZNE policy, including most recently the CEC's decision to require solar panels on rooftops of most types of new residential buildings.[2207] These and additional future building code standards updates, which must also take into account all applicable statutory building code standards mandates, such as consumer cost effectiveness, are expected to continue the State's trajectory toward achieving its ZNE policy. 2. The Project incorporates significant on-site generation of renewable energy to serve the Specific Plan, including extensive solar generation and equipment for capture and reuse of biogas for energy production at the Projects wastewater treatment facilities, as discussed in more detail in row 297. 3. The Project's on-site renewable energy generation systems shall be installed in connection with the development of one or more of the following: residential units, non-residential buildings, public buildings, or Specific Plan utility facilities located either within the Specific Plan

2203 California Energy Commission, 2019 Building Energy Efficiency Standards PreRulemaking Presentation - Proposed 2019 Building Energy Efficiency Standards ZNE Strategy (Aug. 24, 2017), http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-01/TN220876_20170824T105443_82217_ZNE_Strategy_Presentation.pdf.

2204 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

2205 *Ibid*.

2206 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

2207 California Energy Commission Initial Statement of Reasons for Proposed Building Standards of the California Energy Commission Regarding Code of Regulations, Title 24, Part 1, Chapter 10 and Part 6 (2010 California Energy Code) Docket Number 17-BSTD-02

TABLE 5: RENEWABLE ENERGY

Row	Source	Measure	Included	Response
				area or within its immediate vicinity. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 15) 4. The Project does incorporate solar generation facilities into construction at the outset, as discussed above in this row and further in row 297. Further, MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature, and the CALGreen Code requires that all residential houses be constructed with "solar ready" roofs, which means they must be constructed in a manner capable of accommodating solar collection systems and being wired to accept such systems. 5. The Project is not an agricultural Project. However, it does incorporate renewable energy production as discussed in this row and in row 297. 6. Project solar generation infrastructure will provide for the collection, storage, and distribution of solar energy for heating and cooling. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 19; *Id.,* Appendix 1-A to Appendix 4.0-A, p. 8) 7. The Project's two water reclamation facilities (WRF) will include equipment to capture and reuse biogas for energy production, and this shall be demonstrated by plans and specifications provided by the Applicant/Developer to the County. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 16) 8. Uses associated with the Project are subject to appliance efficiency requirements for heaters and air conditioners. (Title 20 Standards, Sections 1605.1(b),(c),(d),(e), 1605.3(b),(c),(d),(e) as applicable.) MM 21-8 requires that Energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission requirements or ENERGY STAR requirements, or equivalent, shall be exclusively offered by residential builders, and this includes room air conditioners. (DRP 2017, p. 5.21-90) See also the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 18) Buildings will also be required to use timed or

TABLE 5: RENEWABLE ENERGY

Row	Source	Measure	Included	Response
				smart remote communicating thermostats in residential and nonresidential buildings, including meeting applicable integration requirements for response signals from the electric utility. (*Id.,* p. 20) All Project buildings will include appropriately sized and high-efficiency heating and cooling systems. (*Id.,* Appendix 4.0-A, p. 3-62) The Project Applicant shall also maintain a community website that includes information about energy conservation and financial incentive programs, and about potential energy technology systems that may be suitable for larger commercial and institutional users such as combined heat and power systems.

TABLE 6: WASTE MANAGEMENT MITIGATION MEASURES

Row	Source	Measure	Included	Response
305	CAPCOA List, p. B-32	Recycle Demolished Construction Material. Recycle/Reuse demolished construction material.	Yes	With regard to construction waste, the Master Developer shall provide the County with a plan and monitoring program that commits to diverting from landfill disposal 100 percent of soil during grading activities, and at least 75 percent of nonhazardous construction and demolition waste, which exceeds the 65 percent diversion requirement with the Tier 1 voluntary measure in Section A5.408.3.1 of the 2016 California Green Building Standards (CALGreen) Code. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 25) This goal also exceeds the 50 percent reduction required by Section 20.87.040 of the County Code and Sections 4.408.5/5.408.1.4 of the CALGreen Code.
306	SMAQMD List, p. 12	Institute recycling and composting services. Project recycles, reduces, and reuses.	Yes	The Project exceeds requirements to recycle construction debris, as discussed in row 305. The Project will also implement the residential and nonresidential mandatory measures for material conservation and efficiency that are set forth in Division 4 (residential) and division 5.4 (nonresidential) of the CALGreen Code, including but not limited to: • The CC&Rs will require the Property Owner to recycle and divert from the waste bin, solids such as metal, glass, paper, plastic, cardboard, food, and yard waste; and divert from the waste bin hazardous waste, electronic waste, and universal waste. Information on items prohibited from landfill disposal on recycling and composting will be provided to Property Owners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 25) • Prior to the issuance of each building permit from commercial properties, including multi-family residences, schools, and places of worship, the Property Owner shall submit to the County a site plan of the property that depicts how solid wastes would be collected and stored for on-site processing, curbside collection, and/or self-hauling. (*Ibid*.) • Prior to sale, lease, or rental of any commercial property, including multi-family residential structures or portions thereof, the Property Owner shall provide to each prospective purchaser or tenant a notice explaining how that property collects and stores recyclables, compostables, universal waste, hazardous waste, and

TABLE 6: WASTE MANAGEMENT MITIGATION MEASURES

Row	Source	Measure	Included	Response
				electronic waste for on-site processing, curbside collection, and/or self-hauling. (*Ibid*.) The Project Applicant/Master Developer shall set aside a minimum of 5 acres for a future Materials Recovery Facility/Transfer Station that includes a household, hazardous waste permanent collection and reuse center and allows for mulching/composting operations. (*Ibid*.) The Project also requires the establishment and operation of a community waste recycling program including education and outreach, recycled waste pickup and drop-off services. (*Ibid*.)
307	BAAQMD List, p. 4-19	Provide composting facilities at residential uses	Yes	The Project includes provisions for composting at residential uses, as discussed in row 306. The Project Applicant/Master Developer shall also set aside a minimum of 5 acres for a future Materials Recovery Facility/Transfer Station that allows for mulching/composting operations. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 25.)
308	BAAQMD List, p. 4-19	Create food waste and green waste curb-side pickup service	Yes	The Project includes provisions for food waste and green waste pick-up, as discussed in row 306.
309	BAAQMD List, p. 4-19	Require the provision of storage areas for recyclables and green waste in new construction	Yes	The Project includes provisions for storage areas for recyclable and green waste, as discussed in row 306.
310	2008 OPR List, p. 20	Create incentives to increase recycling and reduce generation of solid waste by residential users. Implement a Construction and Demolition Waste Recycling Ordinance to reduce the solid waste created by new development. Add residential/commercial food waste collection to existing greenwaste collection programs.	Yes	The County of Los Angeles does require construction and demolition waste recycling, and the Project exceeds these requirements. The Master Developer shall provide the County with a plan and monitoring program that commits to diverting from landfill disposal 100 percent of soil during grading activities, and at least 75 percent of nonhazardous construction and demolition waste, which exceeds the 65 percent diversion requirement with the Tier 1 voluntary measure in Section A5.408.3.1 of the California Green Building Standards (CALGreen) Code. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 25) This goal also exceeds the 50 percent reduction required by Section 20.87.040 of the County Code and Sections 4.408.5/5.408.1.4 of the CALGreen Code.

TABLE 6: WASTE MANAGEMENT MITIGATION MEASURES

Row	Source	Measure	Included	Response
				The CC&Rs will require the Property Owner to recycle and divert from the waste bin, solids such as metal, glass, paper, plastic, cardboard, food, and yard waste; and divert from the waste bin hazardous waste, electronic waste, and universal waste. Information on items prohibited from landfill disposal on recycling and composting will be provided to Property Owners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 25) The Project also requires the establishment and operation of a community waste recycling program including education and outreach, recycled waste pickup and drop-off services. (*Ibid*.)
311	AG List, p. 9	<u>Solid Waste Measures</u> 1. Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). 2. Integrate reuse and recycling into residential industrial, institutional and commercial projects. 3. Provide easy and convenient recycling opportunities for residents, the public, and tenant businesses. 4. Provide education and publicity about reducing waste and available recycling services.	Yes	1. The County of Los Angeles does require construction and demolition waste recycling, and the Project exceeds these requirements. The Master Developer shall provide the County with a plan and monitoring program that commits to diverting from landfill disposal 100 percent of soil during grading activities, and at least 75 percent of nonhazardous construction and demolition waste, which exceeds the 65 percent diversion requirement with the Tier 1 voluntary measure in Section A5.408.3.1 of the California Green Building Standards (CALGreen) Code. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 25) This goal also exceeds the 50 percent reduction required by Section 20.87.040 of the County Code and Sections 4.408.5/5.408.1.4 of the CALGreen Code. 2-3 The Project will incorporate easy and accessible recycling opportunities, as discussed in row 306. AB 341 also mandates commercial recycling for some uses. 4. The Project requires the establishment and operation of a community waste recycling program including education and outreach, recycled waste pickup and drop-off services. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 25) Prior to sale, lease, or rental of any commercial property, including multi-family residential structures or portions thereof, the Property Owner shall provide to each prospective purchaser or tenant a notice explaining how that property collects and stores recyclables, compostables, universal waste, hazardous waste, and electronic waste for on-site processing, curbside collection, and/or self-hauling. (*Ibid*.)

TABLE 6: WASTE MANAGEMENT MITIGATION MEASURES

Row	Source	Measure	Included	Response
312	CAPCOA List, p. B-20	Enhanced Recycling/Waste Reduction, Reuse, Composting. Provide infrastructure/education that promotes the avoidance of products with excessive packaging, recycle, buying of refills, separating of food and yard waste for composting, and using rechargeable batteries.	Yes	The CC&Rs will require the Property Owner to recycle and divert from the waste bin, solids such as metal, glass, paper, plastic, cardboard, food, and yard waste; and divert from the waste bin hazardous waste, electronic waste, and universal waste. Information on items prohibited from landfill disposal on recycling and composting will be provided to Property Owners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 25) The Project also requires the establishment and operation of a community waste recycling program including education and outreach, recycled waste pickup and drop-off services. (*Ibid*.)

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
313	AG List, p. 8	Devise a comprehensive water conservation strategy appropriate for the project and location.	Yes	Per the Centennial Green Development Program, the Project will implement the Residential Mandatory Measures and Nonresidential Mandatory Measures for water efficiency and conservation set forth in Division 4.3 and 5.3 of the CALGreen Code or the County CALGreen Code, whichever are more stringent, and including applicable emergency regulations and subsequent amendments. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 22) The water service provider will also implement tiered, conservation-based water service rates based on applicable indoor and outdoor water use performance standards. (*Ibid*.) The Project will install, maintain and monitor all non-construction potable and non-potable water use using appropriate metering equipment, such as smart meter or dual meter, throughout the site, and will install, maintain, and operate onsite wastewater treatment and conveyance facilities that provide recycled water treated to California Title 22 unrestricted reuse standards from onsite wastewater. (*Ibid*.) The Project also requires the preparation and submittal to the Los Angeles County Department of Regional Planning of a water use report to verify that applicable indoor and outdoor water use performance standards are being achieved: (1) at the end of the 5th year following first occupancy or occupancy of the 4,000th dwelling unit; and (2) at the end of the 10th year following first occupancy or occupancy of the 10,000th dwelling unit, whichever occurs latest, and implement response measures as required to the satisfaction of the County, to ensure that water use performance standards are being achieved and that available supplies will be sufficient to meet future demand. Response measures may include, without limitation, tiered water service rate enhancements, surcharges, additional enforcement, water system repairs or upgrades and securing supplemental water from sources such as inter-basin groundwater transfers or new imported water supplies. Provide real-time water consumption data to residents and businesses from service provider to monitor usage. (*Ibid*.) The owners of all single-family and multi-family residential units shall also be required, upon resale, to present to the buyer a written water audit checklist at the time the seller provides the buyer with the Real

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
				Estate Transfer Disclosure Statement required by California Civil Code, Section 1102 et seq. The water audit checklist shall certify by a qualified 3rd party at the expense of seller that all low water use appliances, plumbing fixtures, and landscape irrigation systems are the same as those originally installed or, if changed, otherwise comply with the water efficiency standards set forth in Centennial's Green Development Program. The CC&Rs of the master homeowners association or other applicable association shall require compliance with the provisions of this measure and shall provide notice to individual owners of the resale water audit checklist requirement. The master homeowners association or other applicable association shall monitor compliance and provide the County with an annual report of compliance with this measure. (*Ibid*.) The project will implement a water wise program, managed by the service provider, that includes all feasible measures to reduce indoor water use and associated energy use, including but not limited to implementing the Indoor Plumping Fixtures and Appliances measures identified in the Centennial Green Development Program (discussed in the paragraph below this one) in addition to the following indoor water use performance standards: • Residential indoor water use--45 gallons per capita per day; • Commercial indoor water use--200 gallons per day per thousand square feet; • Business Park indoor water use--65 gallons per day per thousand square feet, of which approximately 30 percent will be supplied by using recycled water for indoor wastewater and cooling purposes by buildout and full occupancy; • Institutional indoor water use--65 gallons per day per thousand square feet • Hotel indoor water use--125 gallons per day per room. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 23)

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
				Per the Centennial Green Development Program, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that nonresidential building shall be constructed with indoor plumbing fixtures and fixture fittings that would reduce the overall use of potable water within the building by 12 percent, consistent with CALGreen Tier 1 nonresidential voluntary measures as prescribed in Section A5.303.2.3.1 of the code. Additionally, water efficient fixtures that meet or exceed state or County CALGreen Code performance shall be installed, including but not limited to the following: For non-residential buildings: • Showerheads 2.0 gpm @ 80 psi; • Bathroom faucets 0.5 gpm @ 60 psi; • Kitchen faucets 2.6 gpm @ 60 psi; • Toilets 1.28 gallons/flush; • Urinals 0.5 gallons/flush For single family and multifamily residential buildings: • Kitchen Faucets. The maximum flow rate of kitchen faucets shall not exceed 1.5 gallons per minute at 60 psi. Kitchen faucets may temporarily increase the flow above the maximum rate, but not to exceed 2.2 gallons per minute at 60 psi, and must default to a maximum flow rate of 1.5 gallons per minute at 60 psi. • Appliances. Dishwashers and clothes washers in residential buildings shall comply with the following: Install at least one qualified ENERGY STAR appliance with maximum water use as follows: 1. Standard Dishwashers – 4.25 gallons per cycle. 2. Compact Dishwashers – 3.5 gallons per cycle. 3. Clothes Washers – water factor of 6 gallons per cubic feet of drum capacity. (*Ibid*.) The Project also requires the installation of water-efficient major appliances (washers, dryers, dishwashers) in compliance with the

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
				California Appliance Efficiency Regulations, Energy Star, or other applicable standards, and monitoring and implementing California Energy Commission guidelines and regulations for water efficient appliances, for both residential and non-residential uses. (*Ibid*.)
314	AG List, p. 8	Design buildings to be water-efficient. Install water-efficient fixtures and appliances.	Yes	The Project requires the installation of water-efficient major appliances (washers, dryers, dishwashers) in compliance with the California Appliance Efficiency Regulations, Energy Star, or other applicable standards, and monitoring and implementing California Energy Commission guidelines and regulations for water efficient appliances, for both residential and non-residential uses. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 23) Other water efficiency measures incorporated into the Project are discussed in row 313.
315	SMAQMD List, p. 11	Apply Water Conservation Strategy. Reduce indoor and outdoor water use.	Yes	The Project incorporate numerous requirements for water conservation that would substantially reduce indoor and outdoor water use, as discussed in row 313.
316	SMAQMD List, p. 11	Indoor Water Use. Install low-flow bathroom faucet, kitchen faucet, toilet, shower. Reduce indoor water use with low-flow fixture.	Yes	The Project requires the installation of water-efficient major appliances (washers, dryers, dishwashers) in compliance with the California Appliance Efficiency Regulations, Energy Star, or other applicable standards, and monitoring and implementing California Energy Commission guidelines and regulations for water efficient appliances, for both residential and non-residential uses. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 23) Per the Centennial Green Development Program, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that nonresidential building shall be constructed with indoor plumbing fixtures and fixture fittings that would reduce the overall use of potable water within the building by 12 percent, consistent with CALGreen Tier 1 nonresidential voluntary measures as prescribed in Section A5.303.2.3.1 of the code. Additionally, water efficient fixtures that meet or exceed state or County CALGreen Code performance shall be installed, including but not limited to the following:

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
				For non-residential buildings: • Showerheads 2.0 gpm @ 80 psi; • Bathroom faucets 0.5 gpm @ 60 psi; • Kitchen faucets 2.6 gpm @ 60 psi; • Toilets 1.28 gallons/flush; • Urinals 0.5 gallons/flush For single family and multifamily residential buildings: • Kitchen Faucets. The maximum flow rate of kitchen faucets shall not exceed 1.5 gallons per minute at 60 psi. Kitchen faucets may temporarily increase the flow above the maximum rate, but not to exceed 2.2 gallons per minute at 60 psi, and must default to a maximum flow rate of 1.5 gallons per minute at 60 psi. • Appliances. Dishwashers and clothes washers in residential buildings shall comply with the following: Install at least one qualified ENERGY STAR appliance with maximum water use as follows: 1. Standard Dishwashers – 4.25 gallons per cycle. 2. Compact Dishwashers – 3.5 gallons per cycle. 3. Clothes Washers – water factor of 6 gallons per cubic feet of drum capacity. (*Ibid*.)
317	BAAQMD List, p. 4-19	Install low-water use appliances and fixtures	Yes	The Project requires low-water appliances and fixtures, as set forth in row 316.
318	CAPCOA List, p. B-30	Water Use Appliances**.** Require the installation of low-water use appliances.	Yes	The Project requires low-water appliances and fixtures, as set forth in row 316.

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
319	SMAQMD List, p. 12	Reduce turf in landscapes and lawns. Use less turf than normal projects	Yes	This is required by the County's drought-tolerant landscaping requirements, which specify that a maximum of 25 percent of landscaped areas may be turf grass. (DRP 2017, p. 5.21-36) Accordingly, per the Centennial Green Development Program, the Project will require that landscaped areas of single-family detached residential front yards and multi-family residential common areas contain no more than 25 percent turf grass and that landscaped commercial areas may include turf only if irrigated with recycled water. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 27)
320	AG List, p. 8	Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.	Yes	Per the Centennial Green Development Program, the Project will design irrigation systems to conform to the hydrozones of the landscape design plan and optimize water efficiency by matching plant type, utilizing drip or subsurface irrigation wherever possible, and applying water at agronomic rates. Additionally, require: • "Smart" controllers, such as weather-based irrigation controllers or other self-adjusting irrigation controllers, for all irrigation systems that will accommodate all aspects of the landscape and irrigation design plans. (DRP 2017, Appendix 2.0-A to Appendix 4.0-A, p. 24) • Irrigation equipment with a minimum 0.80 outdoor irrigation efficiency shall be used for all public park and private park irrigation. (*Ibid*.) • Irrigation equipment with a minimum 0.81 outdoor irrigation efficiency for all recreation and entertainment land use, arterial roadway and slope irrigation. (*Ibid*.) • Low water use plants shall be used within all irrigated slope areas with an average plant factor, as defined in the Model Water Efficient Landscape Ordinance (DWR 2015), of 2.0. (*Ibid*.) • Water Smart/Evapotranspiration (ET) controllers or equivalent shall be used for outdoor irrigation. Require use of CARB-approved or electric landscape maintenance equipment for public common areas. (*Ibid*.)

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
321	SMAQMD List, p. 12	Use water-efficient irrigation systems. Install a smart irrigation control system.	Yes	The Project incorporates water-efficient and smart irrigation systems, as discussed in row 320.
322	BAAQMD List, p. 4-19	Restrict the use of water for cleaning outdoor surfaces/Prohibit systems that apply water to non-vegetated surfaces	Yes – Functional Equivalent Required	The use of outdoor water is restricted. Per the Centennial Green Development Program, Outdoor water use will be limited to 45 percent of the reference evapotranspiration rate of 64.15 inches. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 23) Further, all Specific Plan wastewater shall be treated onsite, and provided to and be required to be used for 100 percent of outdoor irrigation uses by commercial, business park, institutional, school, hotel, park, slope, recreational/entertainment and arterial roadway outdoor irrigation demand. (*Id.,* p. 24)
323	AG List, p. 7	Incorporate water-reducing features into building and landscape design.	Yes	Per the Centennial Green Development Program, the Project will construct 60 percent of the public and OA trails (Project Greenway Trails will be 80 percent) with permeable materials that allow the movement of water around the paving materials to allow precipitation to percolate through the paving system to the soil below. (DRP 2017, Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 10) As discussed in the Specific Plan, to be water-sensitive, the Project landscape concepts utilize a plant palette that is tailored to the unique, desert environmental conditions, borrows extensively from the existing landscape, allowing for both native and adapted species. Any plants selected for planting must be able to survive hot, dry summers and windy conditions without high irrigation demands. (*Id.,* Appendix 4.0-A, p. 3-42) The Project also incorporates low-water fixtures and appliances into building design, as discussed in rows 313 through 316.
324	BAAQMD List, p. 4-19	Implement water-sensitive urban design practices in new construction	Yes	Per the Centennial Green Development Program, the Project will construct 60 percent of the public and OA trails (Project Greenway Trails will be 80 percent) with permeable materials that allow the movement of water around the paving materials to allow precipitation to percolate through the paving system to the soil below. (DRP 2017, Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 10) As discussed in the Specific Plan, to be water-sensitive, the Project landscape concepts utilize a plant palette that is tailored to the unique, desert environmental conditions,

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
				borrows extensively from the existing landscape, allowing for both native and adapted species. Any plants selected for planting must be able to survive hot, dry summers and windy conditions without high irrigation demands. (*Id.,* Appendix 4.0-A, p. 3-42) The Project also incorporates low-water fixtures and appliances into building design, as discussed in rows 313 through 316.
325	BAAQMD List, p. 4-19	Install rainwater collection systems in residential and Commercial Buildings	No – Not Feasible and Not Required to Reduce Impact.	The Project will already make use of reclaimed water as part of the Centennial Wastewater Management Plan discussed below in rows 326 through 328. Further, installing rainwater collection systems would interfere with desirable, natural drainage that would recharge groundwater. The Project will control erosion and manage stormwater within landscape, water supply, and drainage features through the implementation of an integrated water resources management program that includes management of raw water, potable water, wastewater, recycled water, groundwater recharge, and stormwater management. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 12) See also row 329.
326	AG List, p. 8	Make effective use of graywater. (Graywater is untreated household waste water from bathtubs, showers, bathroom wash basins, and water from clothes washing machines. Graywater to be used for landscape irrigation.)	Yes	As noted in the Centennial Green Building Development Program, the Project will Implement the Centennial Wastewater Management Plan (Centennial Specific Plan Section 3.5), and construct two wastewater reclamation facilities (WRF) to provide on-site treatment of all wastewater generated in the Specific Plan, to be located on each side of the California Aqueduct. (DRP 2017, Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 12) The West WRF shall have an average daily capacity of 0.3 million gallons per day and the East WRF shall have an average daily capacity of 3.2 million gallons per day. (*Ibid*.) The Project will then use recycled water from on-site wastewater treatment plant(s) as a permanent source of water for landscaped common areas and other authorized uses, if available. (*Ibid*.) The Applicant/Developer shall provide plans and specifications to the County demonstrating that nonresidential, multifamily, and very low and low single-family buildings shall be constructed with recycled water infrastructure to serve common areas for these facilities, except where prohibited by law. To the extent recycled water is produced within the

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
				Project and available, recycled water shall be used for landscape irrigation within those common areas. Covenants, conditions and restrictions (CC&Rs) shall require the owners of such common areas to maintain, repair and replace irrigation systems and plantings in accordance with County approved plans. (*Ibid*.) The water will be required to be used for the following uses: • Indoor wastewater and cooling use for business park commercial users, except where prohibited by applicable law for particular types of areas or uses (e.g., employee cafeterias) • 100 percent of outdoor irrigation uses by commercial, business park, institutional, school, hotel, park, slope, recreational/ entertainment and arterial roadway outdoor irrigation demand • 50 percent of total very low density residential lot outdoor irrigation demand • 45 percent of total outdoor irrigation demand in low density lots of at least 7,000 square feet in area
327	SMAQMD List, p. 11	Use Reclaimed Water – Project uses non-potable water. Use Grey Water – Project reuses onsite water.	Yes	The Project will provide facilities for water reclamation and make extensive use of it on the Project site, as discussed in row 326.
328	BAAQMD List, p. 4-18	Provide necessary infrastructure and treatment to allow use of 50 percent greywater/recycled water in residential and commercial uses for outdoor irrigation.	Yes	The Project provides necessary infrastructure to reclaim water, as discussed in row 326. The water will be required to be used for the following uses: • Indoor wastewater and cooling use for business park commercial users, except where prohibited by applicable law for particular types of areas or uses (e.g., employee cafeterias) • 100 percent of outdoor irrigation uses by commercial, business park, institutional, school, hotel, park, slope, recreational/ entertainment and arterial roadway outdoor irrigation demand

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
				• 50 percent of total very low density residential lot outdoor irrigation demand • 45 percent of total outdoor irrigation demand in low density lots of at least 7,000 square feet in area. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 24)
329	AG List, p. 8	Implement low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water runoff on- site can drastically reduce the need for energy-intensive imported water at the site.)	Yes	The Project will comply with the County of Los Angeles Low Impact Development Standards Manual. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 14) The overall physical design for Centennial respects the natural setting by preserving major drainage features and open space through careful grading that respects the topography, which in turn allows for compact development that maximizes open space. (*Id.,* Appendix 2-B to Appendix 4.0-A, p. 7) Stormwater management methods will include a complementary combination of on-site treatment, traditional underground storm drainage facilities, multi-purpose storm-water basins, and drainage courses. (*Id.,* Appendix 4.0-A, p. 2-58) Multi-purpose greenway basins will filter urban runoff and excess storm flow recharge associated with development's inevitable increase in impermeable surfaces. (*Ibid*.) Additional techniques will include, but are not limited to, filter strips, bioretention areas, and swales in parkways, all of which can incrementally reduce runoff and improve water quality. (*Ibid*.) See Centennial Specific Plan Section 3.6, Drainage Plan, for further information. The Project will also control erosion and manage stormwater within landscape, water supply, and drainage features through the implementation of an integrated water resources management program that includes management of raw water, potable water, wastewater, recycled water, groundwater recharge, and stormwater management. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 12)
330	AG List, p. 9	Provide education about water conservation and available programs and incentives.	Yes	Per the Centennial Green Development Program, the Project's community website will have information about water conservation and efficiency for project residents, customers, tenants and large energy users. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 21)

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
331	AG List, p. 9	Offset water demand from new projects so that there is no net increase in water use.	Yes – Functional Equivalent Required	The Project would offset some Project water demand by the use of groundwater that is currently used for Tejon Ranch's ongoing agricultural operations, because Project development would replace existing agricultural uses on the site. (DRP 2017, Appendix 5.18-A, Centennial Specific Plan Water Supply Assessment). While not all water demand will be offset such that there is no net increase in water use, the Project has demonstrated the availability of sufficient water supplies to meet Project demand, and the Project's water demand will be both reliably and sustainably met. The Project's water supplies are discussed in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. Project recycled water use is discussed on p. 5.18-67 of the Draft EIR and in Section 5.19, Wastewater Collection and will be generated by the treatment of indoor wastewater in onsite facilities to California Title 22 standards. As shown in Draft EIR Table 5.18-10, at buildout these facilities will produce approximately 4,577 acre feet per year of recycled water and will meet 40 percent of total Project water demand. The Project's use of State Water Project (SWP) supplies is discussed on pages 5.18-62 to 5.18-64, and the delivery reliability of these supplies is discussed on pages 5.18-20 to 5.18-28 and 5.18-54 to 5.18-64 of the Draft EIR. Other water supplies that will be used by the Project include recycled water, groundwater and return flows from urban use in the Antelope Valley Basin in accordance with the Adjudication Judgment and Physical Solution entered by the Superior Court in December 2015, certain supplies from the Antelope Valley-East Kern Water Agency to be provided as repayment for water provided to the Agency in prior years. As shown in Table 5.18-10, taking account of the anticipated average annual delivery reliability of SWP supplies to the Antelope Valley (*Id.,* pp. 5.18-20 to 5.18-28 and 5.18-54 to 5.18-64), on average SWP water will be used to meet 37 percent of total Project buildout demand and 63 percent of Project water demand will be met by using other water supplies. The Project's use of 1,634 acre-feet per year of groundwater, production of imported water return flows from urban

TABLE 7: WATER CONSERVATION AND EFFICIENCY

Row	Source	Measure	Included	Response
				water use in the Antelope Valley Basin, and water banking operations in the Antelope Valley will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution, which was approved by the Superior Court in December 2015 to sustainably manage Antelope Valley groundwater resources over time (*Id.,* Appendix 5.18-D).

TABLE 8: AGRICULTURE, FORESTRY, AND URBAN FORESTRY

Row	Source	Measure	Included	Response
332	AG List, p. 11	Preserve and create open space and parks. Preserve existing trees, and plant replacement trees at a set ratio.	Yes	The Project preserves large swaths of natural landscape and biological resource areas. Approximately 5,624 acres (approximately 45.6 percent) of the 12,323-acre Project site are proposed for Open Space for natural resource protection and greenways, and parks for active and passive recreational use. (DRP 2017, p. 4-6) The Project is subject to the Los Angeles County Tree Planting Ordinance, which includes requirements for new development projects to plant new trees at a rate of 1 tree for every 5,000 square feet of building footprint per lot for primarily residential projects with more than 4 units, and 3 trees for every 10,000 square feet of developed lot area for non-residential and mixed use. (*Id.,* pp. 5.21-36, 5.21-37) Trees planted must (1) provide adequate shade; (2) be resistant to local pests and diseases; (3) be non-invasive species; and (4) be appropriate for the planting location, pursuant to Section 22.56.2100 of the ordinance. (*Id.,* p. 5.21-37) Per the Centennial Green Development Program, the Project will reduce heat loads from glazing by strategically locating shade trees. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20) The planting of an estimated 35,123 new trees, as required by the County Tree Planting Ordinance would result in an estimated long-term sequestration of 24,867 metric tons of carbon dioxide equivalent (MTCO2e). This is a conservative analysis, as it is likely that many more trees would be planted than the minimum required by the County ordinance. (*Id.,* p. 5.21-83)
333	AG List, p. 17	Require best management practices in agriculture and animal operations to reduce emissions, conserve energy and water, and utilize alternative energy sources, including biogas, wind and solar.	Yes	The Project would not include large-scale, high-emission agricultural operations, and the planned small, local operations would have very low emissions and would provide carbon sequestration benefits. Rather, Per PDF 5-1, the Project would accommodate 50 acres of small-scale agriculture and related uses, including, but not limited to community gardens, farmers markets/produce stands, growing and sales of nursery stocks, and commercial greenhouses. (DRP 2017, p. 5.5-12)

TABLE 8: AGRICULTURE, FORESTRY, AND URBAN FORESTRY

Row	Source	Measure	Included	Response
334	AG List, p. 17	Preserve forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas and other open space that provide carbon sequestration benefits.	Yes	Per the Centennial Green Development Program, the Project will "Preserve existing oak woodlands, savannahs, and other sensitive habitat areas as indicated in the Specific Plan and EIR by including these habitat areas in the Open Space designation. Specifically, preserve oak woodlands, savannahs, and other sensitive habitat areas near Oso Canyon and at the foot of the San Gabriel Mountains southerly of SR-138." (DRP 2017, Appendix 2-A to Appendix 4.0-A, at p. 12) The Project would not include large-scale, high-emission agricultural operations, and the planned small, local operations would have very low emissions and would provide carbon sequestration benefits. Per PDF 5-1, the Project would accommodate 50 acres of small-scale agriculture and related uses, including, but not limited to community gardens, farmers markets/produce stands, growing and sales of nursery stocks, and commercial greenhouses. (*Id.,* p. 5.5-12)
335	AG List, p. 17	Protect existing trees and encourage the planting of new trees. Adopt a tree protection and replacement ordinance.	Yes	The Project is subject to the Los Angeles County Tree Planting Ordinance, which includes requirements for new development projects to plant new trees at a rate of 1 tree for every 5,000 square feet of building footprint per lot for primarily residential projects with more than 4 units, and 3 trees for every 10,000 square feet of developed lot area for non-residential and mixed use. (DRP 2017, pp. 5.21-36, 5.21-37) Trees planted must (1) provide adequate shade; (2) be resistant to local pests and diseases; (3) be non-invasive species; and (4) be appropriate for the planting location, pursuant to Section 22.56.2100 of the ordinance. (*Id.,* p. 5.21-37) Per the Centennial Green Development Program, the Project will reduce heat loads from glazing by strategically locating shade trees. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20) The planting of an estimated 35,123 new trees, as required by the County Tree Planting Ordinance would result in an estimated long-term sequestration of 24,867 metric tons of carbon dioxide equivalent (MTCO2e). This is a conservative analysis, as it is likely that many more trees would be planted than the minimum required by the County ordinance. (*Id.,* p. 5.21-83)

TABLE 8: AGRICULTURE, FORESTRY, AND URBAN FORESTRY

Row	Source	Measure	Included	Response
336	SLOAPCD List, p. 3-17	Provide shade tree planting in parking lots to reduce evaporative emissions from parked vehicles. Design should provide 50 percent tree coverage within 10 years of construction using low ROG emitting, low maintenance native drought resistance trees.	Yes	The Centennial Specific Plan contains parking lot landscaping guidelines that require minimum 4-foot by –foot area per tree, measured from the inside of the planter area, and minimum one 15-gallon tree is required for 10 parking spaces. (DRP 2017, Appendix 4.0-A, p. 2-66) The Specific Plan also contains parking lot landscape coverage minimums for individual Land Use Designations, which are in addition to general minimum landscape coverage requirements in the commercial/employment designations and Business Park designation (*Id.,* pp. 2-28, 2-32). The Specific Plan also specifies that for Commercial Centers, parking lots should be landscaped to provide shade. (*Id.,* p. 3-32) The Centennial landscape concepts utilize a plant palette that is tailored to the unique high desert environmental conditions. This plant palette borrows extensively from the existing landscape, allowing for both native and adapted species of pine, oak, willow, cottonwood, and grasses. Species selected for planting should be adapted to the conditions found on the Project site, and they must be able to survive hot, dry summers and windy conditions without high irrigation demands. (*Id.,* Appendix 4.0-A, p. 3-42) Per the Los Angeles County Green Building Standards Code, the County's drought-tolerant landscaping requirements establish minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. (*Id.,* p. 5.21-36) The Project is subject to the Los Angeles County Tree Planting Ordinance, which includes requirements for new development projects to plant new trees in parking lots larger than 15 spaces, including a requirement to demonstrate at least 50 percent coverage within 15 years of construction. (See Los Angeles County Department of Regional Planning Tree Planting Guide, available at: http://planning.lacounty.gov/assets/upl/project/tpo_guide.pdf.)

TABLE 8: AGRICULTURE, FORESTRY, AND URBAN FORESTRY

Row	Source	Measure	Included	Response
337	CAPCOA List, p. B-10	Parking Area Tree Cover**:** Provide parking lot areas with 50 percent tree cover within 10 years of construction, in particular low emitting, low maintenance, native drought resistant trees. Reduces urban heat island effect and requirement for air conditioning, effective when combined with other measures (e.g., electrical maintenance equipment and reflective paving material).	Yes	The Centennial Specific Plan contains parking lot landscaping guidelines that require minimum 4-foot by –foot area per tree, measured from the inside of the planter area, and minimum one 15-gallon tree is required for 10 parking spaces. (DRP 2017, Appendix 4.0-A, p. 2-66) The Specific Plan also contains parking lot landscape coverage minimums for individual Land Use Designations, which are in addition to general minimum landscape coverage requirements in the commercial/employment designations and Business Park designation (*Id.,* pp. 2-28, 2-32). The Specific Plan also specifies that for Commercial Centers, parking lots should be landscaped to provide shade. (*Id.,* p. 3-32) The Centennial landscape concepts utilize a plant palette that is tailored to the unique high desert environmental conditions. This plant palette borrows extensively from the existing landscape, allowing for both native and adapted species of pine, oak, willow, cottonwood, and grasses. Species selected for planting should be adapted to the conditions found on the Project site, and they must be able to survive hot, dry summers and windy conditions without high irrigation demands. (*Id.,* Appendix 4.0-A, p. 3-42) Per the Los Angeles County Green Building Standards Code, the County's drought-tolerant landscaping requirements establish minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. (*Id.,* p. 5.21-36) The Project is subject to the Los Angeles County Tree Planting Ordinance, which includes requirements for new development projects to plant new trees in parking lots larger than 15 spaces, including a requirement to demonstrate at least 50 percent coverage within 15 years of construction. (See Los Angeles County Department of Regional Planning Tree Planting Guide, available at: http://planning.lacounty.gov/assets/upl/project/tpo_guide.pdf.)

TABLE 8: AGRICULTURE, FORESTRY, AND URBAN FORESTRY

Row	Source	Measure	Included	Response
338	BAAQMD List, p. 4-14	Plant shade trees within 40 feet of the south side or within 60 feet of the west sides of properties.	Yes – Functional Equivalent Required	Per the Centennial Specific Plan, the Project will use trees, landscaping and sunscreens to west and south exterior building walls to reduce energy use where feasible and consistent with building and site purpose, and consistent with other applicable requirements such as encouraging higher density and restricted plant palette. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18)
339	2008 OPR List p. 18	<u>Landscaping/Urban Forestry</u> 1) Plant trees and vegetation near structures to shade buildings and reduce energy requirements for heating/cooling. 2) Preserve or replace onsite trees (that are removed due to development) as a means of providing carbon storage.	Yes	1. Per the Centennial Specific Plan, the Project will use trees, landscaping and sunscreens to west and south exterior building walls to reduce energy use where feasible and consistent with building and site purpose, and consistent with other applicable requirements such as encouraging higher density and restricted plant palette. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 18) Per the Centennial Green Development Program, the Project will incorporate passive solar design to reduce heat loads from glazing by strategically locating shade trees, trellises, awnings, exterior blinds, or shutters, to provide shading, and will increase air flow and reduce heat sinks at building entrances by, for example, including vegetation, water ponds, or fountains outside inlet openings to pre-cool air flow into buildings. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20) 2. The Project is subject to the Los Angeles County Tree Planting Ordinance, which includes requirements for new development projects to plant new trees at a rate of 1 tree for every 5,000 square feet of building footprint per lot for primarily residential projects with more than 4 units, and 3 trees for every 10,000 square feet of developed lot area for non-residential and mixed use. (*Id.,* pp. 5.21-36, 5.21-37) Trees planted must (1) provide adequate shade; (2) be resistant to local pests and diseases; (3) be non-invasive species; and (4) be appropriate for the planting location, pursuant to Section 22.56.2100 of the ordinance. (*Id.,* p. 5.21-37) The planting of an estimated 35,123 new trees, as required by the County Tree Planting Ordinance would result in an estimated long-term sequestration of 24,867 metric tons of carbon dioxide equivalent (MTCO2e). This is a conservative analysis, as it is likely that many more trees would be planted than the minimum required by the County ordinance. (*Id.,* p. 5.21-83)

TABLE 8: AGRICULTURE, FORESTRY, AND URBAN FORESTRY

Row	Source	Measure	Included	Response
340	Ag List, p. 7	Create water-efficient landscapes.	Yes	Per the Centennial Specific Plan, to be water conscious, the Centennial landscape concepts utilize a plant palette that is tailored to the unique high desert environmental conditions. This plant palette borrows extensively from the existing landscape, allowing for both native and adapted species of pine, oak, willow, cottonwood, and grasses. Species selected for planting should be adapted to the conditions found on the Project site, and they must be able to survive hot, dry summers and windy conditions without high irrigation demands. (DRP 2017, Appendix 4.0-A, p. 3-42) Per the Los Angeles County Green Building Standards Code, the County's drought-tolerant landscaping requirements establish minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. (*Id.,* p. 5.21-36) These requirements include the following: (1) a minimum of 75 percent of total landscaped area must utilize non-invasive drought-tolerant plant and tree species appropriate for the climate zone region; (2) a maximum of 25 percent of landscaped areas may be turf grass; and (3) hydro-zoning irrigation techniques shall be incorporated into the landscape design. (*Ibid*.) Compliance with these requirements has been incorporated into the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 10)
341	SLOAPCD List, p. 3-18	Plant drought tolerant, native shade trees along southern exposures of buildings to reduce energy used to cool buildings in summer.	Yes	Per the Centennial Specific Plan, to be water conscious, the Centennial landscape concepts utilize a plant palette that is tailored to the unique high desert environmental conditions. This plant palette borrows extensively from the existing landscape, allowing for both native and adapted species of pine, oak, willow, cottonwood, and grasses. Species selected for planting should be adapted to the conditions found on the Project site, and they must be able to survive hot, dry summers and windy conditions without high irrigation demands. (DRP 2017, Appendix 4.0-A, p. 3-42) Per the Los Angeles County Green Building Standards Code, the County's drought-tolerant landscaping requirements establish minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. (*Id.,* p. 5.21-36) These

TABLE 8: AGRICULTURE, FORESTRY, AND URBAN FORESTRY

Row	Source	Measure	Included	Response
				requirements include the following: (1) a minimum of 75 percent of total landscaped area must utilize non-invasive drought-tolerant plant and tree species appropriate for the climate zone region; (2) a maximum of 25 percent of landscaped areas may be turf grass; and (3) hydro-zoning irrigation techniques shall be incorporated into the landscape design. (*Ibid*.) Compliance with these requirements has been incorporated into the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 10) Per the Centennial Specific Plan, the Project will use trees, landscaping and sunscreens to west and south exterior building walls to reduce energy use where feasible and consistent with building and site purpose, and consistent with other applicable requirements such as encouraging higher density and restricted plant palette. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 18)
342	SMAQMD List, p. 12	Water efficient landscape. Plant native or drought-resistant trees and vegetation.	Yes	Per the Centennial Specific Plan, to be water conscious, the Centennial landscape concepts utilize a plant palette that is tailored to the unique high desert environmental conditions. This plant palette borrows extensively from the existing landscape, allowing for both native and adapted species of pine, oak, willow, cottonwood, and grasses. Species selected for planting should be adapted to the conditions found on the Project site, and they must be able to survive hot, dry summers and windy conditions without high irrigation demands. (DRP 2017, Appendix 4.0-A, p. 3-42) Per the Los Angeles County Green Building Standards Code, the County's drought-tolerant landscaping requirements establish minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. (*Id.,* p. 5.21-36) These requirements include the following: (1) a minimum of 75 percent of total landscaped area must utilize non-invasive drought-tolerant plant and tree species appropriate for the climate zone region; (2) a maximum of 25 percent of landscaped areas may be turf grass; and (3) hydro-zoning irrigation techniques shall be incorporated into the landscape design. (*Ibid*.) Compliance with these requirements has been

TABLE 8: AGRICULTURE, FORESTRY, AND URBAN FORESTRY

Row	Source	Measure	Included	Response
				incorporated into the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 10) The Project also makes extensive use of reclaimed water for irrigation, as discussed in rows 326 through 328.
343	SLOAPCD List, p. 3-19	Eliminate high water consumption landscape (e.g., plants and lawns) in residential design. Use native plants that do not require watering and are low ROG emitting.	Yes	Per the Centennial Specific Plan, to be water conscious, the Centennial landscape concepts utilize a plant palette that is tailored to the unique high desert environmental conditions. This plant palette borrows extensively from the existing landscape, allowing for both native and adapted species of pine, oak, willow, cottonwood, and grasses. Species selected for planting should be adapted to the conditions found on the Project site, and they must be able to survive hot, dry summers and windy conditions without high irrigation demands. (DRP 2017, Appendix 4.0-A, p. 3-42) Per the Los Angeles County Green Building Standards Code, the County's drought-tolerant landscaping requirements establish minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. (*Id.,* p. 5.21-36) These requirements include the following: (1) a minimum of 75 percent of total landscaped area must utilize non-invasive drought-tolerant plant and tree species appropriate for the climate zone region; (2) a maximum of 25 percent of landscaped areas may be turf grass; and (3) hydro-zoning irrigation techniques shall be incorporated into the landscape design. (*Ibid*.) Compliance with these requirements has been incorporated into the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 10)

TABLE 8: AGRICULTURE, FORESTRY, AND URBAN FORESTRY

Row	Source	Measure	Included	Response
344	CAPCOA List, pp. B-20, B-21	Landscaping. Project shall use drought resistant native trees, trees with low emissions and high carbon sequestration potential. Evergreen trees on the north and west sides afford the best protection from the setting summer sun and cold winter winds. Additional considerations include the use of deciduous trees on the south side of the house that will admit summer sun; evergreen plantings on the north side will slow cold winter winds; constructing a natural planted channel to funnel summer cooling breezes into the house. Neighborhood CCR's not requiring that front and side yards of single family homes be planted with turf grass. Vegetable gardens, bunch grass, and low-water landscaping shall also be permitted, or even encouraged.	Yes	Per the Centennial Specific Plan, to be water conscious, the Centennial landscape concepts utilize a plant palette that is tailored to the unique high desert environmental conditions. This plant palette borrows extensively from the existing landscape, allowing for both native and adapted species of pine, oak, willow, cottonwood, and grasses. Species selected for planting should be adapted to the conditions found on the Project site, and they must be able to survive hot, dry summers and windy conditions without high irrigation demands. (DRP 2017, Appendix 4.0-A, p. 3-42) Per the Los Angeles County Green Building Standards Code, the County's drought-tolerant landscaping requirements establish minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. (*Id.,* p. 5.21-36) These requirements include the following: (1) a minimum of 75 percent of total landscaped area must utilize non-invasive drought-tolerant plant and tree species appropriate for the climate zone region; (2) a maximum of 25 percent of landscaped areas may be turf grass; and (3) hydro-zoning irrigation techniques shall be incorporated into the landscape design. (*Ibid*.) Compliance with these requirements has been incorporated into the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 10) Per the Centennial Green Development Program, the Project must provide that landscaped areas of single-family detached residential front yards and multi-family residential common areas contain no more than 25 percent turf grass and that landscaped commercial areas may include turf only if irrigated with recycled water. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 27) Per PDF 5-1, the Project would also accommodate 50 acres of small-scale agriculture and related uses, including, but not limited to community gardens, farmers markets/produce stands, growing and sales of nursery stocks, and commercial greenhouses. (*Id.,* p. 5.5-12)

TABLE 9: MEASURES NOT RELEVANT TO THE PROPOSED PROJECT OR TO ANY PERMITTED PROJECT USE

Row	Source	Measure	Included	Response
345	BAAQMD List p. 4-15	Retrofit existing buildings to meet CA GBC standards	N/A	The proposed Project involves new construction, rather than modifications to existing buildings. This measure is therefore inapplicable.
346	2008 OPR List, p. 19	Retrofit municipal water and wastewater systems with energy efficient motors, pumps and other equipment, and recover wastewater treatment methane for energy production.	N/A	The proposed Project involves new construction, rather than modifications to existing buildings. This measure is therefore inapplicable.
347	2008 OPR List, p. 19	Execute an Energy Savings Performance Contract with a private entity to retrofit public buildings. This type of contract allows the private entity to fund all energy improvements in exchange for a share of the energy savings over a period of time.	N/A	The proposed Project involves new construction, rather than modifications to existing buildings. This measure is therefore inapplicable.
348	CAPCOA List, p. B-30	Retro-Commissioning**.** The process ensures that all building systems perform interactively according to the contract documents, the design intent and the owner's operational needs to optimize energy performance.	N/A	The proposed Project involves new construction, rather than modifications to existing buildings. This measure is therefore inapplicable.
349	2008 OPR List, p. 19	Convert landfill gas into energy sources for use in fueling vehicles, operating equipment, and heating buildings.	N/A	There will not be a landfill on the project site, nor does the proponent have any control over or access to landfill gas. (DRP 2017, p. 5.21-75)
350	2008 OPR List, p. 19	Offer rebates and low-interest loans to residents that make energy-saving improvements on their homes.	N/A	This mitigation measure is intended to be applicable to appliance and energy system makers, and lenders, and the Project proponent is neither.

TABLE 9: MEASURES NOT RELEVANT TO THE PROPOSED PROJECT OR TO ANY PERMITTED PROJECT USE

Row	Source	Measure	Included	Response
351	2008 OPR List, p. 19	Offer government incentives to private businesses for developing buildings with energy and water efficient features and recycled materials. The incentives can include expedited plan checks and reduced permit fees.	N/A	This measure is intended to be applicable to government agencies, rather than to private development, and the project proponent is not a government agency.
352	2008 OPR List, p. 20	Offer government employees financial incentives to carpool, use public transportation, or use other modes of travel for daily commutes.	N/A	This measure is intended to be applicable to government agencies, rather than to private development, and the project proponent is not a government agency.
353	2008 OPR List, p. 19	Purchase Energy Star equipment and appliances for public agency use.	N/A	This measure is intended to be applicable to government agencies, rather than to private development, and the project proponent is not a government agency.
354	CAPCOA List, p. B-31	School Curriculum**.** Include how to reduce GHG emissions (e.g., energy saving, food miles) in the school curriculum.	N/A	This measure is intended to be applicable to government agencies, rather than to private development, and the project proponent is not a government agency.
355	2008 OPR List, p. 19	Purchase government vehicles and buses that use alternatives fuels or technology, such as electric hybrids, biodiesel, and ethanol. Where feasible, require fleet vehicles to be low emission vehicles. Promote the use of these vehicles in the general community.	N/A	This measure is intended to be applicable to government agencies, rather than to private development, and the project proponent is not a government agency.
356	AG List, p. 17	The list suggests that "If, after analyzing and requiring all reasonable and feasible on-site mitigation measures for avoiding or reducing greenhouse gas-related impacts, the lead agency determines that additional mitigation is required, the agency may consider additional off-site mitigation. The project proponent could, for example, fund	N/A	Additional GHG mitigation has been determined not to be required for this project. Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA.

TABLE 9: MEASURES NOT RELEVANT TO THE PROPOSED PROJECT OR TO ANY PERMITTED PROJECT USE

Row	Source	Measure	Included	Response
		off-site mitigation projects that will reduce carbon emissions, conduct an audit of its other existing operations and agree to retrofit, or purchase verifiable carbon "credits" from another entity that will undertake mitigation."		
357	SLOAPCD List, pp. 3-20 to 3-21	The list suggests that "Operational phase emissions from large development projects that cannot be adequately mitigated with on-site mitigation measures alone will require off-site mitigation in order to reduce air quality impacts to a level of insignificance if emissions cannot be adequately mitigated with on-site mitigation measures alone." The list provides suggested off-site mitigation strategies on p. 3-21.	N/A	Additional GHG mitigation has been determined not to be required for this project. Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion.
358	CAPCOA List, p. B-33	Off-Site Mitigation Fee Program**.** Provide/Pay into an off-site mitigation fee program, which focuses primarily on reducing emissions from existing development and buildings through retro-fit (e.g., increased insulation).	N/A	Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although cumulative GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion.
359	CAPCOA List, p. B-33	Offset Purchase**.** Provide/purchase offsets for additional emissions by acquiring carbon credits or engaging in other market "cap and trade" systems.	N/A	Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although cumulative GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion.

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
Construction				
360	2017 OPR List, p. 343	Enforce idling time limits for construction vehicles	Yes	Project MMs 11-2 and 21-4 require the limitation of construction equipment idling time to 3 minutes. (DRP 2017, pp. 5.11-79, 5.21-89) As noted in the AG List, under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds must also already comply with a prohibition from idling for more than 5 minutes at any location. (AG List, p. 16)
361	CARB List, p. 7	Enforce idling time restrictions for construction vehicles.	Yes	Project MMs 11-2 and 21-4 incorporate this requirement, as discussed further in row 360.
362	2017 OPR List, p. 343	Require construction vehicles to meet latest engine standards.	Yes	Per MM 11-2 (as revised in this Final EIR), the Project requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, and any emissions-control device used by a contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If tier 4 Final equipment is not available, the Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach – these policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). (DRP 2017, pp. 5.11-78, -79)

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
363	CARB List, p. 7	Require construction vehicles to operate with the highest tier engines commercially available.	Yes	This requirement is incorporated into MM 11-2, as discussed further in row 362.
364	2017 OPR List, p. 343	Divert and recycle demolition waste, and use locally-sourced building and recycled content materials to the extent possible.	Yes	With regard to construction waste, the Master Developer shall provide the County with a plan and monitoring program that commits to diverting from landfill disposal 100 percent of soil during grading activities, and at least 75 percent of nonhazardous construction and demolition waste, which exceeds the 65 percent diversion requirement with the Tier 1 voluntary measure in Section A5.408.3.1 of the 2016 California Green Building Standards (CALGreen) Code. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 25) This goal also exceeds the 50 percent reduction required by Section 20.87.040 of the County Code and Sections 4.408.5/5.408.1.4 of the CALGreen Code.
365	CARB List, p. 7	Divert and recycle construction and demolition waste, and use locally-sourced building materials with a high recycled material content to the greatest extent feasible.	Yes	With regard to the diversion of waste, this requirement has been incorporated in to the Project, as discussed in row 364. With regard to building material selection, see new MM 21-21 set forth in row 59.
366	2017 OPR List, p. 343	Minimize tree removal, and mitigate indirect GHG impacts from vegetation removal.	Yes	The Project preserves large swaths of natural landscape and biological resource areas. Approximately 5,787 acres (approximately 45.9 percent) of the 12,323-acre Project site are proposed for Open Space for natural resource protection and greenways, and parks for active and passive recreational use. (DRP 2017, p. 4-6) The Project is subject to the Los Angeles County Tree Planting Ordinance, which includes requirements for new development projects to plant new trees at a rate of 1 tree for every 5,000 square feet of building footprint per lot for primarily residential projects with more than 4 units, and 3 trees for every 10,000 square feet of developed lot area for non-residential and mixed use. (*Id.,* pp. 5.21-36, 5.21-37) Trees planted must (1) provide adequate shade; (2) be resistant to local pests and diseases; (3) be non-invasive species; and (4) be appropriate for the planting location, pursuant to Section 22.56.2100 of the ordinance. (*Id.,* p. 5.21-37) Per the Centennial Green Development Program, the Project will reduce

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				heat loads from glazing by strategically locating shade trees. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20) The planting of an estimated 35,123 new trees, as required by the County Tree Planting Ordinance would result in an estimated long-term sequestration of 24,867 metric tons of carbon dioxide equivalent (MTCO2e). This is a conservative analysis, as it is likely that many more trees would be planted than the minimum required by the County ordinance. (*Id.,* p. 5.21-83)
367	CARB List, p. 7	Minimize tree removal, and mitigate indirect GHG emissions increases that occur due to vegetation removal, loss of sequestration, and soil disturbance.	Yes	This requirement is met, see row 366.
368	2017 OPR List, p. 343	Utilize existing on-site power poles rather than temporary gasoline/diesel power generators.	Yes – Functional Equivalent Required.	Per Draft EIR Table 5.21-3, initial Project construction activities are anticipated to require the use of temporary generators. (DRP 2017, p. 5.21-51) While there are SCE electric lines running north-south to the Oso Pumping Plant and National Cement Plant and east-west along SR-138 as well as the Bailey Substation located on an SCE-owned parcel in the southwestern portion of the Project site, these existing electric lines do not currently provide power to the Project site and would require extensions and upgrades. Project construction activities will use available electric power, including expanded electric power from newly-constructed Project-related powerlines and substations.
369	CARB List, p. 7	Utilize existing grid power for electric energy rather than operating temporary gasoline/diesel powered generators	Yes – Functional Equivalent Required.	This requirement is met; see row 368 for further discussion.
370	2017 OPR List, p. 343	Increase use of electric and renewable fuel construction equipment.	Yes – Functional Equivalent Required	Per MM 11-2 (as revised in this Final EIR), the Project requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet U.S. Environmental Protection Agency Tier 4 Final emission standards to the extent that the equipment is available. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, and any emissions-control device used by a contractor shall achieve
371	CARB List, p. 7	Increase use of electric and renewable fuel powered construction equipment and	Yes – Functional Equivalent Required	

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
		require renewable diesel fuel where commercially available		emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. If tier 4 Final equipment is not available, the Applicant/Developer shall provide the County with documentation showing the reasons for non-availability. Alternatively, construction equipment may be selected according to the Green Construction Policy used by the Los Angeles County Metropolitan Transportation Authority or the ports of Los Angeles/Long Beach – these policies include provisions to 'step down' from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB) or the U.S. Environmental Protection Agency (USEPA). (DRP 2017, pp. 5.11-78, -79) MM 11-2 also requires the use of 2010 or newer diesel haul trucks. (*Id.,* p. 5.11-79)
372	2017 OPR List, p. 343	Require diesel equipment fleets to exceed any current emission standard.	Yes – Functional Equivalent Required	Project diesel equipment fleets will both be required to meet EPA Tier 4 Final emission standards to the extent that the equipment is available, and will additionally be required to be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, as further discussed in row 371.
373	CARB List, p. 7	Require diesel equipment fleets to be lower emitting than any current emissions standard	Yes – Functional Equivalent Required	Project diesel equipment fleets will both be required to meet EPA Tier 4 Final emission standards to the extent that the equipment is available, and will additionally be required to be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, as further discussed in row 371.
374	2017 OPR List, p. 343	Require best available control technology for all construction equipment.	Yes	Project diesel equipment fleets will both be required to meet EPA Tier 4 Final emission standards to the extent that the equipment is available, and will additionally be required to be outfitted with Best Available Control Technology devices certified by CARB or the USEPA, as further discussed in row 371.

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
Operation				
375	2017 OPR List, p. 343	Achieve a zero net emissions goal for all new development.	Not feasible within the Project boundaries based on Project activities that fall within jurisdiction and control of Applicant and Lead Agency.	While the Project has been designed to and will have much lower per capita and per residential unit GHG emissions in relation to existing average per capita and per residential unit GHG emissions, the majority of Project GHG emissions occur from vehicular emissions that fall solely within the jurisdiction and control of federal and state agencies (e.g., in regulating the types and fuel efficiencies of vehicles), and in generating electricity within the grid serving the Project region including the Project site. Vehicular GHG emission reductions, for example, are achieved under the state's stringent GHG laws[2208] from a combination of existing legal mandates, including but not limited to the Cap and Trade program covering all fossil fuel related emissions from "wells to wheels," mandatory increases in non-fossil fuel vehicles, and compliance with regional land use and transportation strategies to reduce GHG from land use and transportation patterns.[2209] Similarly, electricity generation from renewable resources such as solar and wind power, is mandated under state laws,[2210] and is also subject to evolving and improving technologies (e.g., storage) and governance frameworks (e.g., multi-state grid integration). Achieving a "net zero" greenhouse gas reduction outcome within the Project boundaries for transportation, electric generation, and other offsite sources that are outside the jurisdiction and control of Los Angeles County is infeasible. Other development applicants have proposed "net zero" greenhouse gas projects which require payments of fees or costs for offsite GHG reductions; however, imposing such external costs on a Project increases Project costs and reduce the affordability of Project housing.[2211,2212,2213] Extraordinarily high existing housing costs have already caused California to have the highest poverty rate in the nation

[2208] S.B. 32, 2015–2016 Reg. Sess. (Cal. 2016); Assemb. B. 32, 2005–2006 Reg. Sess. (Cal. 2006).
[2209] OPR. Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (Jan. 20, 2016), https://perma.cc/8EWJ-MV3Y.
[2210] CCR, Title 24, Part 11
[2211] California Energy Commission, Zero Net Energy Strategy Presentation (8/22/17).
[2212] Governor's Office of Planning and Research, Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (Jan. 20, 2016).
[2213] CARB. 2017 Climate Change Scoping Plan Update, at 113 (Jan. 20, 2017), p. 39, 151-152

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				according to the US Census,[2214] which in turn has already led to a substantial net out-migration of California's working families to much higher per-capita GHG states such as Texas, Nevada and Arizona.[2215] Increasing Project housing costs and reducing Project affordability will further exacerbate the California housing crisis and encourage more outmigration to higher per capita GHG states. Although greenhouse gas is a global pollutant for which reductions can be achieved in other countries and continents, mandating and monitoring such offsite reductions is outside the jurisdiction and control of the lead agency for CEQA purposes. Also, please see response to Comment F.8-87; all feasible mitigation measures to reduce the Project's GHG emissions impacts have been required and are described in Draft EIR Section 5.21, Climate Change. It has been California policy that all new residential buildings will be zero net energy (ZNE) by 2020 and new commercial buildings will be ZNE by 2030, as described in the 2008 California Public Utilities Commission (CPUC) long-term energy efficiency strategic plan. In 2013, the California Energy Commission (CEC), in coordination with the CPUC, commenced a process to update the California Building Energy Efficiency Standards (Title 24) and, in 2016, the CEC updated the Title 24 Building Energy Efficiency Standards to establish building design and construction requirements that move closer to achieving California's ZNE goals, with the next update scheduled for 2019. As part of 2019 Building Energy Efficiency Standards rulemaking process, CEC staff has currently determined that ZNE cannot be achieved by 2020 within the confines of existing net energy metering and life cycle costing rules.[2216, 2217] CEC staff has also determined that the State's ZNE goals cannot be achieved until California develops and implements electric grid harmonization

[2214] Dan Walters, Why does California have the nation's highest poverty level?, CALMATTERS (Aug. 13, 2017), https://perma.cc/GMM9-QWUA.

[2215] Drew Lynch, Californians Consider moving to rising housing costs, poll finds, CAL WATCHDOG (Sept. 21, 2017).

[2216] California Energy Commission, 2019 Building Energy Efficiency Standards PreRulemaking Presentation - Proposed 2019 Building Energy Efficiency Standards ZNE Strategy (Aug. 24, 2017), http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-01/TN220876_20170824T105443_82217_ZNE_Strategy_Presentation.pdf.

[2217] Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				strategies that maximize self-utilization of photovoltaic array output and minimize renewable energy exports back to the grid, such as commercially viable battery storage, demand response, thermal storage technologies.[2218,2219] California has, however, continued to make substantial progress toward achieving its ZNE policy, including most recently the CEC's decision to require solar panels on rooftops of most types of new residential buildings.[2220] These and additional future building code standards updates, which must also take into account all applicable statutory building code standards mandates, such as consumer cost effectiveness, are expected to continue the State's trajectory toward achieving its ZNE policy. Moreover, MMs 21-2 and 21-3 obligate the Project to comply with CALGreen voluntary measure A5.203.1.2.1, which requires newly constructed low-rise residential buildings to exceed the 2016 Title 24 energy efficiency requirements by 15 percent, and newly constructed nonresidential buildings to exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (DRP 2017, pp. 5.21-88, -89)
376	2017 OPR List, p. 343	Develop an offsite retrofit program to support the conversion of existing housing stock to be more efficient at resource consumption.	Not feasible within the Project boundaries based on Project activities that fall within jurisdiction and control of Applicant and Lead Agency.	Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion. Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although cumulative GHG emissions remain significant and unavoidable, further reductions of GHG by the project

[2218] *Ibid*.

[2219] Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

[2220] California Energy Commission Initial Statement of Reasons for Proposed Building Standards of the California Energy Commission Regarding Code of Regulations, Title 24, Part 1, Chapter 10 and Part 6 (2010 California Energy Code) Docket Number 17-BSTD-02

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				are not required by CEQA. See response to Comment F.8-96 for further discussion.
377	2017 OPR List, p. 344; CARB List, p. 7	Comply with lead agency's standards for mitigation transportation impacts under SB 743.	Yes	SB 743 did not mandate which metric or methodology OPR should propose to use instead of LOS in or outside TPAs. The OPR discussion drafts proposed to replace CEQA's current LOS significance thresholds with two new thresholds based on VMT and traffic inducement (i.e., the construction of any new capacity on existing highways or major roadways). The OPR proposal remains extremely controversial, especially outside major cities already served by transit, and with the goods movement industry and related manufacturing and agricultural producers in California who rely on adequate roadway capacity. The OPR proposal has not proceeded to the next administrative step required by SB 743, which is the commencement of formal rulemaking with a proposed new amendment to the CEQA Guidelines. At present, no state agency mandate exists to ignore CEQA's current LOS threshold of significance or to impose a new or alternative threshold of significance, including the VMT thresholds that have been discussed by the OPR. Notably, the NW 138 FEIR, which was issued by Caltrans in June 2017, evaluates impacts on the basis of the LOS thresholds in the existing CEQA Guidelines. It should also be noted that local agencies may adopt their own thresholds of significance, provided these lead agency thresholds are supported by substantial evidence in the record. Los Angeles County has not adopted changes to the existing LOS-based CEQA significance thresholds. Consequently, the Draft EIR and the STS properly utilize the LOS thresholds in the CEQA Guidelines.
378	2017 OPR List, p. 344	Require on-site EV charging capabilities for parking spaces serving the project.	Yes	The Project provides extensive electric vehicle charging infrastructure throughout the Project site. Per MM 21-15 (as updated in response to Comment F.8-95), the Project will provide one 208/240 VAC receptacle for charging electric vehicles in each detached and attached single-family residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A4.106.4.1. (DRP 2017, p. 5.21-91)

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				Per MM 21-16 (as updated in response to Comment F.8-95), "alternative energy fueling stations" shall be installed as follows, and each provide for the charging of two electric vehicles: • Business Park and Institutional land use designations shall provide a minimum of one alternative energy vehicle fueling station on site for the first 50,000 square feet of usable floor space and additional alternative energy vehicle fueling stations for each additional 50,000 square feet of usable floor space thereafter. • Multi-family residential buildings of at least 17 residential units shall provide a minimum of one alternative energy vehicle fueling station for the first 17 residential units and an additional alternative energy vehicle fueling station for each additional 17 residential units thereafter. • The Town Center and each Village Center shall provide a minimum of one alternative energy vehicle charging station. • Designated Transit Hubs shall provide a minimum of one alternative energy vehicle charging station. (*Id.,* p. 5.21-91) See also MM 11-4, as updated by response to Comment F.8-95, regarding the installation of Electric Vehicle Supply Equipment as defined by CALGreen Code Section 202, in nonresidential buildings. See also the Centennial Green Development Program specifications regarding electric vehicle infrastructure. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 14) See below under *Transportation Demand Management* with regard to car-sharing.
379	CARB List, p. 7	Require on-site EV charging capabilities for parking spaces serving the project to meet jurisdiction-wide EV proliferation goals.	Yes	The Project provides extensive electric vehicle charging infrastructure throughout the Project site, as described further in row 378.
380	2017 OPR List, p. 344	Provide fewer on-site parking spaces than required by code if appropriate	Yes	Per the Green Development Program, the Project will provide a framework for a community-wide parking plan that is based on parking demand and need. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 14) Parking requirements for the Project shall be in accordance with Par

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				11, Vehicle Parking Spaces, Sections 22.52.1000-1210 of Title 22, Zoning Ordinance, except as specified in the Centennial Specific Plan. (*Id.,* Appendix 4.0-A, p. 2-65) As specified in the Specific Plan, shared parking to reduce the total amount of required parking may be allowed for Joint-Use Mixed-Use projects, or where a shared parking proposal is appropriate. (*Ibid*.) The Centennial Specific Plan also sets out clustered/shared parking facility metrics to meet parking needs while enhancing the walkability and character of Village Core and Town Centers by avoiding multiple, single use parking lots or multiple, small shared parking lots. (*Id.,* Appendix 4.0-A, p. 2-66) The metrics include the following: 1. In the Village Cores, up to two shared parking facilities (i.e. a lot or structure designed according to assigned uses at the time of construction of the facility, based on parking "maximums" established in the Specific Plan) shall be used to meet the onsite parking needs of all non-residential uses located in each of the Village Cores. (*Ibid*.) 2. In the Town Center, up to three shared facilities shall be used to meet the onsite parking needs of all non-residential uses located in the Town Center. (*Ibid*.) 3. In the BP/IC designated areas of the CCD, the number of shared parking facilities needed to meet the onsite parking requirements of all uses located in each of these areas shall be determined by a parking demand study at the time of tentative tract map submittal. (*Ibid*.) 4. Any additional parking for Town Center/CCD uses shall be met by on-street parking. If on-street parking cannot satisfy all parking demands, a discretionary permit may be filed for extra parking. (*Ibid*.) 5. Shared and on-street parking should be utilized for residential uses located in the Village Cores and Town Center, and Shared and on-street parking used to meet onsite parking needs shall be allowed

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				"by-right" (i.e. without a discretionary permit) for any use located in the centers/CCD. (*Ibid*.) Each shared parking facility located within a Village Core, Town Center, and CCD shall be fully contained within one development block. Parking structures shall be located behind or beneath buildings and may be wrapped with development on the street frontage or alternatively, shall have commercial or civic uses on the ground floor where portions of the structure front along streets. (*Ibid*.)
381	CARB List, p. 8	Allow for new construction to install fewer on-site parking spaces than required by local municipal building code, if appropriate.	Yes	The Centennial Specific Plan allows for this, as discussed further in row 380.
382	2017 OPR List, p. 344; CARB List, p. 8	Dedicate on-site parking for shared vehicles.	Yes	Per MM 21-17, preferential parking for low-emitting, fuel-efficient, and carpool/vanpool vehicles shall be provided as specified in Section A5.106.5.1, Nonresidential Voluntary Measures, of the CALGreen Code. (DRP 2017, pp. 5.21-91, -92) Per MM 11-4 (as updated in response to Comment F.8-95), it shall be as follows: two for 10 to ~~15~~ 25 spaces; four for 26 to 50 spaces; six for 51 to 75 spaces; nine for 76 to 100 spaces; eleven for 101 to 150 spaces; 18 for 151 to 200 spaces; and at least 10 percent of total for 201 and more spaces. (DRP 2017, p. 5.11-79) Relevant TMA activities include implementing car-sharing programs, and such measures are included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 13) Measure language is as follows: **Implement Car-Sharing Program (e.g. Zipcar, Car2Go)** – either residential-based or employer-based programs that allow people to have on-demand access to shared vehicles, with costs determined through mileage or hourly rates with deposits or annual membership fees. Both residential and employer-based programs encourage carpooling and therefore reduce traffic volumes. (*Id.,* p. 13)

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
383	2017 OPR List, p. 344; CARB List, p. 8	Provide adequate, safe, convenient, and secure on-site bicycle parking and storage in multi-family residential projects and in non-residential projects.	Yes	Sufficient and appropriate amounts of safe and convenient bicycle parking and end-of-trip facilities are included in the Project, for both residential and nonresidential use, as specified in MMs 11-4, 11-5, 11-6, 21-17, 21-18, and 21-19, and as further discussed in rows 94 through 109, above.
384	2017 OPR List, p. 344; CARB List, p. 8	Provide on- and off-site safety improvements for bike/ped/transit connections and/or implement relevant improvements identified in the applicable bicycle and/or pedestrian master plan.	Yes	A pedestrian- and bicycle-friendly network connects the entire Project site and connects to external areas, as more fully discussed above in rows 81 and 82. The Project also provides extensive bicycle-related infrastructure, as addressed more fully in rows 89-112. See also the discussion regarding complete streets and connectivity in rows 68 through 71 and 76 through 80.
385	2017 OPR List, p. 344; CARB List, p. 8	Require on-site renewable energy generation.	Yes	The Project commits to a minimum of 50 percent renewable energy generation, as provided in MM 21-1, with the following more specific relevant commitments included in the Centennial Green Development Program with regard to solar panels: • A minimum of 30 percent of all single-family detached and attached residential units at buildout shall have solar panel systems installed on roof areas or on top of other structures on the site (for example, patio covers or pergolas). Such systems shall be installed on roof areas facing within 30 degrees of true south. • A minimum of 30 percent of all multi-family residential units at buildout shall have solar panel systems on roof areas. Such systems shall be installed on roof areas facing within 30 degrees of true south. • A minimum of 60 percent of buildings located within Business Park land use designations at buildout shall have solar panel systems installed on roof and parking areas. Such systems shall be installed on roof areas facing within 30 degrees of true south. • All residential buildings will be compatible with solar panel systems giving home buyers the option to include a photovoltaic array system as a home design system.

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				The Project's wastewater reclamation facilities will also include equipment for capture and reuse of biogas for energy production. (DRP 2017, p. 5.21-75)
386	2017 OPR List, p. 344	Prohibit wood-burning fireplaces in new development.	Yes	Per MM 11-3, The Project's plans and specifications shall prohibit wood-burning fireplaces as required by SCAQMD Rule 445 in single-family residences throughout the entire Project site, including at residences that are 3,000 or more feet above mean sea level at which the SCAQMD prohibition would otherwise not apply. Natural gas fireplaces shall be limited to a total of 13,954. (DRP 2017, p. 5.11-79) The Project must also otherwise comply with SCAQMD Rule 445 (Natural Gas Cooking Stoves and Fireplaces).
387	CARB List, p. 8	Prohibit wood-burning fireplaces in new development, and require replacement of wood-burning fireplaces for renovations over a certain size development.	Yes	The Project complies with this requirement, as discussed in row 386. The Project does not involve renovations to existing buildings, so no replacement will be necessary.
388	2017 OPR List, p. 344	Require cool roofs.	Yes	The Project is already legally required to comply with this measure. The Project must comply with requirements of the Los Angeles Green Building Standards Code (Title 31). Title 31 includes measures requiring cool roofs. California's Building Energy Efficiency Standards (Title 24) also require cool roofs and has requirements for efficient insulation. Accordingly, the Project's Specific Plan specifies that all Project buildings will come standard with cool roofs. (DRP 2017, Appendix 4.0-A, p. 3-62) Per the Centennial Green Development Program, roofing materials for all buildings shall comply with best management practices currently in place at the time of construction, including cool roof standards, with the exception of roof areas covered by solar panel systems or electricity storage systems. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 19)

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
389	CARB List, p. 8	Require cool roofs and "cool parking" that promotes cool surface treatment for new parking facilities as well as existing surface lots undergoing resurfacing.	Yes	The Project will provide cool roofs, as discussed in row 388. With regard to cool parking, the Project will include installation of cool pavements if approved by Caltrans and the County for roadway uses, provided that road installation and maintenance durability and costs are comparable to existing approved roadway materials (since early replacements or more intensive repair result in higher GHG emissions). (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 19) It would also use light-colored, non-reflective finishes to help reduce glare for outside sidewalks, driveways, patios and parking areas. (*Ibid*.)
390	2017 OPR List, p. 344	Require net energy metering (NEM) ready roofs.	Yes – Functional Equivalent Required	MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature, and the CALGreen Code requires that all residential houses be constructed with "solar ready" roofs, which means they must be constructed in a manner capable of accommodating solar collection systems and being wired to accept such systems. Further, the Specific Plan's Green Development Program requires that all residential buildings be compatible with solar panel systems, and that all commercial and residential structures include passive solar design techniques. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 15) It also requires the installation of onsite solar panel systems on roof areas for a minimum of 30 percent of all single-family detached and attached residential units; a minimum of 30 percent of all multi-family residential units, and a minimum of 60 percent of buildings located within Business Park land use designations. (*Ibid*.)
391	2017 OPR List, p. 344; CARB List, p. 8	Require organic collection in new development.	Yes	The Project implements the residential and nonresidential mandatory measures for material conservation and efficiency that are set forth in Division 4 (residential) and division 5.4 (nonresidential) of the CALGreen Code, including but not limited to: • The CC&Rs will require the Property Owner to recycle and divert from the waste bin, solids such as metal, glass, paper, plastic, cardboard, food, and yard waste; and divert from the waste bin hazardous waste, electronic waste, and universal waste. Information on items prohibited from landfill disposal on

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				recycling and composting will be provided to Property Owners. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 25) • Prior to the issuance of each building permit from commercial properties, including multi-family residences, schools, and places of worship, the Property Owner shall submit to the County a site plan of the property that depicts how solid wastes would be collected and stored for on-site processing, curbside collection, and/or self-hauling. (*Ibid*.) • Prior to sale, lease, or rental of any commercial property, including multi-family residential structures or portions thereof, the Property Owner shall provide to each prospective purchaser or tenant a notice explaining how that property collects and stores recyclables, compostables, universal waste, hazardous waste, and electronic waste for on-site processing, curbside collection, and/or self-hauling. (*Ibid*.) The Project Applicant/Master Developer shall set aside a minimum of 5 acres for a future Materials Recovery Facility/Transfer Station that includes a household, hazardous waste permanent collection and reuse center and allows for mulching/composting operations. (*Ibid*.) The Project also requires the establishment and operation of a community waste recycling program including education and outreach, recycled waste pickup and drop-off services. (*Ibid*.)
392	2017 OPR List, p. 344; CARB List, p. 8	Require low-water landscaping in new development. Require water efficient landscape maintenance to conserve water and reduce landscape waste.	Yes	Per the Centennial Specific Plan, to be water conscious, the Centennial landscape concepts utilize a plant palette that is tailored to the unique high desert environmental conditions. This plant palette borrows extensively from the existing landscape, allowing for both native and adapted species of pine, oak, willow, cottonwood, and grasses. Species selected for planting should be adapted to the conditions found on the Project site, and they must be able to survive hot, dry summers and windy conditions without high irrigation demands. (DRP 2017, Appendix 4.0-A, p. 3-42) Per the Los Angeles County Green Building Standards Code, the County's drought-tolerant landscaping requirements establish

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. (*Id.,* p. 5.21-36) These requirements include the following: (1) a minimum of 75 percent of total landscaped area must utilize non-invasive drought-tolerant plant and tree species appropriate for the climate zone region; (2) a maximum of 25 percent of landscaped areas may be turf grass; and (3) hydro-zoning irrigation techniques shall be incorporated into the landscape design. (*Ibid*.) Compliance with these requirements has been incorporated into the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 10)
393	2017 OPR List, p. 344	Achieve Zero Net Energy performance.	Not feasible within the Project boundaries based on Project activities that fall within jurisdiction and control of Applicant and Lead Agency.	While the Project has been designed to and will have much lower per capita and per residential unit GHG emissions in relation to existing average per capita and per residential unit GHG emissions, the majority of Project GHG emissions occur from vehicular emissions that fall solely within the jurisdiction and control of federal and state agencies (e.g., in regulating the types and fuel efficiencies of vehicles), and in generating electricity within the grid serving the Project region including the Project site. Vehicular GHG emission reductions, for example, are achieved under the state's stringent GHG laws[2221] from a combination of existing legal mandates, including but not limited to the Cap and Trade program covering all fossil fuel related emissions from "wells to wheels," mandatory increases in non-fossil fuel vehicles, and compliance with regional land use and transportation strategies to reduce GHG from land use and transportation patterns.[2222] Similarly, electricity generation from renewable resources such as solar and wind power, is mandated under state laws,[2223] and is also subject to evolving and improving technologies (e.g., storage) and governance frameworks (e.g., multi-state grid integration). Achieving a "net zero" greenhouse gas reduction outcome within the Project boundaries for transportation, electric generation, and other offsite sources that are

[2221] S.B. 32, 2015–2016 Reg. Sess. (Cal. 2016); Assemb. B. 32, 2005–2006 Reg. Sess. (Cal. 2006).
[2222] OPR. Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (Jan. 20, 2016), https://perma.cc/8EWJ-MV3Y.
[2223] CCR, Title 24, Part 11

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				outside the jurisdiction and control of Los Angeles County is infeasible. Other development applicants have proposed "net zero" greenhouse gas projects which require payments of fees or costs for offsite GHG reductions; however, imposing such external costs on a Project increases Project costs and reduce the affordability of Project housing.[2224,2225,2226] Extraordinarily high existing housing costs have already caused California to have the highest poverty rate in the nation according to the US Census,[2227] which in turn has already led to a substantial net out-migration of California's working families to much higher per-capita GHG states such as Texas, Nevada and Arizona.[2228] Increasing Project housing costs and reducing Project affordability will further exacerbate the California housing crisis and encourage more outmigration to higher per capita GHG states. Although greenhouse gas is a global pollutant for which reductions can be achieved in other countries and continents, mandating and monitoring such offsite reductions is outside the jurisdiction and control of the lead agency for CEQA purposes. Also, please see response to Comment F.8-87; all feasible mitigation measures to reduce the Project's GHG emissions impacts have been required and are described in Draft EIR Section 5.21, Climate Change. It has been California policy that all new residential buildings will be zero net energy (ZNE) by 2020 and new commercial buildings will be ZNE by 2030, as described in the 2008 California Public Utilities Commission (CPUC) long-term energy efficiency strategic plan. In 2013, the California Energy Commission (CEC), in coordination with the CPUC, commenced a process to update the California Building Energy Efficiency Standards (Title 24) and, in 2016, the CEC updated the Title 24 Building Energy Efficiency Standards to establish building design and construction requirements that move closer to achieving California's ZNE goals, with the next update scheduled for 2019. As part of 2019 Building Energy Efficiency

2224 California Energy Commission, Zero Net Energy Strategy Presentation (8/22/17).
2225 Governor's Office of Planning and Research, Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (Jan. 20, 2016).
2226 CARB. 2017 Climate Change Scoping Plan Update, at 113 (Jan. 20, 2017), p. 39, 151-152
2227 Dan Walters, Why does California have the nation's highest poverty level?, CALMATTERS (Aug. 13, 2017), https://perma.cc/GMM9-QWUA.
2228 Drew Lynch, Californians Consider moving to rising housing costs, poll finds, CAL WATCHDOG (Sept. 21, 2017).

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				Standards rulemaking process, CEC staff has currently determined that ZNE cannot be achieved by 2020 within the confines of existing net energy metering and life cycle costing rules.[2229, 2230] CEC staff has also determined that the State's ZNE goals cannot be achieved until California develops and implements electric grid harmonization strategies that maximize self-utilization of photovoltaic array output and minimize renewable energy exports back to the grid, such as commercially viable battery storage, demand response, thermal storage technologies.[2231,2232] California has, however, continued to make substantial progress toward achieving its ZNE policy, including most recently the CEC's decision to require solar panels on rooftops of most types of new residential buildings.[2233] These and additional future building code standards updates, which must also take into account all applicable statutory building code standards mandates, such as consumer cost effectiveness, are expected to continue the State's trajectory toward achieving its ZNE policy. Moreover, MMs 21-2 and 21-3 obligate the Project to comply with CALGreen voluntary measure A5.203.1.2.1, which requires newly constructed low-rise residential buildings to exceed the 2016 Title 24 energy efficiency requirements by 15 percent, and newly constructed nonresidential buildings to exceed the 2016 Title 24 energy efficiency requirements by 10 percent. (DRP 2017, pp. 5.21-88, -89)

2229 California Energy Commission, 2019 Building Energy Efficiency Standards PreRulemaking Presentation - Proposed 2019 Building Energy Efficiency Standards ZNE Strategy (Aug. 24, 2017), http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-01/TN220876_20170824T105443_82217_ZNE_Strategy_Presentation.pdf.

2230 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

2231 *Ibid*.

2232 Electric Power Research Institute (Jan. 2017) – Grid Integration of Zero Net Energy Communities, California Energy Commission Docket Number 17 –BSTD-02: http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223207_20180417T082650_Final_Project_Report_Grid_Integration_of_Zero_Net_Energy_Commun.pdf.

2233 California Energy Commission Initial Statement of Reasons for Proposed Building Standards of the California Energy Commission Regarding Code of Regulations, Title 24, Part 1, Chapter 10 and Part 6 (2010 California Energy Code) Docket Number 17-BSTD-02

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
394	CARB List, p. 8	Achieve Zero Net Energy performance targets prior to dates required by CALGreen.	No. Not feasible.	Meeting this requirement prior to dates required by CALGreen would exceed CEQA requirements. Courts have consistently held that single projects cannot be required to bear a greater than proportional share of mitigating a cumulative significant impact (*Dolan v. City of Tigard* (1994) 512 U.S. 374; *Nollan v. Cal. Coastal Comm.* (1987) 483 U.S. 825, 835 n.4; *Ehrlich v. City of Culver City* (1996) 12 Cal. 4th 854). This limitation is also expressly stated in CEQA Guidelines §§15041(a), 15126.4(a)(4). Because GHG emissions from transportation, water and waste management and use, heating and cooling of buildings, and a myriad of other activities are common to all new and modified development projects, and are common attributes of simply residing, working or producing goods or services in California, the feasibility of the mitigation measures required for this project must be commensurate with a fair share allocation and not with a hypothetical "zero net" or "net reduction" threshold or standard. Within this cumulative impact mitigation measure framework, all feasible mitigation measures to reduce the Project's GHG emissions impacts have been required and are described in Draft EIR Section 5.21, Climate Change. Please also see rows 375 and 376.
395	2017 OPR List, p. 344; CARB List, p. 8	Require new construction to achieve third-party green building certification, such as the GreenPoint Rated program and the LEED rating system.	Yes – Functional Equivalent Required	California is a global leader on climate policy and programs and has adopted scores of statutes and regulations to reduce GHG across multiple sectors, which are the equivalent of or would exceed LEED standards. The "green" ranking systems, including LEED, are public and private ranking entities under no obligation to incorporate or address inconsistent applicable California standards, and generally target just a fraction of the multiple sources of GHG emissions associated with land use projects. Further, because the ranking systems, including LEED, are not part of the integrated programs, regulations, and statutes designed to achieve California's GHG reduction target, they do not have any inherent or presumptive superiority to California's legal mandates. These systems also require specialized training and expertise to monitor and certify, can change without notice to affected parties, may not remain timely based on changing technologies and laws, and provide a less stable enforcement framework than compliance with California's legally-required GHG reduction requirements and the

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				carefully crafted Centennial Green Development Program. However, the Centennial Green Development Program does require the delivery of a third-party verification by a qualified inspector to the Department of Public Works that demonstrates that the Centennial Green Development Program has been implemented. The qualified inspector could be a LEED accredited professional. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 8) It is also noted that many of the LEED design principles are consistent with Project design and principles. For example, the Project meets LEED design criteria including walkable streets, a connected and open community, mixed-use neighborhoods, a mix of housing types, transportation demand management, access to public space and recreation facilities, and visitability and universal design. (See U.S. Green Building Council, LEED credit library, available online at: www.usgbc.org/credits).
396	2017 OPR List, page 344; CARB List, p. 8	Require the design of bikes lanes to connect the regional bicycle network.	Yes	Project buildout would result in the provision of a network of bike paths, lanes, and routes connecting all Project uses, and two underpasses and one overpass bridge crossing will be constructed across the SR-138 to facilitate bicycle access to employment centers. (DRP 2017, pp. 4-35 to 4-36, Exhibit 4-8). As discussed in Specific Plan Section 3.2.4, *Bikeways*, a system of bikeways will serve the entire Project community. (*Id.,* Appendix 4.0-A, p. 3-6) The bikeways are part of the community trail system and are classified into four categories which are described below and shown on Specific Plan Figure 3-3, *Bicycle Network*. (*Ibid*.) **Bike Path (Class I Multi-use trail).** Class I multi-use trail bikeways provide a completely separated travel way for the exclusive use of bicyclists and pedestrians, with crossflow minimized. These bikeways are generally located in community trails and greenways. (*Ibid*.) **Bike Lane (Class II bikeway).** Class II bikeways include a striped lane for one-way bike travel on a street or highway. When roadways contain additional rights-of-way, a painted buffer may be included to buffer

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				bicyclists from automobiles and transit. This buffered design is commonly referred to as an Enhanced Class II Bikeway. (*Ibid*.) **Bike Route (Class III bikeway).** Class II bikeways provide for shared use with motor vehicle traffic, and routes are marked with appropriate signage. Painted shared lane markings on pavement, commonly referred to as sharrows, may also be incorporated into Class III bikeways, further identifying shared use between motorists and bicyclists. (*Ibid*.) **Protected Bike Lane (Class IV bikeway).** A protected bikeway, commonly referred to as a cycle track, combines the user experience of a separated path with the on-street infrastructure of a conventional bike lane. Cycle tracks vary in configuration. Cyclists could be separated from motor vehicle traffic through such means as raised medians, on-street parking, bollards, or elevated pathways. They may be one-way (one direction on each side of the street) or two-way (both directions side-by-side on one side of the street). The buffers shown for Class IV bikeways in Specific Plan Figures 3-6, 3-7, and 3-11 may be raised to provide additional safety for cyclist and vehicular traffic. (*Ibid*.) **Trails.** Community, Greenway, and Regional trails within Centennial also provide for shared use pathways by bicycle, pedestrian, and in some cases equestrian activities. (*Ibid*.) All major Project roadways would include bicycle infrastructure, as can be seen on Specific Plan Figures 3-2 and 3-3. See also Figures 3-6: Six-Lane Major Highway, 3-7: Four-Lane Secondary Highway, 3-8: Collector 1 – with Median, 3-9 Collector 2- without Median, and 3-10: Collector 3 – with Parking, 3-11 Industrial Collector for illustrations of bike lanes incorporated into rights-of-way. (*Id.,* Appendix 4.0-A, pp. 3-10 to 3-16).
397	2017 OPR List, p. 344; CARB List, p. 8	Expand urban forestry and green infrastructure in new land development.	Yes	The Project is subject to the Los Angeles County Tree Planting Ordinance, which includes requirements for new development projects to plant new trees at a rate of 1 tree for every 5,000 square feet of building footprint per lot for primarily residential projects with more than 4 units, and 3 trees for every 10,000 square feet of developed lot area for non-residential and mixed use. (DRP 2017, pp. 5.21-36, 5.21-

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				37) Trees planted must (1) provide adequate shade; (2) be resistant to local pests and diseases; (3) be non-invasive species; and (4) be appropriate for the planting location, pursuant to Section 22.56.2100 of the ordinance. (*Id.,* p. 5.21-37) Per the Centennial Green Development Program, the Project will reduce heat loads from glazing by strategically locating shade trees. (*Id.,* Appendix 2-A to Appendix 4.0-A, Table 2-A-1 at p. 20) The planting of an estimated 35,123 new trees, as required by the County Tree Planting Ordinance would result in an estimated long-term sequestration of 24,867 metric tons of carbon dioxide equivalent (MTCO2e). This is a conservative analysis, as it is likely that many more trees would be planted than the minimum required by the County ordinance. (*Id.,* p. 5.21-83)
398	2017 OPR List, p. 344; CARB List, p. 8	Require preferential parking spaces for park and ride to incentivize carpooling, vanpooling, commuter bus, electric vehicles, and rail service.	Yes	Project transit centers will provide options for park and ride facilities, shuttle stops, bike rental, and other options for public transit services. (DRP 2017, Appendix 4.0-A, p. 1-7) The installation of Park-And-Ride Lots near transit stops and carpool lanes that will attract commuters is also included in the roster of potential transportation and vehicle demand measures to be implemented by the TMA to meet transportation demand performance standards articulated in MMs 10-25 and 10-26, as indicated in Table 2-C-2 of the Project's Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 14) MM 21-17 requires that non-residential buildings shall have preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles. (*Id.,* pp. 5.21-91, -92)

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
399	2017 OPR List, p. 344	Require a transportation management plan for specific plans.	Yes	MMs 10-25 and 10-26 require the implementation of on-site programs to reduce vehicle trips, including the formation of a Transportation Management Association (TMA) that would coordinate and manage a Ride Share Program, Transit Program, and Commuter Bus Program. (DRP 2017, p. 5.10-104) MM 10-25 requires implementation of the Mobility Plan, which includes two transit hubs to serve as alternative means of transportation on the Project site, and requires the creation and ongoing operation of the TMA. (*Id.,* p. 5.10-153) These mandatory measures require the reduction of single-occupancy automobile use for off-site commutes by 20 percent and require the reduction of single occupancy automobile uses within the Project site by 30 percent. (*Ibid.*) MM 10-26 lays out key Transportation Demand Management (TDM) elements that are key to the Mobility Plan and specifies that the TMA will fund and manage ongoing operation of transportation programs, including but not limited to transit and on-demand services. (*Id.,* p. 5.10-154)
400	CARB List, p. 8	Require a transportation management plan for specific plans which establishes a numeric target for non-SOV travel and overall VMT	Yes	MMs 10-25 and 10-26 require the implementation of on-site programs to reduce vehicle trips, including the formation of a Transportation Management Association (TMA) that would coordinate and manage a Ride Share Program, Transit Program, and Commuter Bus Program. (DRP 2017, p. 5.10-104) MM 10-25 requires implementation of the Mobility Plan, which includes two transit hubs to serve as alternative means of transportation on the Project site, and requires the creation and ongoing operation of the TMA. (*Id.,* p. 5.10-153) These mandatory measures require the reduction of single-occupancy automobile use for off-site commutes by 20 percent and require the reduction of single occupancy automobile uses within the Project site by 30 percent. (*Ibid.*) MM 10-26 lays out key Transportation Demand Management (TDM) elements that are key to the Mobility Plan and specifies that the TMA will fund and manage ongoing operation of transportation programs, including but not limited to transit and on-demand services. (*Id.,* p. 5.10-154)

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
401	2017 OPR List, p. 344	Develop a rideshare program to facilitate participation of commuters to the major employment centers.	Yes – Functional Equivalent Required	As part of the Project's overall transportation demand management (TDM) strategy to reduce the dependence on the private automobile, which would result in a consequential reduction in overall volume of Project-generated trips off site, the Project Applicant will participate in or form a Transportation Management Association (TMA) to serve the residents and employees of businesses within the Project area or will be organized in conjunction with an existing organization in the Antelope Valley or Santa Clarita area. (DRP 2017, p. 5.10-141) If the former, the Centennial TMA will specifically develop strategic linkages with other Antelope Valley/Santa Clarita Valley TMAs or like organizations in order to maximize transit efficiencies and services. (*Ibid*.) Such coordination will also help match ride sharers and provide information on transit options; The TMA's purpose will be to coordinate and facilitate transit and rideshare usage to serve as many riders as possible. (*Ibid*.) Relevant TMA activities include supporting the formation of vanpools/carpools and rideshare matching databases. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 10) Such measures are included on the roster of TMA measures for the Project, as indicated in Table 2-C-2 in the Mobility Plan. (*Id.,* Appendix 2-C to Appendix 4.0-A, pp. 12-13, 16) Measure language is as follows: • Provide Ride-Sharing Programs (e.g. Uber Pool, Lyft Line) – that gives people a way to commute to work besides their personal vehicle by the sharing of a vehicle and costs with other people headed in the same direction. Traffic volume is reduced by encouraging carpooling and rideshare passengers tend to have relatively long commutes which reduce more vehicle miles because the trips that are reduced are twice as long on average. (*Id.,* p. 12) • Implement Car-Sharing Program (e.g. Zipcar, Car2Go) – either residential-based or employer-based programs that allow people to have on-demand access to shared vehicles, with costs determined through mileage or hourly rates with deposits or annual membership fees. Both residential and employer-based
402	CARB List, p. 8	Develop a rideshare program targeting commuters to major employment centers	Yes – Functional Equivalent Required	

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				programs encourage carpooling and therefore reduce traffic volumes. (*Id.,* p. 13) • Implement School Pool Program – similar to a ride-sharing program for school children and differs from bussing services to public schools since the program helps match parents to take students to private schools, or to schools where students cannot walk or bike but do not meet the requirements for bussing. Traffic volume is reduced by encouraging parents to share their vehicle. (*Ibid*.) • Ridesourcing [or Transportation Network Companies (TNC)] (e.g. Uber, Lyft) arranges rides for passengers with drivers that use their privately-owned vehicle for a fee and can provide rides to and from stations and help with first/last mile situations. Ridesourcing helps reduce vehicle trips by providing a different way to get to the destination besides a personal vehicle. (*Id.,* p. 16)
403	2017 OPR List, p. 344; CARB List, p. 8	Require design of bus stops/shelter/express lane in new development to promote the usage of mass-transit.	Yes	Project proposes to provide two Transit Hubs to improve the efficiency of matching localized trips with regional (off-site) trips and connect to multi-modal transportation options such as local and regional bus services, on-demand car services, carpools and vanpools, and that provides secure and convenience bike storage for cyclists. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 17) Transit Hubs shall provide a minimum of one alternative energy vehicle charging stations with multiple outlets, free wifi, and real time tracking of transit. (*Ibid*.) It would be the responsibility of the TMA to provide transit route maps and schedules. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 10) Transit Hubs shall have adequate pedestrian, bicycle, and parking facilities for off-site transit connection service. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 17) The centers would provide convenient access to public bus transportation, carpooling, park and ride, special charter operations, and/or similar types of activities related to local or off-site transit usage. (*Id.,* p. 4-37). An information center would be an important part of the services offered, and the primary objective of such centers is to provide focal and gathering points for a variety of private and public transportation activities, all of which reduce dependency on the private

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				automobile. (*Ibid*.) Commuter service may be provided by Santa Clarita Transit, Antelope Valley Transit, or a combination of both, and it is envisioned that commuter service from Centennial would be integrated with existing services provided by these operators and would connect Centennial to existing Metrolink service, future high-speed rail service, and employment centers throughout the region. (*Id.,* p. 4-38) These centers would, at least initially, be used to promote carpooling and vanpooling until such time as ridership justifies commuter service. (*Ibid*.) The following metrics also ensure that the Project can accommodate a community transit system: A transit route easement no less than 25 feet wide shall be reserved in the CCD (connecting the Town Center, BP and I/C areas) and also run northerly connecting to the Village Five Core; If a transit system is implemented, transit stop easements shall be reserved in all Village Cores, the Town Center, and CCD, as well as other areas where necessary, efficient, and beneficial to provide transit access. (*Id.,* Appendix 2-C to Appendix 4.0-A, p. 9)
404	2017 OPR List, p. 344; CARB List, p. 8	Require that gas outlets be provided in residential backyards for use with outdoor cooking appliances such as gas barbeques if natural gas service is available.	Yes	Residential buildings will have exterior electrical receptacles and natural gas or propane hookups per MM 11-5 (DRP 2017, p. 5.11-80), including on patios. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20)
405	2017 OPR List, p. 344; CARB List, p. 8	Require that electrical outlets with installed on the exterior walls of both the front and back of residences to promote the use of electric landscape maintenance equipment.	Yes	All landscape maintenance equipment at Centennial will be electric. The Project will incorporate an outreach and education program for the Centennial property owners, in collaboration of SCAQMD, to reduce the use of gasoline-or diesel-powered landscaping equipment. (DRP 2017, p. 5.21-79)
406	2017 OPR List, p. 345; CARB List, p. 8	Require the design of an electric box is residential unit garage to promote electric vehicle usage.	Yes	Per MM 21-15 (as updated in response to Comment F.8-95), the Project will provide one 208/240 VAC receptacle for charging electric vehicles in each detached and attached single-family residence in a manner consistent with 2016 CALGreen Code Voluntary Tier 1 Section A4.106.4.1. (DRP 2017, p. 5.21-91)

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
407	2017 OPR List, p. 345; CARB List, p. 8	Require electric vehicle charging station (conductive/inductive) and signage for nonresidential developments.	Yes	The Project provides extensive electric vehicle charging facilities, as required in MMs 21-16, 21-19, 11-4, and 11-6, discussed further in row 129. As indicated in Table 2-C-1 of the Mobility Plan, facilities could accommodate inductive and conductive charging. (DRP 2017, Appendix 2-C to Appendix 4.0-A, p. 7).
408	2017 OPR List, p. 345; CARB List, p. 8	Provide electric outlets to promote electric landscape maintenance equipment be utilized to the extent feasible on parks and public/quasi-public lands.	Yes	All landscape maintenance equipment at Centennial will be electric. (DRP 2017, p. 5.21-79)
409	2017 OPR List, p. 345	Require each residential unit to be pre-plumber and structurally engineered for the future installation of a solar energy system.	Yes	MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature, and the CALGreen Code requires that all residential houses be constructed with "solar ready" roofs, which means they must be constructed in a manner capable of accommodating solar collection systems and being wired to accept such systems. Further, the Specific Plan's Green Development Program requires that all residential buildings be compatible with solar panel systems, and that all commercial and residential structures include passive solar design techniques. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 15) It also requires the installation of onsite solar panel systems on roof areas for a minimum of 30 percent of all single-family detached and attached residential units; a minimum of 30 percent of all multi-family residential units, and a minimum of 60 percent of buildings located within Business Park land use designations. (*Ibid*.)
410	CARB List, p. 9	Require each residential unit to be "solar ready" including installing the appropriate hardware and proper structural engineering	Yes	MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature, and the CALGreen Code requires that all residential houses be constructed with "solar ready" roofs, which means they must be constructed in a manner capable of accommodating solar collection systems and being wired to accept such systems. Further, the Specific Plan's Green Development Program requires that all residential buildings be compatible with solar panel systems, and that all commercial and residential structures include

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				passive solar design techniques. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 15) It also requires the installation of onsite solar panel systems on roof areas for a minimum of 30 percent of all single-family detached and attached residential units; a minimum of 30 percent of all multi-family residential units, and a minimum of 60 percent of buildings located within Business Park land use designations. (*Ibid*.)
411	2017 OPR List, p. 345; CARB List p. 9	Require the installation of energy conservation appliances such as tankless water heaters and whole house fans.	Yes	Uses associated with the Project are subject to appliance efficiency requirements for water heaters. (California Appliance Efficiency Regulations (Title 20 Standards), Sections 1605.1(f), 1605.3(f).) Consistent with the Los Angeles County Community Climate Action Plan, a minimum of 10 percent of all single-family detached residential units at Project buildout shall either include an installed solar water heater, tankless water heater, or other energy efficient water heater technology approved by the County. (DRP 2017, p. 5.21-74) Further, Single-family detached residential units with roof areas that are within 30 degrees of true south shall include plumbing appropriate for a solar water heating running from the installed water heater to the solar-ready roof areas, and those with roof areas that are not within 30 degrees of true south shall be plumbed to accommodate an on-demand tankless water heater. (*Ibid*.) Further, per MM 21-5, the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that a minimum of 70 percent of public and community pools and spas shall be equipped with active solar heating systems where heating is necessary or desired. (*Id.,* p. 5.21-89) The Centennial Green Development Program requires the use of removable covers for pools and spas, which are the functional equivalent on automatic covers with regard to efficiency. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 20) Automatic covers may result in accidental drownings or other injuries. Efficient pumps and motors for pools and spas are already required under applicable Building Energy Efficiency Standards. The Project incorporates passive and energy-efficient cooling and heating systems, as described in rows 221 through 232.

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
412	2017 OPR List, p. 345; CARB List, p. 9	Require each residential and commercial building be equipped with energy efficient AC units and heating system with programmable thermostat timers.	Yes	Uses associated with the Project are subject to appliance efficiency requirements for heaters and air conditioners. (Title 20 Standards, Sections 1605.1(b),(c),(d),(e), 1605.3(b),(c),(d),(e) as applicable.) MM 21-8 requires that Energy efficient major appliances and HVAC systems that meet the more stringent of applicable California Energy Commission requirements or ENERGY STAR requirements, or equivalent, shall be exclusively offered by residential builders, and this includes room air conditioners. (DRP 2017, p. 5.21-90) See also the Centennial Green Development Program. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 18) Buildings will also be required to use timed or smart remote communicating thermostats in residential and nonresidential buildings, including meeting applicable integration requirements for response signals from the electric utility. (*Id.,* p. 20) All Project buildings will include appropriately sized and high-efficiency heating and cooling systems. (*Id.,* Appendix 4.0-A, p. 3-62)
413	2017 OPR List, p. 345; CARB List, p. 9	Require each residential and commercial building utilize low flow water fixtures such as low flow toilets and faucets.	Yes	Per the Centennial Green Development Program (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 23), the Project Applicant/Developer shall provide plans and specifications to the County demonstrating that nonresidential building shall be constructed with indoor plumbing fixtures and fixture fittings that would reduce the overall use of potable water within the building by 12 percent, consistent with CALGreen Tier 1 nonresidential voluntary measures as prescribed in Section A5.303.2.3.1 of the code. Additionally, water efficient fixtures that meet or exceed state or County CALGreen Code performance shall be installed, including but not limited to the following: For non-residential buildings: • Showerheads 2.0 gpm @ 80 psi; • Bathroom faucets 0.5 gpm @ 60 psi; • Kitchen faucets 2.6 gpm @ 60 psi; • Toilets 1.28 gallons/flush; • Urinals 0.5 gallons/flush (*Ibid*.)

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				For single family and multifamily residential buildings: • Kitchen Faucets. The maximum flow rate of kitchen faucets shall not exceed 1.5 gallons per minute at 60 psi. Kitchen faucets may temporarily increase the flow above the maximum rate, but not to exceed 2.2 gallons per minute at 60 psi, and must default to a maximum flow rate of 1.5 gallons per minute at 60 psi. (*Ibid*.) • Appliances. Dishwashers and clothes washers in residential buildings shall comply with the following: Install at least one qualified ENERGY STAR appliance with maximum water use as follows: 1. Standard Dishwashers – 4.25 gallons per cycle. 2. Compact Dishwashers – 3.5 gallons per cycle. 3. Clothes Washers – water factor of 6 gallons per cubic feet of drum capacity. (*Ibid*.)
414	2017 OPR List, p. 345; CARB List, p. 9	Require the use of energy efficient lighting for all street, parking, and area lighting.	Yes	Enacted in 2007, AB 1109 required the CEC to adopt minimum energy efficiency standards for general purpose lighting, to reduce electricity consumption 50 percent for indoor residential lighting and 25 percent for indoor commercial lighting. The Centennial Green Development Program also requires builders to use energy efficient lighting with automated controls in compliance with all applicable requirements of Title 24, Part 6, Section 150.0(k). (DRP 2017, Appendix 2-A to appendix 4.0-A, p. 19) Outdoor lighting associated with the Project must also meet applicable Title 20 appliance efficiency standards, as must emergency lighting and self-contained lighting. (Title 20 Standards, Sections 1605.1(j),(k),(n), 1605.3(j),(k),(n).) For any necessary Project improvement involving traffic lighting, traffic signal module and traffic signal lamps, the Project must comply with applicable energy efficiency regulations. (Title 20 Standards, Sections 1605.1(m), 1605.3(m).) Outdoor lighting is also subject to Title 24 efficiency requirements. (See Title 24 Part 6 Compliance Manual, Section 6.) The Centennial Green Development Program incorporates many relevant requirements to ensure energy efficient and environmentally sensitive outdoor lighting, as discussed further in row 284.

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				The Centennial Green Development Program incorporates many relevant requirements to ensure energy efficient and environmentally sensitive outdoor lighting, as follows: • Exterior lighting shall not cause unacceptable light trespass and shall be fully shielded. (*Ibid*.) • Outdoor lighting shall be turned off using automatic control devices or systems between the hours of 10:00 PM and sunrise of the following day in commercial, business park, and mixed-use areas, unless required by the County Building Code. If the property operates beyond 10:00 PM, then outdoor lighting shall be turned off 1 hour after the operation ends for the day. (*Ibid*.) • Outdoor lighting for safety and security reasons is allowed after 10:00 PM only if fully shielded motion sensors are used to turn lighting after 10:00 PM and the sensors turn the lighting of automatically no more than 10 minutes after the area is vacated or at least 50 percent of the total lumen levels are reduced or 50 percent of the total outdoor light fixtures are turned off between 10:00 PM and sunrise. (*Ibid*.) • Outdoor lighting in residential and open space areas that are over 15 feet in height shall have an output no greater than 400 lumens. (*Ibid*.) • The maximum height of outdoor lighting fixtures shall be 20 feet in Residential and Open Space areas, 30 feet in Commercial, Mixed Use, and Public areas, and 35 feet in Business Park areas. (*Ibid*.) • The following outdoor lighting is prohibited unless mandated for health and safety reasons by a public agency: drop-down lenses, mercury vapor lights, ultraviolet lights, search lights, laser lights and any outdoor lighting that flashes, blinks, alternates or moves. (*Ibid*.) • Outdoor light fixtures in outdoor recreational areas shall be mounted, aimed, and fully shielded to that light beams fall onto

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				activity areas and no unacceptable light trespass occurs on surrounding areas or properties. Outdoor lighting shall only provide the minimum necessary to illuminate recreational activities areas and shall be no more than 75 feet high. Preferably, these fixtures shall also use high pressure sodium or metal halide lamps. (*Ibid*.) • Outdoor advertising signs, business signs and roof and freestanding signs that are lighted shall be fully shielded. Externally mounted light fixtures shall be mounted on the top of the sign and shall be oriented downward. Externally mounted bulbs or lighting tubes for signs shall not be visible from adjoining properties or public rights-of-way, unless such bulbs or tubes are filled with neon, argon, krypton or other self-illuminating substance. (*Ibid*.) • Street lights (consistent with rural design) shall be limited to urban cross sections with sidewalks, curbs and gutters or at intersections and driveways on County roads, where necessary to alleviate traffic hazards, improve traffic flow and/or promote safety and security of pedestrians. (*Ibid*.) • Limit the hours of community-managed lighting on public streets to midnight unless later lighting will advance public safety and walkability goals. (*Ibid*.)

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
415	2017 OPR List, p. 345; CARB List, p. 9	Require the landscaping design for parking lots with shade trees to reduce urban heat island.	Yes	The Centennial Specific Plan contains parking lot landscaping guidelines that require minimum 4-foot by –foot area per tree, measured from the inside of the planter area, and minimum one 15-gallon tree is required for 10 parking spaces. (DRP 2017, Appendix 4.0-A, p. 2-66) The Specific Plan also contains parking lot landscape coverage minimums for individual Land Use Designations, which are in addition to general minimum landscape coverage requirements in the commercial/employment designations and Business Park designation (*Id.,* pp. 2-28, 2-32). The Specific Plan also specifies that for Commercial Centers, parking lots should be landscaped to provide shade. (*Id.,* p. 3-32) The Project is subject to the Los Angeles County Tree Planting Ordinance, which includes requirements for new development projects to plant new trees in parking lots larger than 15 spaces, including a requirement to demonstrate at least 50 percent coverage within 15 years of construction. (See Los Angeles County Department of Regional Planning Tree Planting Guide, available at: http://planning.lacounty.gov/assets/upl/project/tpo_guide.pdf.)
416	2017 OPR List, p. 345; CARB List, p. 9	Incorporate water retention in design of parking lots and landscape.	Yes	The Project will comply with the County of Los Angeles Low Impact Development Standards Manual. (DRP 2017, Appendix 2-A to Appendix 4.0-A, p. 14) The overall physical design for Centennial respects the natural setting by preserving major drainage features and open space through careful grading that respects the topography, which in turn allows for compact development that maximizes open space. (*Id.,* Appendix 2-B to Appendix 4.0-A, p. 7) Stormwater management methods will include a complementary combination of on-site treatment, traditional underground storm drainage facilities, multi-purpose storm-water basins, and drainage courses. (*Id.,* Appendix 4.0-A, p. 2-58) Multi-purpose greenway basins will filter urban runoff and excess storm flow recharge associated with development's inevitable increase in impermeable surfaces. (*Ibid*.) Additional techniques will include, but are not limited to, filter strips, bioretention areas, and swales in parkways, all of which can incrementally reduce runoff and improve water quality. (*Ibid*.) See Centennial Specific Plan Section 3.6, Drainage Plan, for further information. The Project's Green Development Program requires that 60 percent of public and OA trails

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
				(Project Green Trails will be 80 percent) with permeable materials, which may include decomposed granite, soilcrete, gravel pavers, grass pavers, variations on different types of grids and blocks, loose aggregate, poly-pavement, permeable asphalt and concrete, and as identified in the Trails Plain in Specific Plan Section 3.11.7. (*Id.,* Appendix 2-A to Appendix 4.0-A, p. 10) For Project streets, street design proposals for County review will include technically feasible (given expected future uses) and legally feasible (given applicable ordinances and other requirements) street designs that include permeable pavement, groundcovers, or other measures to reduce use of concrete and asphalt. (*Ibid*.)

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
417	CARB List, p. 9	Require the development project to propose an off-site mitigation project which should generate carbon credits equivalent to the anticipated GHG emission reductions. This would be implemented via an approved protocol for carbon credits from CAPCOA, the CARB, or other similar entities determined acceptable by the local air district.	N/A	Additional GHG mitigation has been determined not to be required for this project. Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion. Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although cumulative GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion.
418	CARB List, p. 9	Require the project to purchase carbon credits from the CAPCOA GHG Reduction Exchange Program, American Carbon Registry, Climate Action Reserve, or other similar carbon credit registry determined to be acceptable by the local air district.	N/A	Additional GHG mitigation has been determined not to be required for this project. Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion. Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although cumulative GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion.

TABLE 10: CARB LIST AND 2017 OPR LIST IDENTIFIED FOR CONSIDERATION BY LEAD AGENCY

Row	Source	Measure	Included	Response
419	CARB List, p. 9	Encourage the applicant to consider generating or purchasing local and California-only carbon credits as the preferred mechanism to implement its off-site mitigation measure for GHG emissions and that will facilitate the State's efforts in achieving the GHG emission reduction goal.	N/A	Additional GHG mitigation has been determined not to be required for this project. Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion. Project-related GHG emissions are regulated, and the project complies with the regional land use plan that has been affirmed as meeting applicable GHG regional reduction goals from the land use and environmental sectors. Although cumulative GHG emissions remain significant and unavoidable, further reductions of GHG by the project are not required by CEQA. See response to Comment F.8-96 for further discussion.

Response to Comment F.8-205:

As discussed in response to Comment F.8-203, and in the Draft EIR at page 1-1, Public Resources Code §21100(b)(3) requires the EIR set forth feasible mitigation measures to minimize significant environmental effects of the Project. The Commenter correctly notes that the Lead Agency's determination that a particular mitigation measure is infeasible must be supported by substantial evidence, as required by CEQA Guidelines § 15091(b). The Commenter is also correct that the EIR must propose and describe feasible mitigation measures to minimize significant environmental effects even if those significant effects cannot be reduced to a less than significant level and are therefore unavoidable. However, CEQA does not require the EIR to analyze every conceivable mitigation measure.[2234] Rather, the EIR need only analyze mitigation measures that are feasible, practical and effective.[2235] Please see response to Comment F.8-204, which addresses mitigation measures proposed by the Commenter for inclusion in the EIR.

Response to Comment F.8-206:

A site-specific probabilistic seismic hazard analysis was performed for the Project site consistent with State and County building code requirements.[2236] This site-specific analysis is more accurate and relevant to assessing seismic parameters for potential development than the United States Geological Survey (USGS) map. The USGS map cited in the comment is meant to be used as a broad (i.e., Statewide), general (i.e., unquantified) indication of potential shaking potential over different portions of the state. The risk of both primary (i.e., surface rupture and ground shaking) and secondary (e.g., liquefaction, landslides) seismic risks are fully disclosed and analyzed in Section 5.1 of the Draft EIR. Further, preparation of the Draft EIR involved a series of reviews by the County's Geotechnical and Materials Engineering Division of both the preliminary geotechnical reports prepared for the Project and the Draft EIR Section 5.1. It is also noted that the 2003 map cited in the comment has been superseded by a 2016 version.[2237] As stated on this map, "The resulting earthquake shaking potential is used in developing building code design values, estimating future earthquake losses, and prioritizing earthquake retrofit." Calculations of earthquake shaking hazard for California are part of a cooperative project between USGS and California Geological Survey (CGS), and are part of the National Seismic Hazard Maps. On the National Seismic Hazard Maps website, the difference between geologic hazard and geologic risk is discussed. As stated on this website, "Bottom line: High earthquake hazard does not mean high risk. Also, while you can't change the underlying earthquake hazard, you can reduce earthquake risk by managing the built environment".[2238] This is consistent with, and supports, the following statement on Draft EIR page 5.1-15: "Compliance with geotechnical recommendations, which reflect building code requirements, would result in the construction of earthquake-resistant structures. However, in the event of a major seismic

[2234] *Gilroy Citizens for Responsible Planning v. City of Gilroy* (2006) 140 Cal.App.4th 911, 935; *San Franciscans for Reasonable Growth v. City & County of San Francisco* (1989) 209 Cal.App.3d 1502, 1519

[2235] *Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 365

[2236] DRP 2017, pp. 5.1-11 and -12

[2237] Available at: ftp://ftp.conservation.ca.gov/pub/dmg/pubs/ms/048/MS_048_revised_2016.pdf.

[2238] U.S. Geological Survey (USGS). 2017 (Last accessed August 31). Earthquake Hazards Program: Introduction to the National Seismic Hazard Maps. Reston, VA: USGS. https://earthquake.usgs.gov/hazards/learn/.

event, no structure is completely safe from damage. Incorporation of these measures reduces the potential risk from seismic and geotechnical conditions to the maximum extent practicable under current engineering practice." Additionally, the National Seismic Hazard Maps website states "there are versions of the maps designed specifically for the public, to help people learn more about the hazard from earthquake ground shaking in their area".[2239] An example of such a map is then presented, and is the Frequency of Damaging Earthquake Shaking Around the U.S..[2240] As shown on this map, the risk for earthquake shaking throughout Southern California is essentially the same, with a reduced risk along the southeastern portion of the State. This is consistent with, and supports, the following statement on Draft EIR page 5.1-15: "It should be emphasized that, while the Project site has identified geotechnical constraints, the overall seismic risk at the Project site is the same as Southern California in its entirety." In other words, because of the extremely high seismicity throughout Southern California, the nearness of one or more active faults does not have a direct correlation to risk of a seismic event and the magnitude of the event in a certain area.

Regarding the proposed fault setback, the Geologic Safety Zone setback required for the two unnamed faults within the Project site is 100 feet, potentially reduced to 50 feet, to be consistent with the requirements of the Alquist-Priolo Earthquake Fault Zoning Act (AP Act). As discussed on page 5.1-3, "City and County jurisdictions must require a geologic investigation to demonstrate that a proposed development project, which includes structures for human occupancy, is adequately set back (usually at least 50 feet) from an active fault prior to permitting." As discussed on pages 5.1-16 through 5.1-17, consistent with State regulations, there would no building on or within the required setback (usually at least 50 feet) of the Alquist-Priolo Earthquake Fault Zone for the San Andreas Fault. Additionally, the "purpose of the AP Act is to reduce the threat to life and property, specifically from surface fault rupture, by preventing the construction of building used for human occupancy of the surface trace of active faults".[2241] Therefore, the setbacks of 50 to 100 feet are appropriate for purposes of avoiding impacts associated with surface rupture of an active fault.

The setback zone for the San Andreas Fault is incorporated into the Geologic Safety Zone, which also establishes building setbacks for the two unnamed on-site faults. However, the risks from surface rupture of a fault is a different issue than the risks from strong seismic ground shaking during an earthquake; accordingly, the State CEQA Guidelines includes two separate thresholds for these issues.

Response to Comment F.8-207:

It is not the case that the Draft EIR only evaluates seismic hazard at the center of the Project site. Rather, the Draft EIR uses a combination of appropriate methodologies to evaluate seismic hazard on the entire Project site. The Draft EIR explains that Geocon used a combination of deterministic and probabilistic methodologies to prepare its 2015

[2239] *Ibid.*
[2240] Available at: https://earthquake.usgs.gov/hazards/learn/images/2014hazmap-induced-lg.gif.
[2241] DRP 2017, p. 5.1-3

Preliminary Geologic Summary Report.[2242] For the Deterministic Seismic Hazard Analysis (DSHA), Geocon used EZ-FRISK software, which indicates that, using coordinates generally correlating to the central portion of the Project site, there are 29 known active faults located within a search radius of 50 miles.[2243] Draft EIR Table 5.1-1 therefore lists the estimated maximum earthquake magnitude (M) and peak ground acceleration (g, or percent of the force gravity) for the most dominant faults, in relationship to the central portion of the Project site, listed by increasing distance, for the three different acceleration-attenuation relationships (i.e., mathematical equations related to group motion) applied in the DSHA.[2244] As noted in response to Comment F.8-206, the National Seismic Hazard Maps website provides a map titled Frequency of Damaging Earthquake Shaking Around the U.S..[2245] As shown on this map, the risk for earthquake shaking throughout Southern California is essentially the same, with a reduced risk along the southeastern portion of the State. This is consistent with, and supports, the following statement on Draft EIR page 5.1-15: "It should be emphasized that, while the Project site has identified geotechnical constraints, the overall seismic risk at the Project site is the same as Southern California in its entirety." In other words, because of the extremely high seismicity throughout Southern California, the nearness of one or more active faults does not have a direct correlation to more or less risk of a seismic event and the magnitude of the event in a certain area. As such, the evaluation of seismic hazard (which is not equivalent to risk, as discussed in response to Comment F.8-206) based on the approximate center of the site is an appropriate evaluation methodology.

Further, while listing of peak accelerations is useful for comparison of potential effects of fault activity in a region, other considerations are important such as frequency and duration of motion and soil conditions underlying the site. Therefore, Project site soil was studied (see next paragraph), and in conjunction with the DSHA, Geocon also conducted a Probabilistic Seismic Hazard Analysis (PSHA).

The PSHA is based on the premise that the potential for an earthquake in an area is a function of the combined annual probabilities for earthquakes on all faults capable of generating energy of a certain level in that area, and assumes that earthquakes occur randomly in time and the annual probability for earthquake occurrences is the same from year to year; A higher frequency of small to moderate earthquake occurrences is also considered.[2246] The EZ-FRISK program used accounts for earthquake magnitude as a function of fault rupture length, and site acceleration estimates are made using the earthquake magnitude and distance from the site of the rupture zone. The program also accounts for uncertainty in each of the following: (1) earthquake magnitude, (2) rupture length for a given magnitude, (3) location of the rupture zone, (4) maximum possible magnitude of a given earthquake, and (5) acceleration at the site from a given earthquake along each fault. By calculating the expected accelerations from considered earthquake sources, the program calculates the total average annual expected number of occurrences of site acceleration greater than a specified

[2242] *Id.,* Appendix 5.1-A
[2243] *Id.,* p. 5.1-10
[2244] Ibid.
[2245] Available at https://earthquake.usgs.gov/hazards/learn/images/2014hazmap-induced-lg.gif.
[2246] DRP 2017, p. 5.1-11

value.[2247] The Draft EIR therefore includes Table 5.1-2, which presents the site-specific probabilistic seismic hazard parameters including the three different acceleration-attenuation relationships (i.e., mathematical equations related to ground motion) applied in the PHSA, and the probability of exceedance.[2248] In addition to the three relationships identified in the EZ-FRISK program, the CGS has a program that calculates the ground motion for a 10 percent of probability of exceedance in 50 years, based on an average of several attenuation relationships, and Draft EIR Table 5.1-3 presents the calculated results from the Probabilistic Seismic Hazards Mapping Ground Motion page from the CGS website.[2249]

Soil and geologic conditions were previously identified by observation of exploratory excavations, geologic mapping, interpretation of stereo aerial photographs, and review of published geologic literature.[2250] Surficial deposits encountered included previously placed fill, topsoil, alluvium, colluvium, and shallow landslide debris.[2251] The Draft EIR and its Appendix 5.1-A describe each type of soil and geologic unit in detail, appropriately evaluate potential adverse impacts due to the soil or geologic unit, and suggest mitigation that would reduce impacts to a less than significant level.[2252]

The Draft EIR also very specifically discloses the location of the San Andreas Fault and analyzes its potential impacts on any part of the Project site. It acknowledges that "the only fault in the vicinity of the Project site within a designated Alquist-Priolo Earthquake Fault Zone is the San Andreas Fault..." and notes that the "Fault Zone and fault line cross the southwestern edge and southernmost point of the Project site, as shown on Exhibit 5.1-2, Geologic Hazards."[2253] Due to the proximity of both the San Andreas Fault and Garlock Fault to the Project site, a fault research company called Earth Consultants International (ECI) conducted a detailed fault investigation on the Project site and evaluated potential hazards as a result of fault locations in relation to the Project site and planned development areas.[2254] Per the Geocon report, earthquakes that might occur on the San Andrea Fault Rift Zone are potential generators of significant ground accelerations at the site (0.73 g for a 10 percent probability in 50-year occurrence) should an earthquake on the fault occur.[2255] However, foundation systems can be designed to withstand these relatively high ground accelerations, and secondary impacts such as liquefaction can be mitigated by remedial grading, structural design and foundations or ground improvement techniques; active fault zones including this one can also be mitigated by implementing setback zones from Alquist-Priolo Earthquake Fault Zones.[2256] Accordingly, as shown on Draft EIR Exhibit 5.1-2, the Project has been designed to avoid development in areas near the San Andreas Earthquake Fault Zone, which are instead proposed as open space and drainage areas.[2257]

[2247] *Id.,* Appendix 5.1-A, p. 10
[2248] *Id.,* p. 5.1-12; *Id.,* Appendix 5.1-A, p. 11
[2249] *Ibid*.
[2250] *Id.,* Appendix 5.1-A, p. 3
[2251] *Ibid*.
[2252] *Id.,* pp. 5.1-6 to -9; Appendix 5.1-A, pp. 3-7, 13-14
[2253] *Id.,* pp. 5.1-9, -10
[2254] *Id.*, Appendix E of Appendix 5.1-A; *Id.,* Appendix 5.1-A, p. 8
[2255] *Id.,* Appendix 5.1-A, p. 13
[2256] *Ibid*.
[2257] *Id.,* p. 5.1-16

The Draft EIR and the Geocon report conclude that there are no soil or geologic conditions present on or near the Project site that would preclude the safe development of all proposed land uses on the Project site, given incorporation of all existing and future, tract map-level, geotechnical recommendations into grading and construction plans and specifications; this includes compliance with County subdivision specifications, County zoning and building code requirements, and the Project's Grading Plan, and the Specific Plan's Hillside Design Guidelines.[2258] All geotechnical recommendations found in the previously prepared and 2015 Geocon reports are standard engineering techniques, and the 2015 report has determined that Project development is feasible provided the seismic and other geotechnical constraints identified within the Project site's grading boundaries are addressed, via future, tract map-level geotechnical studies to be performed as part of Project implementation consistent with County and State building code requirements.[2259] The Project shall incorporate all applicable geotechnical recommendations identified in the geotechnical documents previously prepared for the Project, including those reviewed and compiled in the 2015 Geocon report,[2260] and those to be identified in the geotechnical reports for the Final Engineering and Grading Plans (which must incorporate the findings of all soils engineering and geologic studies) for individual tract maps and the associated final grading plans to be processed as the Project is implemented.[2261] Implementation of these requirements would ensure that impacts related to the proximity to active faults, including proximity to the San Andreas Earthquake Fault Zone, would be less than significant. With regard to the sufficiency of mitigation, see also responses to Comments F.8-208 and F.8-210.

Response to Comment F.8-208:

Potential geologic and seismic impacts of the Project are appropriately disclosed and assessed in Draft EIR Section 5.1 and in Geocon's 2015, site-specific *Preliminary Geologic Summary Report*, which is included in the Draft EIR as Appendix 5.1-A. With regard to geologic conditions on the Project site, the surficial and geologic units on site are described and analyzed, including previously placed fill, topsoil, alluvium, colluvium, shallow landslide debris, Older Alluvium, the Hungry Valley Formation, the Oso Canyon Formation, the Quail Lake Formation, and the Neenach Volcanic Formation.[2262] The approximate locations of the surficial and geologic units are also disclosed.[2263] These conditions were determined based on site reconnaissance, geologic field mapping by an engineering geologist, and subsurface excavations with small and large diameter boring and exploratory backhoe trenches; the trenches were used to identify geologic contacts, and observe and sample near-surface soil conditions.[2264] Small diameter borings were drilled in alluvium and deep colluvium to evaluate thickness, groundwater conditions and the in situ condition of geologic deposits, while large diameter borings were performed in proposed cut slopes to characterize structural or lithologic features that could potentially impact slope-stability.[2265] In August

[2258] *Id.,* page 5.1-15
[2259] *Ibid*.
[2260] *Id.,* Appendix 5.1-A
[2261] *Id.,* p. 5.1-16
[2262] *Id.,* pp. 5.1-6 to 5.1-9; *Id.,* Appendix 5.1-A, pp. 3-7
[2263] *Id.,* Appendix 5.1-A, Figures 3 to 11
[2264] *Id.,* Appendix 5.1-A, p. 1
[2265] Ibid.

2001 through June 2002, Geocon also subcontracted with Earth Consultants International (ECI) to perform a site-specific fault study that included a series of fault trenches. ECI prepared a comprehensive report addressing the presence of faults, impacts associated with faulting, age dating of on-site sediments, and delineating recommended fault setbacks where appropriate.[2266] This study has been included in the Draft EIR as Appendix E to Draft EIR Appendix 5.1-A, and the results of the study have been incorporated into Draft EIR Section 5.1. The location of faults and setback zones associated with active faulting identified within the grading limits for the Project are presented in Figures 2 through 11 in Draft EIR Appendix 5.1-A, and collected in Draft EIR Exhibit 5.1-2.

Based on the above-described analysis, the Draft EIR and Geocon report conclude the following with regard to each type of surficial and geologic unit present on the Project site:

A. Previously placed fill: Isolated areas of previously placed fill exist throughout portions of the site, are generally uncompacted, and are of a limited extent and thickness.[2267] Deposits are not suitable in their present condition for support of additional fill and/or structural loading, and will therefore require removal and recompaction in areas of planned development.[2268]

B. Topsoil (unmapped): A relatively thin blanket of topsoil covers natural hillsides on the site.[2269] The soils are compressible and not suitable for loading, and will therefore require removal and recompaction within areas of planned grading.[2270]

C. Alluvium: The alluvium on site is in canyons and low-lying areas, varies in thickness from approximately 4 to 65 feet, and generally becomes denser with depth.[2271] The top 5 to 15 feet are generally loose and not suitable for loading, while below 15 feet, the alluvium has low compressibility potential and relatively minor volume change characteristics upon saturation, making it appropriate for loading.[2272] The upper 15 feet will therefore generally need to be removed and recompacted prior to placing fill; this is based on preliminary site study, and further subsurface information and laboratory testing will be needed to provide more refined remedial grading recommendations for each relevant portion of the Project site.[2273]

D. Colluvium: This type of soil is present under gently to moderately inclined slopes and semicircular bowl-shaped areas near the heads of arroyos and canyon drainages on the Project site; it varies in thickness from approximately 3 feet to 50+ feet, with an anticipated average thickness of 15 to 20 feet.[2274] Colluvium is poorly consolidated, porous, has low moisture content, and is subject to collapse upon wetting and settlement from loading, and therefore partial to complete removal and recompaction

[2266] Ibid.
[2267] *Id.,* p. 5.1-7; *Id.,* Appendix 5.1-A, p. 3
[2268] Ibid.
[2269] *Id.,* p. 5.1-7; *Id.,* Appendix 5.1-A, p. 4
[2270] Ibid.
[2271] Ibid.
[2272] Ibid.
[2273] Ibid.
[2274] *Ibid*.

will be required in areas of planned development.[2275] Additional subsurface information and laboratory testing will be needed to provide more refined remedial grading recommendations for each relevant portion of the Project site.[2276]

E. Landslide debris: A large, ancient landslide was encountered in the northwestern portion of the Oso Canyon area, covering approximately 1 mile in length, between 1,000 to 3,000 wide, and up to 200 feet thick.[2277] The landslide was mapped and partially delineated with exploratory trenches as well as a single, large-diameter boring.[2278] Previous mapping of the landslide suggests that its head was in granitic bedrock approximately 500 feet west of the Project site's western property line, and exploratory excavations and mapping indicate that the landslide failed within the adversely dipping claystones and shale of the Quail Lake Formation.[2279] The proposed Project entirely avoids this area, it is located within SEA No. 17, and it would be designated open space.[2280] Because there would be no development on or adjacent to this landslide, there would be no impact related to its presence.[2281] Another small, shallow landslide was mapped along a north-facing arroyo slope and several other small, shallow slumps and erosional sloughings were observed during on-site investigations along the more steeply eroded arroyos.[2282] The small landslide was mapped and partially delineated with exploratory trenches, and the others were not mapped because they do not exceed widths of 50 feet.[2283] Observations and exploratory excavations indicate these initially failed in permeable cohesionless gravelly sands of Older Alluvium.[2284] These landslides and small surficial slumps are not considered a potentially adverse impact, because they can be mitigated with standard remedial grading techniques, including removal and recompaction.[2285]

F. Older Alluvium: Older Aluvium terrace deposits cap the upper portions of mesas and ridges across the majority of the Project site and are one of the major deposits anticipated to be encountered during grading, at depths of approximately 8 to 74 feet.[2286] Except for surficial, weathered portions or thin interbedded clayey layers, the Older Alluvium displays high shear strength characteristics and low expansion potential, and given the in situ density of it, it is considered suitable for support of additional fill and/or structural loading.[2287] However, some localized layers consist of unconfined clean, gravelly sand that are subject to erosion and surficial landslides under heavy or perched groundwater conditions.[2288] Cohesionless zones encountered at finish grade may require undercutting and, if encountered in cut

2275 *Ibid*.
2276 *Id.,* Appendix 5.1-A, p. 4
2277 *Id.,* p. 5.1-7, Appendix 5.1-A, p. 5
2278 *Ibid*.
2279 *Id.,* p. 5.1-7
2280 *Ibid*.
2281 *Ibid*.
2282 *Id.,* p. 5.1-19
2283 *Id.,* p. 5.1-19; *Id.,* Appendix 5.1-A, p. 5
2284 *Ibid*.
2285 *Ibid*.
2286 *Id.,* page 5.1-8; Appendix 5.1-A, p. 5
2287 *Ibid*.
2288 *Ibid*.

slopes, may require slope stabilization to reduce the potential for slope erosion and shallow sloughage.[2289] When excavated and compacted, Older Alluvium should provide good capping material for lots and for outer slope zones of fill slopes.[2290]

G. Hungry Valley Formation: A relatively small exposure of the Hungry Valley Formation was encountered within the southwestern portion of the Project site. It has some bentonite clay seams, which can contribute to slope instability.[2291] However, the extent of it on the site is very small, and it is outside the development area of the Project, so there will be no impact.[2292]

H. Oso Canyon Formation: This formation was encountered at shallow depths in arroyos and lower slopes along the ridges and mesas in the southern and western portions of the site; it is expected to generate cut materials by proposed grading.[2293] Soil from this formation generally has very low expansion potential, high shear strength, and satisfactory foundation engineering characteristics in either a natural or properly compacted condition, and the formation on-site is considered suitable to support structural fill and/or loading in its present condition.[2294] Geotechnical investigations encountered strongly cemented zones up to 3 feet thick in this unit, and where encountered, excavations will likely require a very heavy effort with conventional heavy-duty grading equipment and/or localized breaking or possible blasting; Once ripped or broken up, large rock fragments will be generated that will require special placement procedures and compaction when placed in fills.[2295]

I. Quail Lake Formation: This formation is present in the western-most quadrant of the Project site, and several dipping bedding plane shears or remolded clay seams were encountered within large-diameter exploratory borings; these bedding plane shears are significant because they represent planes of weakness and when exposed in cut slopes can lead to slope instability.[2296] Some portions of the formation also have intersecting sets of clay-lined joints that could impact surficial slope stability.[2297] Expansion testing on the formation indicates a variable range of expansion indices from low to high, and highly expansive clay exposed at finish grade will require remedial grading to provide a select low expansive soil cap.[2298]

J. Neenach Volcanic Formation: A small exposure of this unit was mapped in the southeastern portion of the site.[2299] Additional subsurface work should be performed to evaluate the degree of weathering and rippability characteristics of this unit.[2300]

2289 *Id.,* Appendix 5.1-A, p. 5
2290 *Id.,* p. 6
2291 *Id.,* p. 5.1-8; *Id.,* Appendix 5.1-A, p. 6
2292 *Ibid*.
2293 *Ibid*.
2294 *Ibid*.
2295 *Ibid*.
2296 *Id.,* p. 5.1-9; *Id.,* Appendix 5.1-A, p. 6
2297 *Id.,* p. 5.1-9; *Id.,* Appendix 5.1-A, p. 7
2298 *Ibid*.
2299 *Id.,* p. 5.1-9
2300 *Id.,* Appendix 5.1-A, p. 7

Following this thorough analysis of site conditions and recommendations to ensure less than significant impacts, Geocon's report concludes that "Based on our study, we conclude that no soil or geologic conditions were encountered that would preclude development of the proposed grading and improvements provided the adverse geotechnical conditions identified herein are mitigated. Additional site-specific geotechnical studies should be performed during planning and/or preparation of tentative maps and grading plans".[2301] The information in the Geocon report appropriately documents the feasibility of site development and the geotechnical hazards that are present, as needed to evaluate the thresholds for geology and soils presented in Appendix G of the State CEQA Guidelines.

Coupled with the incorporation of the Geocon recommendations, discussion of the Project's required compliance with State and County requirements that would ensure the reduction of impacts to a less than significant level is an appropriate approach under CEQA. State and County requirements have been crafted over many years of experience in addressing geologic hazards and risk, and have been exhaustively updated based on past experience with seismic activity throughout California and in Los Angeles County. The Project will be subject to and comply with these exhaustive requirements. First, the Project is subject to the requirements of the Alquist-Priolo Act of 1972, which is "intended to provide policies and criteria to assist cities, counties, and state agencies in the exercise of their responsibility to prohibit the location of developments and structures for human occupancy across the trace of active faults" for any project located within a delineated earthquake fault zone.[2302] The Project must also be consistent with the Seismic Hazards Mapping Act[2303] of 1990, which directs the State Department of Conservation to identify and map areas subject to hazards in order to "assist cities and counties in fulfilling their responsibilities for protecting the public health and safety from the effects of strong ground shaking, liquefaction, landslides, or other ground failure and other seismic hazards caused by earthquakes."[2304] The proposed Project complies with the Alquist-Priolo Act of 1972 and the Seismic Hazards Mapping Act by preventing the construction of any structures used for human occupancy within designated Alquist-Priolo Earthquake Fault Zones and around the unnamed faults that were identified on the site as part of the Project's site-specific geotechnical investigations.[2305] Per PDF 5.1, the Project's Geologic Safety Zone would institute a minimum 100-foot setback (i.e., 100 feet in each direction) from the fault lines that traverse any development area; the width of the setback may potentially be reduced to 50 feet (in each direction), with the approval of the county, provided there is no evidence of fault activity from further trenching to be performed as part of an additional fault investigation during the site development process.[2306] The required setback and potential reduction to a distance of 50 feet is consistent with the requirements of the Alquist-Priolo Act, for which the setback is generally 50 feet.

The California Department of Education has also promulgated standards for school siting and construction in the California Code of Regulations[2307] with which the Project must

[2301] *Id.,* Appendix 5.1-A, p. 13
[2302] California Public Resources Code (PRC) § 2621.5(a),(b)
[2303] *Id.,* Chapter 7.8, §§ 2690-2699.6
[2304] PRC § 2692(a)
[2305] DRP 2017, pp. 5.1-13 and -14
[2306] *Id.,* p. 5.1-14
[2307] CCR, Title 5, Article 1

comply.[2308] These standards are implemented by individual school districts, and describe detailed procedures and requirements for school siting and land acquisition; development and approval of plans and specifications; and goals for the operation and maintenance of schools.[2309] Section 14004(f) of Title 5 requires that planned educational facilities are "designed to meet Federal, State and local statutory requirements for structure, fire, and public safety", and Section 14011(g) requires compliance with Section 17212 and 17212.5 of the California Education Code, which describe standards for the "geological and soils engineering studies" that are required before acquiring any school site and constructing any school building within the boundaries of any special studies zone or within an area designated as geologically hazardous in the safety element of the local general plan.[2310] The studies must be conducted by competent personnel and "shall be of a nature as will preclude siting of a school in any location where the geological and site characteristics are such that the construction effort required to make the school building safe for occupancy is economically unfeasible."[2311] The Department of General Services may also require similar studies for the construction or alteration of any school building on a site located outside of the boundaries of any special studies zone.[2312] Further, no school building shall be constructed, reconstructed, or relocated on the trace of a geological fault along which surface rupture can reasonably be expected to occur within the life of the school building.[2313] Mandatory Project compliance with these requirements will ensure that no schools would be inappropriately located, and impacts would be less than significant.[2314]

The County of Los Angeles Building Code (County Building Code) is promulgated under Title 26 of the Los Angeles County Code, and it incorporates and adopts by reference both the 2016 California Building Code and the 2015 International Building Code. The County Building Code contains extensive and specific requirements for construction in areas that present seismic risks, which would apply to the Project. With regard to hazard study and evaluation of a project's suitability for a site, County Building Code Chapter 1, Section 110.2, "Geotechnical Hazards", restricts building and grading activities in areas where geotechnical hazards of landslide, settlement, and slippage may be activated or increased as a result of project activities. The Project Applicant will be required to submit an Engineering Geology and/or Soils Engineering report to indicate how the hazard will be eliminated or mitigated prior to the use or occupancy of the relevant portions of the Project site.[2315] Per Chapter 1, Section 111, the reports must be prepared by a California-certified engineering geologist or California-licensed civil engineer, respectively, and must contain a finding regarding the safety of the site and the proposed work against a landslide, settlement, or slippage and a finding regarding the effect that the proposed work would have on the geotechnical stability of the area outside the proposed work.[2316] With regard to structural safety, County Building Code Chapter 16, Structural Design, describes requirements for construction of structures

[2308] DRP 2017, p. 5.1-4
[2309] *Ibid*.
[2310] *Ibid*; California Education Code § 17212
[2311] *Ibid*.
[2312] California Education Code § 17212.5
[2313] *Ibid*.
[2314] DRP 2017, pp. 5.1-16 and -17
[2315] *Id.,* p. 5.1-4
[2316] *Id.,* pp. 5.1-4 and -5

based on earthquake loads, including modifications to requirements defined in ASCE 71/2016 CBC Section 1613 related to Seismic Design Categories (formerly Seismic Zones) to reflect County conditions. The Seismic Design Categories consider building location, building use, and underlying soil conditions while Seismic Zones considered only building location. These County-specific building requirements are in addition to all other requirements of the 2016 California Building Code.[2317] County Building Code Chapter 17, Structural Tests and Special Inspections, requires an applicant to "submit a statement of special inspections prepared by the registered design professional in responsible charge in accordance with Section 106.4.2, as a condition for permit issuance" when specified seismic conditions are met. Section 1709 includes requirements for use of the registered design professional responsible for the structural design, or another registered design professional, to perform structural observations for those buildings included in particular Seismic Design Categories.[2318] Further, slope stabilization for the Project will comply with Title 26 of the Los Angeles County Building Code, Appendix Chapter 33, Excavation and Grading, and Appendix J, Section J110, Slope Planting and Erosion Control.

The Los Angeles County General Plan and the AVAP also include goals and policies that address geotechnical issues in the unincorporated County areas. Applicable AVAP policies PS 2.1 and 2.2 limit the amount of potential development in Seismic Zones and along the San Andreas Fault and other fault traces, and on steep slopes and landslide and liquefaction areas.[2319] Policy PS 2.3 prohibits the construction of new structures on or across a fault trace, and the intent of Policy PS 2.3 is to ensure that new development does not cause or contribute to slope instability.[2320] The Project is consistent with these AVAP policies because it incorporates a Geologic Safety Zone into the Project and will follow Project-specific plans, County building code requirements, and other recommendations.[2321] The majority of the Project site has slopes less than 25 percent (outside HMAs) and the areas with the greatest slopes would be preserved as open space, including the areas with potential landslide and liquefaction hazards in the northwestern corner of the site, as depicted in Draft EIR Exhibit 4-1, Centennial Project – Conceptual Land Use Plan.[2322] Project development would require grading of some sloped areas, as well as cutting and filling of some slope areas. Slopes would not be graded at angles steeper than a 2:1 ratio (horizontal to vertical), in accordance with the Project's Conceptual Grading Plan, County building code requirements, and other grading-related recommendations of the geotechnical reports to prepared for each tract map, and contained in the preliminary geotechnical report included in the Draft EIR as Appendix 5.1-A.

The First District Court of Appeal addressed appropriate reliance on compliance with regulatory requirements and the incorporation of suggested measures included in preliminary geotechnical investigations in *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884. In *Oakland Heritage Alliance*, a local organization ("the Alliance")

2317 *Id.,* p. 5.1-5
2318 *Ibid*.
2319 *Id.,* p. 5.1-6
2320 *Ibid*.
2321 *Id.,* p. 5.8-60
2322 *Id.,* p. 5.8-61

challenged an EIR prepared for the development of approximately 64 acres in Oakland, where the EIR identified potential seismic hazards because the site was in close proximity to the Hayward Fault Zone, San Andreas Fault Zone, and other faults capable of producing significant ground shaking at the project site.[2323] The trial court granted the Alliance's petition for writ of mandate, finding among other things that the original EIR's discussion of the project's seismic risks was inadequate, whereupon the City revised the EIR and certified it as revised.[2324] The City moved the trial court for an order discharging the writ and terminating the suspension of the project approvals, which the court granted, concluding that "the EIR as revised did not improperly defer mitigation of seismic effects, finding 'the statutory scheme described in the Revised EIR – designed to address the evaluation and mitigation earthquake-related impacts – does provide a sufficient standard of performance under CEQA. Further, the Revised EIR commits the city to mediation of seismic impacts by compliance with this statutory scheme (and other specified requirements stated in the mitigation measures), and thus the Revised EIR does not improperly defer mitigation in violation of CEQA." The court also found that substantial evidence supported the City's finding that the mitigation would reduce seismic impacts to a less than significant level."[2325]

The Alliance challenged the trial court's decision on appeal, but the First District upheld the order discharging the writ, explaining that a less than significant impact does not necessarily mean no impact at all, and that the Revised EIR appropriately concluded, after an extensive discussion of local and state requirements and a preliminary geotechnical report, that state and local code requirements would ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse resulting in a potential for injury or death.[2326] The court also held that the EIR appropriately noted that site-specific investigations would be required before final project design, and remedial methods adjusted as necessary, and that the standard engineering approaches, accepted by the geotechnical engineering community and implemented in communities all over California, that were preliminarily suggested in the EIR, provided substantial evidence that impacts would be reduced to a less than significant level.[2327] Further, the court held that there was no improperly deferred mitigation where the EIR and geotechnical investigation provided evidence that mitigation is feasible and discussed a range of mitigation strategies, all of which were standard, professionally accepted engineering practices, and where the EIR discussed required compliance with all geotechnical recommendations in future site-specific investigation reports and with described, mandatory state and local requirements.[2328] As the court concluded, "the Revised EIR proposes compliance with a regulatory scheme designed to ensure seismic safety. Although final design of the structures, including seismic safety design, is deferred until a later date, the Revised EIR gives adequate assurance that seismic

[2323] Oakland Heritage Alliance v. City of Oakland (2011) 195 Cal.App.4th at 888
[2324] *Id.,* at 887
[2325] *Id.,* at 895
[2326] *Id.,* at 899-900, 905
[2327] *Id.,* at 903-904
[2328] *Id.,* at 910-911

impacts will be mitigated through engineering methods known to be feasible and effective."[2329]

Analysis and discussion in the Draft EIR is consistent with the above-described approach upheld as appropriate under CEQA in *Oakland Heritage Alliance*. The Draft EIR appropriately concludes that compliance with statutes, regulations, and local ordinances, whose requirements are described above in this response, combined with implementation of recommended measures in the Geocon report and the future performance of further site-specific investigations to identify more specific site conditions and mitigation requirements, would ensure that impacts are less than significant under all geology and soil thresholds presented in Appendix G of the State CEQA Guidelines. This is standard practice and does not represent deferment of action with regard to geotechnical hazards on the site. Further, because adherence to statutes, regulations, and ordinances is already mandatory, incorporating them as mitigation measures is unnecessary and not required under CEQA. The approach taken in the Draft EIR analysis does not constitute a failure to evaluate potential impacts by merely promising compliance without meaningful analysis. Rather, this conclusion is appropriately based on expert documentation and interpretation of the facts regarding geologic conditions documented on the site and discussed above, expert understanding of the extent to which compliance with State and County requirements will mitigate impacts on the Project site, and expert assurance that seismic impacts will be mitigated through engineering methods known to be feasible and effective. The Draft EIR complies with CEQA requirements for geotechnical analysis, and no further analysis is required at this time.

Response to Comment F.8-209:

The Project has been designed such that it can accommodate sensitive land uses within its planned development area, including with regard to seismic hazards. First, Project development is concentrated away from environmentally sensitive areas. Project development entirely avoids major identified hazard areas including the ancient landslide in the northwest portion of the Project site and the Geologic Safety Zone established under PDF 1-1.[2330] Project areas with the greatest slopes are preserved as Open Space, including areas with potential landslide and liquefaction hazards as depicted in Draft EIR Exhibit 4-1, Centennial Project – Conceptual Land Use Plan.[2331] The Project has also been designed such that at least 50 percent of the development footprint is located on the flattest portions of the site (i.e., those areas having slopes of less than 25 percent) when that area does not contain rare, sensitive, or State or federally listed threatened or endangered species.[2332]

The Draft EIR also appropriately considers and discusses siting requirements for schools and other sensitive uses that would ensure impacts are less than significant. As discussed in the Draft EIR, the California Department of Education has promulgated standards for school siting and construction in the California Code of Regulations[2333] with which the Project must

[2329] *Id.,* at 912
[2330] DRP 2017, Exhibit 5.1-2 and p. 5.1-13
[2331] *Id.,* p. 5.8-61
[2332] *Id.,* Appendix 1-B of Appendix 4.0-A, p. 1
[2333] *CCR,* Title 5, Article 1

comply.[2334] These standards are implemented by individual school districts, and describe detailed procedures and requirements for school siting and land acquisition; development and approval of plans and specifications; and goals for the operation and maintenance of schools.[2335] Section 14004(f) of Title 5 requires that planned educational facilities are "designed to meet Federal, State and local statutory requirements for structure, fire, and public safety", and Section 14011(g) requires compliance with Section 17212 and 17212.5 of the California Education Code, which describe standards for the "geological and soils engineering studies" that are required before acquiring any school site and constructing any school building within the boundaries of any special studies zone or within an area designated as geologically hazardous in the safety element of the local general plan.[2336] The studies must be conducted by competent personnel and "shall be of a nature as will preclude siting of a school in any location where the geological and site characteristics are such that the construction effort required to make the school building safe for occupancy is economically unfeasible."[2337] The Department of General Services may also require similar studies for the construction or alteration of any school building on a site located outside of the boundaries of any special studies zone.[2338] Further, no school building shall be constructed, reconstructed, or relocated on the trace of a geological fault along which surface rupture can reasonably be expected to occur within the life of the school building.[2339] Hospitals are also required to reflect seismic safety concerns in their location decisions and building designs, pursuant to building code requirements.[2340] Mandatory Project compliance with these requirements will ensure that no schools or hospitals would be inappropriately located, and impacts would be less than significant.[2341] As discussed in response to Comment F.8-208, the analysis in Draft EIR Section 5.1 describes the additional geotechnical studies, and associated engineering measures to alleviate identified geotechnical conditions, that would be required pursuant to State and County codes. This is standard practice and does not represent deferment of action with regard to geotechnical hazards on the site. For further discussion, please also see response to Comment F.8-208.

Response to Comment F.8-210:

The potential for seismically-induced (i.e., earthquake-triggered) landslides is fully addressed in the *Preliminary Geologic Summary Report,*[2342] which was prepared by a California-Certified Engineering Geologist and a Registered Geotechnical Engineer, and was the basis for the analysis in Draft EIR Section 5.1. The report summarizes soil and geologic conditions within the Project site, presents compiled subsurface data from previous site-specific geotechnical studies, discusses site-specific geologic hazards, and provides recommendations for reducing impacts and for the preparation of future site-specific studies

2334 DRP 2017, p. 5.1-4
2335 *Ibid*.
2336 *Ibid*; California Education Code § 17212
2337 *Ibid*.
2338 California Education Code § 17212.5
2339 *Ibid*.
2340 DRP 2017, p. 5.1-16
2341 *Id.,* pp. 5.1-16, -17
2342 *Id.,* Appendix 5.1-A

during the preparation of tentative maps and grading plans.[2343] The report and Draft EIR conclusions regarding risk of landslides are based on expert interpretation of the facts regarding geologic conditions documented on the site.

As discussed in response to Comment F.8-208, the geologic units underlying the site, including their characteristics and constraints, including related to slope stability, are described in the Draft EIR. The Quail Lake Formation is identified in the geotechnical studies as having "dipping bedding plane shears". Bedding planes are the planes of division that separate successive layers of a stratified (i.e., layered) rock; dipping planes are tilted, or angled, relative to a horizontal ground surface; and shears are a type of rock deformation resulting from stresses that cause the portion of a rock body on one side of a plane to slide past the portion of the opposite side. As disclosed in the Draft EIR, these bedding plane shears are significant because they represent planes of weakness and when exposed in cut slopes can lead to slope instability.[2344] Also, the Draft EIR discloses that the large landslide in the northwest portion of the Project site failed within the adversely dipping claystones and shale of the Quail Lake Formation.[2345] To be "adversely" dipping refers to the angle of a geologic unit being in the opposite direction, such as to a slope (either engineered or natural) or movement of a landslide. The dips of existing geologic units, and whether there are shears and/or clay layers/joints in the units, are the types of observations made by geologists precisely because they can affect slope stability in the absence of appropriate engineering measures. These are not unusual characteristics of geologic units, nor do they represent characteristics that prevent land use development. This is supported by the conclusion of Geocon's report that "Based on our study, we conclude that no soil or geologic conditions were encountered that would preclude development of the proposed grading and improvements provided the adverse geotechnical conditions identified herein are mitigated. Additional site-specific geotechnical studies should be performed during planning and/or preparation of tentative maps and grading plans".[2346]

With regard to the large, ancient landslide identified in the northwest portion of the Project site, the Commenter is correct that the greatest slopes would be preserved as open space, including the areas with potential landslide and liquefaction hazards in the northwestern corner of the site, as depicted in Draft EIR Exhibit 4-1, Centennial Project – Conceptual Land Use Plan.[2347] The statement that evidence of the ancient landslide indicates susceptibility to similar events in the Project area is an unsubstantiated opinion that is not based on facts or reasonable assumptions. As stated in Section 21082.2(a) of the *Public Resources Code*, the determination of a significant environmental impact shall be based on "substantial evidence in light of the whole record". Section 21082.2(c) states that "Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous…is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." The Draft EIR, including the geotechnical report and its appendices, therefore rely on substantial evidence

[2343] *Id.,* p. 1-14
[2344] *Id.,* p. 5.1-9; *Id.,* Appendix 5.1-A, p. 6
[2345] *Id.,* p. 5.1-7
[2346] *Id.,* Appendix 5.1-A, p. 13
[2347] *Id.,* p. 5.8-61

demonstrating that the ancient landslide bears no relation to the potential for "similar large landsliding events" in the remainder of the Project area.

Response to Comment F.8-211:

With regard to on-site risks from the steeper topography in the western portion of the Project site and the steep arroyos, such risk was thoroughly evaluated and addressed in the Draft EIR. First, geological conditions in the applicable areas were studied. Large diameter borings were performed in proposed cut slopes to characterize structural or lithologic features that could potentially impact slope-stability.[2348] The Project has been designed to be consistent with AVAP Policy PS 2.2, which is to "Limit the amount of development on steeps slopes (Hillside Management Areas) and within landslide and liquefaction areas…" As discussed in the Draft EIR, the majority of the Project site has slopes less than 25 percent and is therefore outside of a Hillside Management Area. The Specific Plan includes Figure 3-19, Preliminary Slope Analysis, which indicates that the majority of the Project's development area has slopes less than 15 percent or 25 percent.[2349] This is because the Project has been designed such that the areas with the greatest slopes would be preserved as open space, including the areas with potential landslide and liquefaction hazards in the northwestern corner of the site, as depicted in Draft EIR Exhibit 4-1, Centennial Project – Conceptual Land Use Plan.[2350]

Based on the preliminary slope analysis, approximately 26 percent of slopes greater than 25 percent will be affected by grading and many of those slope areas are small and isolated.[2351] To ensure that these steeply sloped areas within the Project's development area would have stable slopes and building pads at buildout, future subdivision maps will define the precise scope of grading for each development phase in the Project site, and such maps will be consistent with the intent, goals, and guidelines provided in the Centennial Specific Plan's Hillside Design Guidelines, included in the Draft EIR as Appendix 1-B to the Specific Plan, which is Draft EIR Appendix 4.0-A. Areas that will graded for development have been identified on the Conceptual Grading Plan shown at Specific Plan Figure 3-20 – it depicts the general grading approach for the topography of the Project site and has been designed to eliminate the potential safety threat posed by development in areas with steep slopes.[2352] A more precise analysis of slopes for each relevant area will be prepared with each tract map submittal. Slope stabilization shall also conform to Title 26 of the Los Angeles County Building Code, Appendix Chapter 33, Excavation and Grading and Appendix J, Section 110, Slope Planting and Erosion Control.[2353] Project construction will also comply with a wide range of local and state requirements, suggestions in the Project preliminary geotechnical report, and suggestions in future, more specific geotechnical report to ensure that impacts are less than significant, as more thoroughly discussed in response to Comment F.8-208.

[2348] *Id.,* Appendix 5.1-A, p. 1
[2349] *Id.,* Appendix 4.0-A, p. 3-17
[2350] *Id.,* p. 5.8-61
[2351] *Id.,* Appendix 4.0-A, p. 3-26
[2352] *Ibid*.
[2353] *Ibid*.

With regard to the documentation regarding the landslides triggered by the 1994 Northridge earthquake, those events bear no relation to risk on the Project site because the Northridge area (i.e., the earthquake epicenter) is situated approximately 50 miles to the south of the Project site and has a different geotechnical context. Specifically, the risk of landslides is based on both (1) topography and native geologic conditions and (2) engineered treatments of developed areas. Existing topography and geologic conditions on the Project, as they relate to landslide risk is fully addressed in the geotechnical studies of the site and disclosed in the Draft EIR, as discussed in the paragraphs above.

The referenced U.S. Geological Survey (USGS) study by Harp and Jibson states in its abstract that the 11,000 earthquakes cited in this comment occurred over an area of "about 10,000 km^2", or approximately 3,861 mi^2. For context, the County of Los Angeles is 4,751 mi^2, meaning the area of the USGS study encompassed an area equivalent to over 80 percent of the County. In the event of a strong (magnitude [M]6-6.9) or major (M 7-7.9) earthquake on any of the regional active faults in southern California, such as the M6.7 Northridge earthquake in 1994, widespread damage and even fatalities over a very large area would be anticipated. This is in part due to the varying levels of earthquake-resistant engineering and construction techniques present in the structures of any existing, large, metropolitan area in southern California, as well as the highly varied topography and underlying geologic conditions. The Draft EIR does not purport there would be no damage to the proposed Centennial Project in the event of an earthquake. The Draft EIR asserts it is feasible to design and construct the proposed uses on the Project site, consistent with State and local code requirements, such that although there may be damage to structures there would be a less than significant impact related to the potential for injury and death due to this damage, including reducing the risk of collapse. This conclusion is based on substantial evidence in the record, and expert opinion based on this evidence.

The USGS study abstract also states that "most of the landslides were concentrated in a 1,000-km^2 area that includes the Santa Susana Mountains and the mountains north of the Santa Clara River valley." Further, the study states "Most of the triggered landslides were shallow (1-5 m)…". In other words, most of the landslides were within an area occupying 10 percent of the area reviewed, this area included mountainous regions, and that most landslides were shallow. These statements correlate with the risk of landslides being highly correlated with topography; in a mountainous area there are steep slopes and these slopes are in a natural condition, as such there is a high risk of seismically-induced landslides compared to an area with rolling or relatively level topography and/or areas with engineered slopes. The Project's development footprint does not include steep slopes such as would be found in mountainous areas; further, the development footprint would include engineered slopes of less than a 2:1 ratio, which must be proven to be adequately stable in the supporting geotechnical studies required by State and local codes. For all of these reasons, referencing the number of landslides in an area almost the size of Los Angeles County, with highly varied topography and both developed and undeveloped areas, with the seismic risk on the Project site is a false equivalency and is not substantiated with facts.

With regard to the potential risk on the Project site because of its location within 25 miles of 8 dominant faults, as discussed in response to Comment F.8-207, because of the extremely

high seismicity throughout Southern California, the nearness of one or more active faults does not have a direct correlation to more or less risk of a seismic event and the magnitude of the event in a certain area.

The Draft EIR has adequately evaluated the risk posed by potential earthquake-triggered landslides. This comment does not represent expert opinion or other facts that supplant the findings of site-specific geotechnical studies. The potential for seismically-induced (i.e., earthquake-triggered) landslides is fully addressed in Draft EIR Appendix 5.1-A, which was prepared by a California-Certified Engineering Geologist and a Registered Geotechnical Engineer, and was the basis for the analysis in Draft EIR Section 5.1. Please also refer to response to Comment F.8-210.

Response to Comment F.8-212:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment expresses an opinion about and does not address or question the content of the Draft EIR, and no further response is required. The following information summarizes the analysis of water supplies in the Draft EIR.

The Project's water supplies are discussed in Section 5.18, Water Resources. As discussed on Draft EIR pages 5.18-2 and 5.18-51 to 5.18-67, and as summarized in Tables 5.18-10 to 5.18-12 for normal or average, single-dry, and multiple-dry years, the Project will utilize several water supplies and on- and off-site water banking facilities to meet potable demand. Available supplies include groundwater and imported water return flows in accordance with the approved Antelope Valley Basin Adjudication Judgment and Physical Solution; State Water Project (SWP) supplies secured for Project use and imported to the site under an agreement with the Antelope Valley – East Kern Water Agency (AVEK); and AVEK service area deliveries. Indoor wastewater will be conveyed to one of two Project on-site treatment facilities; will be treated to State unrestricted reuse standards; and will be distributed to meet approximately 40 percent of buildout water demand. The Project's water supplies will sustainably meet buildout potable and recycled water demands and will maintain an average annual reserve supply of more than 79,000 acre-feet, or more than 11 years of full-buildout potable water demand, after buildout has been achieved. The analysis of the Project's water supplies is consistent with and based on the most current projections prepared by state and regional public agencies with specific expertise and responsibility for analyzing water supplies, including imported and ground water, under applicable laws, regulations and policies. The Project's use of recycled water is consistent with state and regional policies, rules and regulations that encourage the use of recycled water to reduce demand for potable water supplies.

As discussed on pages 5.18-27 to 5.18-28, and as shown in Draft EIR Appendix 5.18-C, the analysis of the project's imported water supplies is based on the most current State Water Project Delivery Capability Report (DCR) prepared by the California Department of Water Resources (DWR), the state agency that owns and operates the State Water Project (SWP). As stated in the DCR, since 2003 the DWR has been legally obligated to "prepare and deliver

to all State Water Project (SWP) contractors, all city and county planning departments, and all regional and metropolitan planning departments within the project service area a report which accurately sets forth, under a range of hydrologic conditions, the then existing overall delivery capability of the project facilities and the allocation of that capacity to each contractor." As discussed in Draft EIR Section 5.18, the Project analysis uses the more conservative Early Long Term (ELT) delivery reliability scenario in the DCR rather than the DCR base scenario, because the ELT scenario incorporates much more significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise.

The analysis of project imported water supplies is also consistent with and based on the analysis prepared by AVEK in the agency's current Urban Water Management Plan[2354] prepared and adopted in accordance with California Water Code Section 10610 et seq. (the "Urban Water Management Planning Act"). The UWMP was approved by AVEK in 2016 and was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. AVEK is one of 29 SWP contractors in California, is the largest SWP water importer in the Antelope Valley basin and will import all of the SWP system supplies that the Project will use. As discussed on Draft EIR page 5.18-24, the UWMP includes the projected delivery of 4,000 acre-feet per year (afy) of SWP water to the Tejon Ranch Company, all of which will be used for the Project. In addition, as discussed on Draft EIR pages 5.18-62 and 5.18-63, AVEK will also import SWP water transferred from the Tulare Lake Basin Water Storage District (1,451 afy) and the Dudley Ridge Water District (1,993 afy) to the Tejon Ranch Company. The transfer agreements are included in Appendices L and K of Draft EIR Appendix 5.18-A, and the agreement with AVEK to import the transferred water supplies is included in Draft EIR Appendix 5.18-E. The projected water deliveries to the Tejon Ranch Company in the UWMP and the SWP transfer water imported by agreement with AVEK are analyzed by using the same methodology in the AVEK UWMP for SWP delivery reliability. The UWMP utilizes the current DCR, which the UWMP states is a "biennial report to assist SWP contractors and local planners in assessing the near and long-term availability of supplies from the SWP [and] provides SWP supply estimates for SWP contractors to use in their planning efforts".[2355] The AVEK UWMP considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2356] In addition, the UWMP used a single dry year SWP allocation level of 5 percent, lower than used in the DCR ELT analysis, to reflect the historically low allocation in 2014. The UWMP analyzed multiple drought year water supplies based on the ELT projections for 1990 to 1992 of 12, 16, and 24 percent of AVEK's Table A amounts, which the UWMP states is the "worst case" 3-year period in the ELT scenario, and which results in an average annual delivery of 17 percent of AVEK's contracted SWP amounts during the drought period. The lowest Table A deliveries of water from the SWP during the most recent drought period, (2013 to 2015) were 35 percent, 5 percent, and 20 percent respectively,

2354 DRP 2017, Appendix 5.18-F
2355 *Id.,* Appendix 5.18-F, p. 6-1
2356 *Ibid*.

which results in an average of 20 percent. The ELT scenario considered in the UWMP uses an average delivery level that is lower than the lowest average 3-year delivery level that occurred during the most recent California drought even with the historically low delivery of 5 percent of SWP contract amounts in 2014. The Project water supply analysis incorporates the lower single-dry year delivery level and the 1990 to 1992 drought period delivery levels used in the AVEK UWMP and is more conservative than the DCR ELT scenario.

In January 2017, at the request of the County, Kennedy-Jenks, a leading California water engineering company, provided a peer review report of the Project's water supply and demand analysis.[2357] The report concluded that the Draft EIR "correctly uses the ELT scenario to estimate future SWP supply availability from AVEK because it is based on existing facilities and regulatory constraints, with hydrology adjusted for the expected effects of climate change." The report also recommended that to be consistent with the AVEK UWMP, the Project analysis include a single dry year SWP amount of 5 percent, which was implemented for the Project analysis.[2358]

All Project use of groundwater, imported water return flow production, and water banking will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution.[2359] The Adjudication Judgment and Physical Solution was approved by the California Superior Court in December 2015 to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution represents the best available information about and the legal framework governing the avoidance of potential long-term, cumulative impacts to the Antelope Valley Basin. Section 1.5 of the Adjudication Judgment and Physical Solution states that after the Phase 3 trial of the proceedings, the Court determined that the safe yield of the Antelope Valley Basin is 110,000 acre-feet per year. Section 3.5.43 of the Adjudication Judgment and Physical Solution defines safe yield to mean the amount of annual extractions of water from the Basin over time equal to the amount of water needed to recharge the groundwater aquifer and maintain it in equilibrium, plus any temporary surplus. Section 3.4 of the Adjudication Judgment and Physical Solution states that the physical solution governs groundwater, imported water and Antelope Valley Basin storage space to ensure that the Antelope Valley Basin supports existing and future reasonable and beneficial uses. Exhibit 4 to the Adjudication Judgment and Physical Solution allocates overlying production rights in amounts consistent with the Basin's sustainable yield and provides that, after a 7-year rampdown period applicable to all basin groundwater users, the Tejon Ranch Company has an overlying production right of 1,634-acre feet per year, all of which will be provided to and utilized by the Project. The groundwater component of the Project's water supplies discussed in the Draft EIR is limited to the post-rampdown amount of the overlying production right of 1,634-acre feet per year allocated to Tejon Ranch Company in the Adjudication Judgment and Physical Solution. The volume of imported water return flows that will be used by the Project is derived directly from the Adjudication Judgment and Physical Solution, which provides that imported water used to meet urban demand in the Antelope Valley Basin may be recovered by the importing party in an amount equal to 39

[2357] *Id.,* Appendix 5.18-G
[2358] *Id.,* Appendix 5.18-G, p. 18
[2359] *Id.,* Appendix 5.18-D

percent of the average imported water use over the prior 5 years. As discussed on Draft EIR page 5.18-64, the analysis of return flow supplies in the Draft EIR is conservative because the Adjudication Judgment and Physical Solution allows for the additional production of return flows generated by urban imported water use in the Antelope Valley watershed as well as in the Basin with Watermaster approval. The Project water supplies discussed in the Draft EIR do not include potential return flows supplies for watershed urban use because these have not yet been approved by the Watermaster. The Adjudication Judgment and Physical Solution includes the continued operation of the existing water bank operated by the Tejon Ranch Company and Tejon RanchCorp, and the proposed onsite water bank will be operated in accordance with the Adjudication Judgment and Physical Solution with the approval of the Watermaster.[2360]

The fact that the Adjudication Judgment and Physical Solution, including the annual groundwater allocation to the Tejon Ranch Company, takes account of and avoids potential long-term and cumulative impacts to the Antelope Valley Basin is recognized in the 2014 California Sustainable Groundwater Management Act, which requires, for the first time in state history, that certain medium and high priority groundwater basins implement a plan to sustainably manage groundwater over time. Section 10720.8(b) of the Act specifically exempts the Antelope Valley from these requirements upon the approval of the Adjudication Judgment and Physical Solution. Section 10720.8 also exempts other adjudicated basins throughout the state. These exemptions demonstrate that an adjudication judgment, including the Antelope Valley Basin Adjudication Judgment and Physical Solution, accounts for and allocates water uses, avoids groundwater impacts, including long term, cumulative impacts, and ensures that groundwater use will be sustainable over time.

The Project water supply analysis is also consistent with the analysis methodologies used in the current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site. Although the Project is not within the service area of and will not receive any water from the County Waterworks District 40, the District has the responsibility and expertise for projecting the reliability of Antelope Valley water supplies, and the District's analysis of these supplies uses substantially the same methodology as the Project analysis. The District's UWMP includes: (a) SWP imports based on the AVEK UWMP reliability factors discussed above; (b) groundwater use and imported water return flows allocated to the District under the Adjudication Judgment and Physical Solution; and (c) extensive use of water banking, including dry year recoveries from District water banked in wetter years ranging from 25,300 to 70,525 acre afy in drier years. Based on these supplies, the Los Angeles County Waterworks District 40 UWMP concludes that District has adequate water supplies to meet projected demands in all types of water years, including normal or average, single-dry, and multiple-dry year droughts.[2361]

2360 *Id.,* pp. 5.18-52 and -53

2361 County of Los Angeles Department of Public Works (DPW). 2017 (February 2). Final 2015 Urban Water Management Plan for District 40 (p. ES-3). Alhambra, CA: DPW. https://dpw.lacounty.gov/wwd/web/Documents/2015%20Integrated%20Urban%20Water%20Management%20Plan%20for%20the%20Antelope%20Valley.pdf.

Long-term, cumulative regional water supplies are discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single dry and multiple dry years, and taking account of potential climate change impacts, prepared by the California Department of Water Resources in the State Water Project Delivery Capability Report.[2362] As discussed in Draft EIR Sections 5.18 and 7.0, the Antelope Valley Area Plan and General Plan EIRs, prepared by the County, the EIRs concluded that current water supplies within the Antelope Valley would be sufficient to meet demand up to 2035 during average water years. The EIRs further noted that available water plans and projections, including the 2013 Antelope Valley Integrated Regional Water Management Plan, indicated that current supplies would not sufficient to meet dry and multiple-dry year demand by 2035. The EIRs found that while potential buildout of the Antelope Valley Area Plan and General Plan in the Antelope Valley region after 2035 could further increase regional water demand, there were no water supply projections extending after 2035. Consequently, the EIRs found that cumulative impacts to regional water supplies would be significant and unavoidable because of the lack of projections for analyzing regional water supply sufficiency after 2035. The Draft EIR determined that the Project would help to reduce the water supply cumulative impact identified in the Antelope Valley Area Plan and General Plan EIRs because it would achieve water use efficiencies above existing average rates in the region and would ensure that the Project-related increment of future regional growth considered in the Antelope Valley Area Plan and General Plan EIRs would occur with a high level of water conservation, including state-of-the art household and irrigation installations and significantly enhanced recycled water use. Nevertheless, consistent with the Antelope Valley Area Plan and General Plan EIRs, the Draft EIR determined that potential cumulative water supply impacts would be significant and unavoidable.

As discussed on Draft EIR page 5.18-67, at buildout, approximately 4,577 afy of recycled water will be used to meet 40 percent of total Project water demand. This level of recycled water use is significantly above the average and per capita recycled water use in the Antelope Valley and furthers the objectives of the State of California in substituting recycled water for potable water throughout the state. As discussed on Draft EIR page 5.18-12, the California recycled water use policy adopted in 2009 by the State Water Resources Control Board (SWRCB) (Resolution No. 2009-0011) states that, "In the face of an unprecedented water crisis due to the collapse of the Bay-Delta ecosystem, climate change, continuing population growth combined with a severe drought on the Colorado River and failing levees in the Delta, the SWRCB has adopted a Recycled Water Policy in an effort to move aggressively towards a sustainable water future" by declaring "our independence from relying on the vagaries of annual precipitation and move towards sustainable management of surface waters and groundwater, together with enhanced water conservation, water reuse and the use of stormwater." The Project's proposed recycled water use is consistent with the state Recycled Water Policy and results in the significant use of recycled water generated from onsite

[2362] DRP 2017, Appendix 5.18-C

wastewater reclamation facilities (WRFs) and treated to California Code of Regulations Title 22 unrestricted reuse standards. Potential impacts from the operation of the WRFs are discussed in Draft EIR Sections 5.18 and 5.19 and on Draft EIR pages 5.4-73 and 5.4-74. The WRFs must comply with Title 22 of the *California Code of Regulations,* the California Porter-Cologne Act, and the Lahontan Basin Plan's surface and groundwater quality objectives. Waste Discharge Requirements (WDRs) issued by the Lahontan Regional Water Quality Control Board will require the Project to include design features, such as berms, levees, spill containment features, and other topographical elevation features, to protect the WRFs during large flood events and to protect adjacent properties under any emergency conditions. As shown on Exhibit 4-14 in the Draft EIR, there are no sewer pipelines or force mainlines that would cross over the State Water Project (SWP) Aqueduct; therefore, there is no risk of sewer line rupture over the SWP Aqueduct. As requested by the Lahontan Regional Water Quality Control Board, response to Comment D.3-14 addresses the Antelope Valley Salt and Nutrient Plan adopted in conformance with the state Recycled Water Policy. In response to Comment D.3-14, the following text has been added after the fourth paragraph on page 5.4-70 of the Draft EIR:

> A Salt and Nutrient Management Plan (SNMP) was developed for the Antelope Valley Groundwater Basin in May 2014. The baseline water quality analyses for the Antelope Valley Groundwater Basin included in the SNMP indicates that overall groundwater quality with respect to the SNMP constituents of concern is below the SNMP water quality management goals. These goals are consistent with the Regional Board's Basin Plan to protect the beneficial uses of the water. The analysis of future water quality (through 2035) indicates slowly increasing trends in the overall basin groundwater salt and nutrient quality that will remain below the SNMP water quality management goals. Therefore, no new implementation measures as part of the SNMP process are recommended at this time. Nevertheless, existing measures or practices are already in place to manage water quality, and frequent monitoring is recommended to assess trends in water quality.
>
> The SNMP developed for the Antelope Valley Groundwater Basin in May 2014 proposes a monitoring plan to track the water quality in the basin. Results will be used to determine whether the concentrations of salt and nutrients over time are consistent with the SNMP predictions and the applicable SNMP water quality management goals. The monitoring program includes 32 municipal water supply wells that are currently monitored by the California Department of Public Health. The results from these existing monitoring programs will be downloaded from the State Board's Geotracker Groundwater Ambient Monitoring and Assessment (GAMA) database and included in the monitoring report prepared by the SNMP stakeholders or the appointed Antelope Valley Groundwater Basin Watermaster, if applicable. Imported, recycled, and treated potable water supply to the region will also be monitored and results included in the report. The Project must comply with all applicable requirements of the SNMP, including the identification or installation of appropriate groundwater monitoring wells in consultation with the SNMP

stakeholders or the appointed Antelope Valley Groundwater Basin Watermaster, if applicable, to supplement the Antelope Valley SNMP monitoring program as necessary to implement the SNMP monitoring program in the Project area.

Salt and nutrient management implementation measures that are incorporated into the Project include:

- Municipal wastewater management. The proposed wastewater reclamation facilities (WRFs) s will incorporate tertiary treatment processes that include nitrification-denitrification treatment processes to control nitrate concentration in the effluent and recycled water. The WRFs will use ultraviolet light (UV) disinfection to reduce chloride concentrations as opposed to chlorination disinfection processes, consistent with the Lahontan RWQCB and Title 22 requirements (see MM 19-2).

- Industrial waste management. The WRFs will implement industrial waste management measures (i.e., pretreatment program, educational outreach, and coordination with customers).

- Recycled water irrigation management. The implementation of recycled water is regulated by the Title 22 California Code of Regulations. Numerous BMPs and operating procedures will be followed when using recycled water for irrigation as required by Regional Board permits. These BMPs and operating procedures include water quality monitoring at the treatment plant; applying irrigation water at a rate that does not exceed the demand of the plants, with respect to water and nutrients; a site supervisor will be responsible for regulatory and permit compliance at all times; irrigation will not be allowed to occur at any time when unauthorized runoff may occur, such as during times of rainfall or very low evapotranspiration, and any excessive overspray must be controlled.

- Low impact development techniques. As stormwater has low to no concentrations of salt and nutrients, the Project incorporates low impact development stormwater management techniques that promote groundwater recharge (see MM 4-1).

- Landscaping BMPs to limit nutrients in runoff. The Project will implement integrated pest management (IPM) and landscaping BMPs consistent with the integrated pest management and pesticide and fertilizer application guidelines established by the University of California Division of Agriculture and Natural Resources Statewide Integrated Pest Management Program. The IPM and landscaping BMPs will be confirmed in a Landscaping Plan submitted to the County during

the review and approval process for each tract map application (see MM 4-2).

Results of the monitoring will be used to determine whether additional implementation measures are necessary to maintain the SNMP water quality management goals. Monitoring report results that indicate ambient groundwater quality exceeding 50 percent of the baseline assimilative capacity or significant increases may require additional modeling and/or evaluation to determine what mitigation action, if any, is necessary and appropriate. Such measures, which would be implemented by appropriate regional authorities in conjunction with the SNMP, may include:

- Reducing the amount of salts added to groundwater via source water – modified wastewater treatment processes such as increased retention time or blending prior to use for irrigation.

- Reducing the amount of salts and nutrients added to water via anthropogenic sources – BMPs, public outreach, and land management guidelines.

- An ordinance or ban on water softeners that uses salts may result in reduced chloride and slightly reduced TDS concentrations in the wastewater and ultimately reduced concentrations in the recycled water produced.

Consequently, the Draft EIR utilizes the most current and best available information about all of the Project's water supplies and considers all applicable impacts from the proposed use of SWP imports, groundwater, return flows, banked water, and recycled water. The analysis is based on the most current DWR DCR, the current AVEK UWMP, the Antelope Valley Adjudication Judgment and Physical Solution entered by the Court in December 2015, and the state of California and Lahontan Regional Water Quality Control Board recycled water use policies and requirements. The analysis has been peer reviewed by one of the leading California engineering firm and all applicable recommendations in the peer review have been implemented.[2363] Cumulative impacts have been evaluated based on applicable plans and policies for the Antelope Valley as well as the AVEK UWMP and the Antelope Valley Basin Adjudication Judgment and Physical Solution.

The Draft EIR includes mandatory and enforceable water conservation, monitoring and adaptive management measures. MM 18-1 requires the following water efficiency and conservation measures, all of which will be incorporated into the Mitigation Monitoring and Reporting Plan (MMRP) for the Project adopted and enforced by the County as required by CEQA:

1. The Project Applicant/Developer must comply with the water efficiency and conservation measures set forth in Divisions 4.3 and 5.3 of the California Green

[2363] DRP 2017, Appendix 5.19-A

Building Standards (CALGreen) Code or the County Green Building Standards Code, whichever are more stringent.

2. The Project Applicant/Developer must install, maintain, and monitor all non-construction potable and non-potable water use using appropriate metering equipment throughout the site.

3. The Project Applicant/Developer must install, maintain, and operate on-site wastewater treatment and conveyance facilities that provide recycled water treated to California Title 22 unrestricted reuse standards from on-site wastewater and use recycled water to meet (i) 100 percent of commercial, business park, institutional, school, hotel, park, and slope irrigation demand and (ii) outdoor irrigation demand in 50 percent of the total very low and low density residential lot landscaped area.

4. The Project Applicant/Developer must require installation of water-efficient major appliances (washers, dryers, dishwashers) in compliance with the California Appliance Efficiency Regulations, Energy Star, or other applicable standards.

5. The Project Applicant/Developer must require the installation of irrigation equipment with a minimum 0.80 irrigation efficiency for all public and private park, recreation and entertainment land use, arterial roadway, and slope irrigation uses, the use of Water Smart/Evapotranspiration-based controllers, and the use of low water use plants and shrubs in all irrigated slope areas with an average plant factor of 0.2, as defined in the State Model Water Efficient Landscape Ordinance.

6. The Project Applicant/Developer must require that the Project Water Purveyor implement water budget based rates in compliance with all applicable legal requirements and in a manner consistent with the use of such rates by other water districts in California (e.g., Irvine Ranch Water District) to ensure that Project potable water use meets or exceeds the following standards and adjusted as may be required to meet more stringent standards that may be adopted by the State or Los Angeles County: (a) Residential indoor water use – 55 gallons per capita per day; (b) Commercial indoor water use – 200 gallons per day per thousand square feet; (c) Business Park indoor water use – 65 gallons per day per thousand square feet, including recycled water for commercial wastewater and cooling use except where prohibited by applicable law for particular types of areas or uses (e.g., employee cafeterias); (d) Institutional indoor water use – 50 gallons per day per thousand square feet; (e) Hotel indoor water use – 125 gallons per day per room; (f) Residential outdoor water use – 55 percent of the reference evapotranspiration rate for the Project site ; and (g) Commercial, industrial, and institutional outdoor use – 45 percent of the reference evapotranspiration rate for the Project site.

As discussed in Draft EIR Section 5.18, the analysis of Project water supplies, even assuming demand above the levels in MM 18-1, such as indoor residential water use of 65 gallons per capita per day instead of 55 gallons per capita per day (the current state consumption target), shows that the Project's water supplies will sustainably meet post-buildout demand

and maintain an average banked supply of 79,000 acre-feet over time. To provide an additional level of assurance that Project supplies will meet demand, MM 18-2 requires implementation of water use monitoring and reporting, including the submission of water use reports to the County at the end of the 5th and 10th years or the occupancy of the 4,000th and 10,000th units, whichever occurs latest, to confirm that the water use efficiencies discussed in the Draft EIR are being achieved as the Project is built and that available water supplies are sufficient to meet future demand. This additional analysis must occur at Project development milestones that are approximately 25 and 50 percent of buildout levels. If a report determines that water use is exceeding projected levels, the Project Water Purveyor must identify specific response measures to ensure that water supplies will meet future demand. Potential sources of additional supply, if necessary, are discussed on pages 5.18-69 to 5.18-72 of the Draft EIR and include potential groundwater transfers as allowed by the Adjudication Judgment and Physical Solution, supplemental surface water purchases and imports, and investments in additional recycled water use or storm water reuse in the Antelope Valley. No additional development will occur until sufficient supplies are identified for the project. MM 18-2 will be incorporated into the MMRP for the Project adopted and enforced by the County as required by CEQA.

As a result, the Project's analysis of water supplies takes account of all applicable impacts, and significant, enforceable water conservation, monitoring and adaptive management mitigation measures have been implemented, including comprehensive water use and availability reports at conservative Project buildout milestones, to ensure that projected water supplies and demand levels are being achieved before any additional construction can occur.

Response to Comment F.8-213:

This comment inaccurately describes the analysis methodology used to analyze Project water supplies, incorrectly identifies the drought period used in the analysis, does not reference the current Antelope Valley-East Kern Water Agency (AVEK) Urban Water Management Plan (UWMP) used in the Draft EIR water supply analysis, and fails to acknowledge the extensive and sophisticated analysis of potential climate change impacts that have been incorporated into the projections used in the AVEK UWMP and in the Project water supply analysis.

As discussed on Draft EIR pages 5.18-2 to 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water Code by the Golden Valley Municipal Water District (GVMWD) in May 2011.[2364] In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan[2365] for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. In 2014 and 2015, the County of Los Angeles Board of Supervisors published the draft and certified Final Environmental Impact Reports (EIRs) for updates to the Antelope Valley Area Plan (AVAP) and to the County General Plan (General Plan Update) and approved the updated AVAP and General Plan Update. The approved General Plan Update incorporated the

[2364] DRP 2017, Appendix 5.18-A
[2365] *Ibid.*

previously approved AVAP update, which reduced the level of future growth in unincorporated portions of the Antelope Valley from levels that would have occurred under prior General Plan designations. Antelope Valley regional water supplies and demands were considered in the EIRs prepared for the AVAP and General Plan Updates. In 2013, a regional water users group in the Antelope Valley prepared an update to the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) in accordance with State law. In December 2015, the Superior Court of California approved an Adjudication Judgment and Physical Solution that regulates the Antelope Valley groundwater basin. In June 2016, AVEK adopted its current UWMP, and in June 2015, the California Department of Water Resources (DWR) published the current State Water Project (SWP) Delivery Capability Report (DCR), which includes the most recent analysis of SWP current and future reliability. From 2014 to 2016, the Governor of California, other State agencies, and the California legislature implemented several water conservation and management measures in response to a historic drought. A public review draft of proposed permanent state water conservation measures was published by five state agencies in November 2016. As stated on Draft EIR page 5.18-3, Section 5.18 of the Draft EIR updates the information in the 2011 WSA to implement the recommendations in the peer review of the Project's water supply and demand assessment and to include the AVAP and General Plan Updates and related CEQA water supply analyses; the AVIRWMP; the approved Adjudication Judgment and Physical Solution for the Antelope Valley groundwater basin; the current AVEK UWMP; the DCR; and State drought emergency and proposed permanent water conservation measures.

The analysis of Project imported water supplies is consistent with and based on the analysis prepared by AVEK in the agency's current UWMP.[2366] The UWMP was approved by AVEK in 2016 and was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. AVEK is one of 29 SWP contractors in California, the largest SWP importer in the Antelope Valley basin, and will import all of the SWP system supplies that the project will use. As discussed on Draft EIR page 5.18-24, the UWMP includes the projected delivery of 4,000 acre-feet per year (afy) of SWP water to the Tejon Ranch Company, all of which will be used for the project. In addition, as discussed on Draft EIR pages 5.18-62 and 5.18-63, AVEK will also import SWP water transferred from the Tulare Lake Basin Water Storage District (1,451 afy) and the Dudley Ridge Water District (1,993 afy) to the Tejon Ranch Company. The transfer agreements are included in Appendices L and K of Draft EIR Appendix 5.18-A, and the agreement with AVEK to import the transferred water supplies in included in Draft EIR Appendix 5.18-E. The projected water deliveries to the Tejon Ranch Company in the UWMP and the SWP transfer water imported by agreement with AVEK are analyzed by using the same methodology in the UWMP analysis of SWP delivery reliability. The UWMP utilizes the current DCR, which the UWMP states is a "biennial report to assist SWP contractors and local planners in assessing the near and long-term availability of supplies from the SWP [and] provides SWP supply estimates for SWP contractors to use in their planning efforts".[2367] The UWMP considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario in the DCR is "the most conservative and appropriate study to use for long term

[2366] *Id.,* Appendix 5.18-F
[2367] *Id.,* Appendix 5.18-F, p. 6-1

planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2368] In addition, the UWMP uses a single dry year SWP allocation level of 5 percent, lower than used in the DCR ELT analysis, to reflect the historically low allocation in 2014. The UWMP analyzes multiple drought year water supplies based on the ELT projections for 1990 to 1992 of 12, 16, and 24 percent of AVEK's Table A amounts, which the UWMP states is the "worst case" 3-year period in the ELT scenario, and which results in an average annual delivery of 17 percent of AVEK's contracted SWP amounts during the drought period. The lowest Table A deliveries of water from the SWP during the most recent drought period, (2013 to 2015) were 35 percent, 5 percent, and 20 percent respectively, which results in an average of 20 percent. The ELT scenario considered in the UWMP uses an average delivery level that is lower than the lowest average 3-year delivery level that occurred during the most recent California drought even with the historically low delivery of 5 percent of SWP contract amounts in 2014.

Consequently, the Project drought year analysis does not rely on the period 1931 to 1933 and is more conservative than the lowest average delivery rates over any three-year period during the most recent drought. To the extent the cited references to sections of the UWMP Planning Act, which pertain to the preparation of UWMPs, are relevant for CEQA purposes, the current AVEK UWMP, as reviewed by the DWR in 2017, is consistent with all of the requirements of the Water Code, including the analysis of drought periods.

The fact that the ELT scenario includes a substantial analysis of climate change is specifically cited as the rationale for using the ELT scenario as stated on Draft EIR pages 5.18-27 and 5.18-28, on page 7-7 of Draft EIR Appendix 5.19-A, and in the AVEK UWMP.[2369] Although the comment does not cite to any specific issues with the analysis of climate change incorporated into the ELT scenario and used in the Project analysis, for informational purposes the following discussion summarizes the climate change factors included in the ELT scenario by the DWR in the current DCR.

The DCR states that the climate change methodologies used in the ELT scenario are described in Appendix 5.A.2, Climate Change Approach and Implications for Aquatic Species, of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2370] As discussed on Draft EIR page 5.18-26, the BDCP is a comprehensive plan prepared by local water agencies, environmental and conservation organizations, State and federal agencies, and other stakeholders to implement a suite of habitat restoration measures, other Delta water quality and habitat stressor reduction activities, and water operations criteria that will facilitate the issuance of long-term permits to operate the SWP and other projects and water operations in the Delta. Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry,

[2368] *Ibid*.
[2369] *Ibid*.
[2370] BDCP 2014

the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Service, the World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2371]

As stated on BDCP Appendix 5.A.2, page 5.A.2-8, natural hydrological variability is often greater than the magnitude of climate change expected over several decades. This requires the use of sophisticated computer models to combine the potential climate change "signal"—the effects on water resources caused by climate change—with the range of natural variability observed in the historical record. In addition, as stated on BDCP Appendix 5.A.2, page 5.A.2-2, global climate models continue to exhibit substantial uncertainty, especially a regional level of analysis. The coarse scale of global climate models requires that results must be "downscaled" and bias corrected for use in the analysis of hydrological impacts at a regional or watershed level. BDCP Appendix 5.A.2 states that the dynamic or statistical methods used for downscaling add another source of uncertainty to the climate change projections.

To address these significant analytical concerns, the DWR, in consultation with multiple state and federal agencies, used a total of 112 IPCC future climate projections that were bias-corrected and statistically downscaled by the Lawrence Livermore National Laboratory under the World Climate Research Program's Coupled Model Intercomparison Project Phase 3 (CMIP3). In order to incorporate both the climate change signal and the natural variability in the longer-term observed record, an expanded time series was used that allows use of the long-term observed records consistent with hydrological and climate change analyses of the Pacific Northwest, the Lower Colorado River, in Texas and in recent Bureau of Reclamation analyses. This approach is called quantile mapping and maps the statistical properties of climate variables from one data subset with the time series of events from a different subset. As summarized on BDCP Appendix 5.A.2, page 5.A.2-8, the quantile mapping approach involves the following steps:

(1) Extract a 30-year slice of downscaled climate projections based on the climate model ensemble subset for the quadrant of interest and centered on the year of investigation (e.g., 2025 or 2060);

(2) For each calendar month (e.g., January) of the future period, determine the statistical properties of temperature and precipitation at each grid cell;

(3) For each calendar month of the historical period determine the statistical properties of temperature and precipitation at each grid cell;

(4) Develop quantile maps between the historical observed statistical properties and the future downscaled climate statistical properties such

[2371] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

that the entire probability distribution (including means, variance, skew, etc.) at the monthly scale is transformed to reflect the climate scenario;

(5) Using the quantile maps, redevelop a monthly time series of temperature and precipitation over the observed period that incorporates the climate shift of the future period; and

(6) Convert monthly time series to a daily time series by scaling monthly values to daily sequence found in the observed record.

The quantile mapping approach generates a monthly or daily time series of temperature and precipitation that has the range of variability observed in the historical record, but also contains the shift in climate properties (both mean and expanded variability) found in the downscaled climate projections. These data were used as inputs to the Variable Infiltration Capacity (VIC) model, which is a hydrologic model that simulates streamflow from rainfall in each watershed, and the streamflow outputs from the VIC model were used as inputs to the SWP (and federal water system) operations models and water quality and water temperature models. CALSIM II, the most current available long-term model of California hydrology, was used to simulate the response of California's river-reservoir conveyance system to climate change.

BDCP Appendix 5.4.A also provides a detailed discussion of the use of a 15-centimeter sea level rise in the ELT scenario. As discussed on BDCP Appendix 5.A.2, page 5.A.2-10, there remains considerable uncertainty in the projections and the state of sea level rise science. A 15-centimeter sea level rise in the ELT scenario was used in the analysis because it represents that mid-range of the available estimates for California water resources facilities during the applicable time period.

Consequently, the ELT scenario in the DCR, and as more conservatively adjusted to account for a single-dry year of 5 percent of SWP deliveries and to use the 1990 to 1992 drought period in the current AVEK UWMP and in the Project water analysis, incorporates an analysis of potential climate change impacts developed to address the substantial analytical issues and uncertainties inherent in the analysis of climate change impacts in California at regional and watershed levels. The analysis methodology has been subject to substantial public and state and federal agency review, and BDCP Appendix 5.4.A has been publicly available since at least 2013. The climate change analysis incorporated into the ELT accounts for the substantial and ongoing uncertainties in the analysis of climate change and water supply planning, including uncertainties about the magnitude and timing of potential sea level increases, the fact that natural climate variability is often much greater than the projected climate change "signals" or effects suggested by a model, and the uncertainties created by downscaling and bias adjusting global climate models for use on regional scales of analysis. The ELT scenario was developed in the DCR by the DWR, the owner and operator of the SWP, which has a legal obligation to analyze the reliability of SWP supplies on a biannual basis. AVEK, the largest SWP importer in the Antelope Valley, and one of only 29 statewide SWP system contractors, considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on

existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2372] The current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site is also based on the ELT projections in the AVEK UWMP.[2373]

In summary, the Project's analysis includes a 3-year drought period from 1990 to 1992 for AVEK deliveries in the ELT scenario. The average annual delivery during this period—17 percent—is lower than any 3-year period during the last drought. The Project analysis also incorporates a comprehensive analysis of potential climate change impacts on water supplies that was developed by agencies with special expertise in water planning and subject to extensive public and state and federal agency review.

Response to Comment F.8-214:

This comment cites the water shortage contingency portion of the 2008 Antelope Valley-East Kern (AVEK) Water Agency Urban Water Management Plan (UWMP). The text of the 2008 UWMP states, "The water shortage response plan was designed based on the assumption that during a long-term drought DWR will have a reduction in water deliveries."[2374] The portion of the quote in the comment after the word "deliveries" does not appear to occur in the cited document.

As discussed on Draft EIR page 5.18-2 and 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water Code by the Golden Valley Municipal Water District (GVMWD) in May 2011.[2375] In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan[2376] for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. In 2014 and 2015, the County of Los Angeles Board of Supervisors published the draft and certified Final Environmental Impact Reports (EIRs) for updates to the Antelope Valley Area Plan (AVAP) and to the County General Plan (General Plan Update) and approved the updated AVAP and General Plan Update. The approved General Plan Update incorporated the previously approved AVAP update, which reduced the level of future growth in unincorporated portions of the Antelope Valley from levels that would have occurred under prior General Plan designations. Antelope Valley regional water supplies and demands were considered in the EIRs prepared for the AVAP and General Plan Updates. In 2013, a regional water users group in the Antelope Valley prepared an update to the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) in accordance with State law. In December 2015, the Superior Court of California approved an Adjudication Judgment and Physical Solution that regulates the Antelope Valley groundwater basin. In June 2016, AVEK adopted its current UWMP, and in June 2015, the California Department of Water Resources (DWR) published the current State Water Project (SWP) Delivery Capability Report (DCR), which includes the most recent analysis of SWP current and future reliability. From 2014 to 2016, the Governor of California, other State agencies, and the California legislature

2372 DRP 2017, Appendix 5.18-F, p. 6-1
2373 DPW 2017, p. 5-1
2374 DRP 2017, Appendix E of Draft EIR Appendix 5.18-A
2375 *Id.,* Appendix 5.18-A
2376 *Ibid*.

implemented several water conservation and management measures in response to a historic drought. A public review draft of proposed permanent state water conservation measures was published by five state agencies in November 2016. As stated on Draft EIR page 5.18-3, Section 5.18 of the Draft EIR updates the information in the 2011 WSA to implement the recommendations in the peer review of the Project's water supply and demand assessment and to include the AVAP and General Plan Updates and related CEQA water supply analyses; the AVIRWMP; the approved Adjudication Judgment and Physical Solution for the Antelope Valley groundwater basin; the current AVEK UWMP; the DCR; and State drought emergency and proposed permanent water conservation measures.

As discussed in Section 5.18 of the Draft EIR, in the current DCR,[2377] and in the current AVEK UWMP,[2378] the DWR, the owner and operator of the State Water Project (SWP), reduces SWP deliveries in dry years when surface water is not available. The DWR has a legal obligation to estimate the delivery reliability of SWP water during normal or average, single-dry and multiple-dry years on a biannual basis to address potential delivery curtailments for statewide water planning purposes. AVEK is one of 29 SWP system contractors, and the cited text included in the 2008 UWMP accurately discusses water shortage contingency based on the fact that DWR will reduce deliveries during a long-term drought. The effects of reduced SWP deliveries due to droughts and other factors is discussed at length in Section 5.18 and quantitatively analyzed in Draft EIR Tables 5.18-10 to 5.18-12 for normal or average, single-dry, and multiple-dry years. The analysis shows that, despite the use of an SWP delivery projection that is more conservative than the current DCR base scenario, the Project has sufficient water supplies to meet full buildout demand on a sustainable basis while retaining an average of 79,000 acre-feet—about 11 years of potable water demand—in the Project's water banks over time. The analysis uses the same methodology and approach in the current AVEK UWMP[2379] which was approved by the agency in 2016 and reviewed and found to meet Water Code requirements by the DWR in 2017.

To the extent the discussion of water shortage contingencies in the current AVEK UWMP are relevant for CEQA purposes, Section 8 of the current UWMP, Water Shortage Contingency Planning, describes how the agency would reduce deliveries to customers by up to 50 percent in the event of water supply shortages in accordance with UWMP preparation requirements under the California Water Code. As discussed in Draft EIR Section 5.18, and quantitatively analyzed in Draft EIR Tables 5.18-10 to 5.18-12 for normal or average, single-dry, and multiple-dry years, the Project analysis includes the potential reduction of up to 95 percent of imports provided by AVEK (a single year delivery of imported water of just 5 percent), and several other years in which deliveries would be lower than 50 percent of potential full amounts. The analysis shows that other sources of Project water supply are more than sufficient to meet demand during these drier periods when SWP supplies imported by AVEK would be subject to curtailment of up to 95 percent of potential full amounts. The comment does not identify any substantive issue or concern with the analysis of Project water supplies.

2377 *Id.,* Appendix 5.18-C
2378 *Id.,* Appendix 5.18-F
2379 *Ibid*.

Response to Comment F.8-215:

This comment inaccurately describes the Project's existing volume of banked water and includes unsubstantiated, speculative assertions about the reliability of banked supplies in the Antelope Valley that are not reflected in the current water management plans adopted by water agencies in the region.

As discussed on Draft EIR pages 5.18-2 and 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water Code by the Golden Valley Municipal Water District (GVMWD) in May 2011.[2380] In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan[2381] for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. In 2014 and 2015, the County of Los Angeles Board of Supervisors published the draft and certified Final Environmental Impact Reports (EIRs) for updates to the Antelope Valley Area Plan (AVAP) and to the County General Plan (General Plan Update) and approved the updated AVAP and General Plan Update. The approved General Plan Update incorporated the previously approved AVAP update, which reduced the level of future growth in unincorporated portions of the Antelope Valley from levels that would have occurred under prior General Plan designations. Antelope Valley regional water supplies and demands were considered in the EIRs prepared for the AVAP and General Plan Updates. In 2013, a regional water users group in the Antelope Valley prepared an update to the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) in accordance with State law. In December 2015, the Superior Court of California approved an Adjudication Judgment and Physical Solution that regulates the Antelope Valley groundwater basin. In June 2016, AVEK adopted its current UWMP, and in June 2015, the California Department of Water Resources (DWR) published the current State Water Project (SWP) Delivery Capability Report (DCR), which includes the most recent analysis of SWP current and future reliability. From 2014 to 2016, the Governor of California, other State agencies, and the California legislature implemented several water conservation and management measures in response to a historic drought. A public review draft of proposed permanent state water conservation measures was published by five state agencies in November 2016. As stated on Draft EIR page 5.18-3, Section 5.18 of the Draft EIR updates the information in the 2011 WSA to implement the recommendations in the peer review of the Project's water supply and demand assessment and to include the AVAP and General Plan Updates and related CEQA water supply analyses; the AVIRWMP; the approved Adjudication Judgment and Physical Solution for the Antelope Valley groundwater basin; the current AVEK UWMP; the DCR; and State drought emergency and proposed permanent water conservation measures.

As discussed on Draft EIR pages 3-7, 5.18-52, and 5.18-61, the Tejon Ranch Company (TRC) and its affiliates currently own and operate a water bank on 160 acres located northeast of the Project site in Kern County (TRC Water Bank). The water bank was constructed in 2006 and currently stores water for TRC and AVEK. As of December 2015, approximately 17,287 acre-feet had been stored in the TRC Water Bank for Project use. As discussed on Draft EIR page 5.18-61, the stored water was conveyed from the California Aqueduct to the TRC Water

[2380] *Id.,* Appendix 5.18-A
[2381] *Ibid*.

Bank, released into the bank's percolation ponds, and infiltrated into the ground. TRC is storing the banked water for the benefit of the Project in accordance with an agreement between TRC and the Project Applicant.[2382]

The TRC Water Bank is included as a preexisting banking facility that will continue operations in the Antelope Valley in accordance with the Antelope Valley Basin Adjudication Judgment and Physical Solution entered by the Superior Court in December 2015.[2383] All Project groundwater use will comply with the Adjudication Judgment and Physical Solution. The Adjudication Judgment and Physical Solution was approved by the Court to sustainably manage Antelope Valley groundwater resources over time. Consistent with the Adjudication Judgment and Physical Solution, 10 percent of the stored amount of water must be retained in the aquifer to supplement groundwater supplies and to account for infiltration and extraction losses. The analysis of Project water supplies, including in Draft EIR Tables 5.18-10 to 5.18-12 for normal or average, single dry and multiple dry years, properly include the existing water bank balance of 17,287 acre-feet and subsequently increase the amounts in the Project's water banks to account for wetter years, when available water would be stored in the banks, and decrease the storage amounts in drier years, when water would be extracted from the banks when imported water was less available. As required by the Adjudication Judgment and Physical Solution, the Project analysis incorporates the requirement that 10 percent of the stored amount of water must be retained in the aquifer to supplement groundwater supplies and to account for infiltration and extraction losses. Consequently, the Project analysis is based on actual amounts of water that are stored in an existing, operational water bank included in the Adjudication Judgment and Physical Solution and projects future water banking activity in a manner that complies with the requirements of the Adjudication Judgment and Physical Solution.

No evidence of any kind is provided to support the implication that earthquakes, pollution or other unforeseen factors not otherwise accounted for in the water banking requirements established under the Adjudication Judgment and Physical Solution require the assumption that no banked water of any amount may be considered to be available for Project use, even though 17,287 acre-feet is actually stored in the existing TRC Water Bank. The Adjudication Judgment and Physical Solution requires no such methodology or speculative analysis, nor do other, major water agencies use such an approach in their analyses of water banking in the Antelope Valley and other locations. Groundwater banking is discussed in both the current AVEK UWMP and the current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site. AVEK and the Los Angeles County Waterworks District 40 are two of largest water districts in the Antelope Valley and are subject to the Adjudication Judgment and Physical Solution. Consistent with the Project analysis, the AVEK UWMP identifies the amount of water AVEK has currently put into storage in existing water banks (34,100 acre-feet), and projects that all of this water will be available in future years less the 10 percent leave-behind amount required by the Adjudication Judgment and Physical Solution.[2384] Section 5.1.1 of the Los Angeles County Waterworks District 40 UWMP provides a detailed discussion of several existing and

[2382] *Id.,* Appendix I of Appendix 5.18-A
[2383] *Id.,* Appendix 5.18-D
[2384] *Id.,* Appendix 5.18-F, p. 8-4

proposed water banking facilities in and outside of the Antelope Valley. These include the AVEK Westside Water Bank with a recovery capacity of 36,000 afy, the Antelope Valley Water Bank (AVWB), an 18-square-mile water banking facility that will be capable of 100,000 afy of recharge and 100,000 afy at buildout, the AVEK Water Supply Stabilization Project 2 (WSSP2) groundwater basin banking project that will be capable of delivering up to 30,000 afy, and the existing Semitropic Water Storage District (Semitropic) located in the San Joaquin Valley in north-central Kern County, with a storage capacity of 1 million acre-feet, a recharge capacity of 90,500 afy, and a firm extraction capacity of 90,000 afy. The Los Angeles County Waterworks District 40 UWMP states that water banking is a crucial strategy that involves storing water when it is available in wet years or low-demand periods and subsequently recovering it in periods of drought or high demand. Water banking losses are assumed to be 10 percent in the District's UWMP consistent with the Adjudication Judgment and Physical Solution. The UWMP states that the District has adequate water supplies to meet projected demands normal, single-dry year, and multiple-dry years through the use of banked water which is projected to range in amounts from 25,300 to 70,525 afy.[2385] Neither the current AVEK nor the Los Angeles County Waterworks District 40 UWMPs assume that existing banked water supplies must be ignored in future projections of water supplies, or that these banked amounts are subject to speculative losses above the requirements of the Adjudication Judgment and Physical Solution. The comment does not identify any substantive issues or concerns with the analysis of Project water supplies, including water banking supplies.

Response to Comment F.8-216:

This comment cites a statement on page 5-1 of Draft EIR Appendix 5.18-A and not, as stated, to Draft EIR Section 5.18. The comment inaccurately describes how banked water is used to meet Project demand over time as summarized in Draft EIR Tables 5.18-10 to 5.18-12 for normal or average, single-dry, and multiple-dry years and incorrectly references the drought period used in the Project analysis.

As discussed on Draft EIR pages 5.18-2 and 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water Code by the Golden Valley Municipal Water District (GVMWD) in May 2011.[2386] In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan[2387] for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. In 2014 and 2015, the County of Los Angeles Board of Supervisors published the draft and certified Final Environmental Impact Reports (EIRs) for updates to the Antelope Valley Area Plan (AVAP) and to the County General Plan (General Plan Update) and approved the updated AVAP and General Plan Update. The approved General Plan Update incorporated the previously approved AVAP update, which reduced the level of future growth in unincorporated portions of the Antelope Valley from levels that would have occurred under prior General Plan designations. Antelope Valley regional water supplies and demands were considered in the EIRs prepared for the AVAP and General Plan Updates. In 2013, a regional

2385 DPW 2017, p. ES-3
2386 DRP 2017, Appendix 5.18-A
2387 *Ibid*.

water users group in the Antelope Valley prepared an update to the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) in accordance with State law. In December 2015, the Superior Court of California approved an Adjudication Judgment and Physical Solution that regulates the Antelope Valley groundwater basin. In June 2016, AVEK adopted its current UWMP, and in June 2015, the California Department of Water Resources (DWR) published the current State Water Project (SWP) Delivery Capability Report (DCR), which includes the most recent analysis of SWP current and future reliability. From 2014 to 2016, the Governor of California, other State agencies, and the California legislature implemented several water conservation and management measures in response to a historic drought. A public review draft of proposed permanent state water conservation measures was published by five state agencies in November 2016. As stated on Draft EIR page 5.18-3, Section 5.18 of the Draft EIR updates the information in the 2011 WSA to implement the recommendations in the peer review of the Project's water supply and demand assessment and to include the AVAP and General Plan Updates and related CEQA water supply analyses; the AVIRWMP; the approved Antelope Valley Basin Adjudication Judgment and Physical Solution for the Antelope Valley groundwater basin; the current AVEK UWMP; the DCR; and State drought emergency and proposed permanent water conservation measures.

The analysis of Project imported water supplies is consistent with and based on the analysis prepared by AVEK in the agency's current UWMP[2388] prepared and adopted in accordance with California Water Code Sections 10610 et seq. (the "Urban Water Management Planning Act"). The UWMP was approved by AVEK in 2016 and was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. AVEK is one of 29 SWP contractors with the DWR in California, and imports SWP water used in the Antelope Valley basin, including all of the SWP system supplies that the project will use. The UWMP utilizes the current DCR, which the UWMP states is a "biennial report to assist SWP contractors and local planners in assessing the near and long-term availability of supplies from the SWP [and] provides SWP supply estimates for SWP contractors to use in their planning efforts".[2389] The UWMP considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario in the DCR is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2390] In addition, the UWMP uses a single dry year SWP allocation level of 5 percent, lower than used in the DCR ELT analysis, to reflect the historically low allocation in 2014. The UWMP analyzes multiple drought year water supplies based on the ELT projections for 1990 to 1992 of 12, 16, and 24 percent of AVEK's Table A amounts, which the UWMP states is the "worst case" 3-year period in the ELT scenario, and which results in an average annual delivery of 17 percent of AVEK's contracted SWP amounts during the drought period. The lowest Table A deliveries of water from the SWP during the most recent drought period, (2013 to 2015) were 35 percent, 5 percent, and 20 percent respectively, which results in an average of 20 percent. The ELT scenario considered in the UWMP uses an average delivery

2388 *Id.,* Appendix 5.18-F
2389 *Id.,* Appendix 5.18-F, p. 6-1
2390 Ibid.

level that is lower than the lowest average 3-year delivery level that occurred during the most recent California drought even with the historically low delivery of 5 percent of SWP contract amounts in 2014. Consequently, the Project drought year analysis does rely on the period 1931 to 1933 and is more conservative than the lowest average delivery rates over any three-year period during the most recent drought.

As discussed on Draft EIR page 5.18-54 and shown in Tables 5.18-10 to 5.18-12, the Project's water supplies include the following: (1) water currently banked at the existing TRC Water Bank to the north of the Project site; (2) purchased and in-lieu program rights to water deliveries from AVEK and the return of certain water supplies loaned to AVEK in 2008 and 2009 for later return and delivery (collectively, AVEK call water); (3) groundwater subject to the allocations in the Adjudication Judgment and Physical Solution;[2391] (4) Table A Amounts transferred from the Tulare Lake Basin Water Storage District and the Dudley Ridge Water District that will be imported for Project use under an existing agreement with AVEK;[2392] (5) service area deliveries of SWP water by AVEK that are incorporated in the Agency's current UWMP; (6) recycled water treated to Title 22 unrestricted reuse levels generated by the Project's on-site wastewater treatment facilities; and (7) in-basin return flows from Project imported water use in accordance with the Adjudication Judgment and Physical Solution.[2393] The existing TRC Water Bank and the proposed on-site water bank will be used to bank, store, and retrieve water for use in dry periods to enhance the Project's overall water supply reliability.

The methodology used to analyze Project demand and supply in Draft EIR Tables 5.18-10, 5.18-11, and 5.18-12 reflects the terms and conditions of the Adjudication Judgment and Physical Solution pertaining to groundwater, return flow and banked water use,[2394] the AVEK import agreement for the Tulare Lake Basin Water Storage District and the Dudley Ridge Water District,[2395] and the projections of imported water volumes under hydrological conditions that consider climate change and average, single dry and multiple dry year conditions consistent with the AVEK UWMP.[2396] All available resources are shown as supplies in Draft EIR Tables 5.18-10, 5.18-11, and 5.18-12 after applicable adjustments. For example, as shown in Draft EIR Tables 5.18-10, 5.18-11, and 5.18-12, all AVEK imports of Tulare Lake and Dudley ridge water under the AVEK import agreement are reduced by 5 percent for delivery to AVEK as required by the agreement.[2397] Certain water supplies, such as unused groundwater allocated to TRC, and return flows from imported water, are subject to a 10-year carryover provision in the Adjudication Judgment and Physical Solution.[2398] All recycled water use is presumed to be utilized by outdoor vegetation or subject to evapotranspiration and is not treated as a potential source of additional recharge or supply once utilized. As discussed on Draft EIR page 5.18-64, returns flows from urban imported water use in the Antelope Valley Basin may be recovered by the importing party in an

2391 *Id.,* Appendix 5.4-D
2392 *Id.,* Appendix 5.4-E
2393 *Id.,* Appendix 5.4-D
2394 Ibid.
2395 *Id.,* Appendix 5.18-E
2396 *Id.,* Appendix 5.4-F
2397 *Id.,* Appendix 5.4-E, p. 3
2398 *Id.,* Appendix 5.18-D, p. 42

amount equal to 39 percent of the average imported water use over the prior 5 years. As shown in Table 5.18-10, the amount of in-basin return flows attributable to the Project's imported water use will increase as the Project is developed and will mature 5 years after buildout. At full buildout in Year 20, in-basin return flows will be approximately 862 afy and will increase to a maximum of 1,034 afy by Year 25. In each year, the difference between the available water supply and demand is calculated. If supply exceeds demand, the excess supply is delivered to and stored in the Project water banks. If demand exceeds supply, the excess demand is met by using banked water subject to the 10 percent leave-behind requirement in the Adjudication Judgment and Physical Solution. As shown in Tables 5.18-10, 5.18-11, and 5.18-12, the Project's water supplies meet projected demand at buildout and, on a sustainable basis thereafter, allow for the maintenance of an average annual reserve banked supply of more than 79,000 acre-feet. The amount of the average annual reserve that will be maintained in the water banks equates to more than 11 years of the Project's full buildout potable demand and provides the Project with a significant emergency supply.

This analytical approach is consistent with the AVEK UWMP analysis of imported water reliability, the terms of the Tulare and Dudley Ridge import agreement with AVEK, the use of groundwater, return flows, and banked water under the Adjudication Judgment and Physical Solution, and the state of California and Lahontan Regional Water Quality Control Board policies and requirements for recycled water use. The Project's water supply and banking analysis is also consistent with the methodology used in the current Los Angeles County Waterworks District 40 UWMP to analyze similar water supplies for portions of the Antelope Valley east of the Project area.[2399] None of these analyses, including the Project, assume water is a static entity, and the comment does not identify any substantive issue or concern with the analysis of Project water supplies, including water banking supplies.

Response to Comment F.8-217:

This comment cites a statement contained on page 5-5 of Draft EIR Appendix 5.18-A. The italicized portion of the comment and the phrase that contains the word "proper" in quotes do not appear in the Draft EIR or in a Draft EIR appendix. The comment inaccurately quantifies the amount of banked water that is available for use to meet Project demand over time in Draft EIR Tables 5.18-10 to 5.18-12 for normal or average, single-dry, and multiple-dry years and does not acknowledge that the Project water supply analysis incorporates a comprehensive analysis of climate change prepared by agencies with expertise in water planning. Finally, the comment provides no supporting evidence for the suggestion that water banks are poorly managed, an assertion that is also not consistent with the analysis of water banking in current Urban Water Management Plans adopted by major water districts in the Antelope Valley and the regulatory oversight of water banking applicable to the Project and other water banks under the Antelope Valley Basin Adjudication Judgment and Physical Solution.

As discussed on Draft EIR pages 5.18-2 and 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water

[2399] DPW 2017

Code by the Golden Valley Municipal Water District (GVMWD) in May 2011.[2400] In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan[2401] for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. In 2014 and 2015, the County of Los Angeles Board of Supervisors published the draft and certified Final Environmental Impact Reports (EIRs) for updates to the Antelope Valley Area Plan (AVAP) and to the County General Plan (General Plan Update) and approved the updated AVAP and General Plan Update. The approved General Plan Update incorporated the previously approved AVAP update, which reduced the level of future growth in unincorporated portions of the Antelope Valley from levels that would have occurred under prior General Plan designations. Antelope Valley regional water supplies and demands were considered in the EIRs prepared for the AVAP and General Plan Updates. In 2013, a regional water users group in the Antelope Valley prepared an update to the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) in accordance with State law. In December 2015, the Superior Court of California approved an Adjudication Judgment and Physical Solution that regulates the Antelope Valley groundwater basin. In June 2016, AVEK adopted its current UWMP, and in June 2015, the California Department of Water Resources (DWR) published the current State Water Project (SWP) Delivery Capability Report (DCR), which includes the most recent analysis of SWP current and future reliability. From 2014 to 2016, the Governor of California, other State agencies, and the California legislature implemented several water conservation and management measures in response to a historic drought. A public review draft of proposed permanent state water conservation measures was published by five state agencies in November 2016. As stated on Draft EIR page 5.18-3, Section 5.18 of the Draft EIR updates the information in the 2011 WSA to implement the recommendations in the peer review of the Project's water supply and demand assessment and to include the AVAP and General Plan Updates and related CEQA water supply analyses; the AVIRWMP; the approved Antelope Valley Basin Adjudication Judgment and Physical Solution for the Antelope Valley groundwater basin; the current AVEK UWMP; the DCR; and State drought emergency and proposed permanent water conservation measures.

As discussed on Draft EIR page 5.18-54 and shown in Tables 5.18-10 to 5.18-12, the Project's water supplies include the following: (1) water currently banked at the existing TRC Water Bank to the north of the Project site; (2) purchased and in-lieu program rights to water deliveries from AVEK and the return of certain water supplies loaned to AVEK in 2008 and 2009 for later return and delivery (collectively, AVEK call water); (3) groundwater subject to the allocations in the Adjudication Judgment and Physical Solution;[2402] (4) Table A Amounts transferred from the Tulare Lake Basin Water Storage District and the Dudley Ridge Water District that will be imported for Project use under an existing agreement with AVEK;[2403] (5) service area deliveries of SWP water by AVEK that are incorporated in the Agency's current UWMP; (6) recycled water treated to Title 22 unrestricted reuse levels generated by the Project's on-site wastewater treatment facilities; and (7) in-basin return flows from Project imported water use in accordance with the Adjudication Judgment and

[2400] DRP 2017, Appendix 5.18-A
[2401] *Ibid*.
[2402] *Id.,* Appendix 5.4-D
[2403] *Id.,* Appendix 5.4-E

Physical Solution.[2404] The existing TRC Water Bank and the proposed on-site water bank will be used to bank, store, and retrieve water for use in dry periods to enhance the Project's overall water supply reliability. As shown in Draft EIR Tables 5.18-10, 5.18-11, and 5.18-12, the Project's water supplies meet projected demand at buildout and, on a sustainable basis thereafter, allow for the maintenance of an average annual reserve banked supply of more than 79,000 acre-feet. The amount of the average annual reserve that will be maintained in the water banks equates to more than 11 years of the Project's full buildout potable demand.

As shown in Draft EIR Table 5.18-10, in normal years, virtually no water would be used from the water banks to meet demand. As shown in Draft EIR Table 5.18-11, in a single-dry year where just 5 percent of imported supplies would be available, the Project would require the use of banked water to meet demand in amounts ranging from a projected 2,999 acre-feet in Year 5 to 3,946 acre-feet at buildout in Year 20. As shown in Draft EIR Table 5.18-12, excluding early years of the Project when supplies would exceed demand, during drought periods the amount of banked water required to meet demand would range from about 539 acre-feet in Year 8 to 3,163 acre-feet in Year 18. As shown in Draft EIR Tables 5.18-11 and 5.18-12, after accounting for annual transfers from the water banks and the 10 percent leave-behind required by the Adjudication Judgment and Physical Solution, a substantial reserve supply would still be maintained in the water banks during and immediately after a single dry year and a multiple year drought. This reserve would subsequently be augmented by banked supplies during wetter years. This analytical approach and use of water banking is consistent with the AVEK UWMP and the methodology used in the current Los Angeles County Waterworks District 40 UWMP to analyze substantially similar water supplies for portions of the Antelope Valley east of the Project area.[2405]

Groundwater banking is also discussed in both the current AVEK UWMP and the current UWMP adopted by Los Angeles County Waterworks District 40. AVEK and the Los Angeles County Waterworks District 40 are two of largest water districts in the Antelope Valley and are subject to the Adjudication Judgment and Physical Solution. Both the AVEK UWMP and Los Angeles County Waterworks District 40 UWMP analyses include water banking, including in-basin banks subject to the Adjudication Judgment and Physical Solution. The water banking facilities discussed in the UWMPs include the AVEK Westside Water Bank,[2406] the Antelope Valley Water Bank (AVWB), an 18-square-mile water banking facility that will be capable of 100,000 afy of recharge and 100,000 afy at buildout, the AVEK Water Supply Stabilization Project 2 (WSSP2) groundwater basin banking project that will be capable of delivering up to 30,000 afy, and out of basin banks such as the existing Semitropic Water Storage District (Semitropic) located in the San Joaquin Valley in north-central Kern County, with a storage capacity of 1 million acre-feet, a recharge capacity of 90,500 afy, and a firm extraction capacity of 90,000 afy. The Los Angeles County Waterworks District 40 UWMP states that water banking is a crucial strategy that involves storing water when it is available in wet years or low-demand periods and subsequently recovering it in periods of drought or high demand. Indeed, the Los Angeles County Waterworks District 40 UWMP states that the District has adequate water supplies to meet projected demands normal, single-dry year, and

[2404] *Id.,* Appendix 5.4-D
[2405] DPW 2017
[2406] DRP 2017, Appendix 5.18-F, p. 8-4

multiple-dry years through the use of banked water which is projected to range in amounts from 25,300 to 70,525 afy.[2407] Neither of the UWMPs includes any suggestion, reference or discussion of "infamously poor" water bank management as stated in the comment, and the comment itself provides no support for this assertion.

The comment also suggests that the Project analysis of banking supplies is "untenable" because it does not account for climate change. This assertion is inaccurate because the ELT scenario used in the AVEK UWMP and in the Project analysis includes a substantial analysis of climate change. The inclusion of climate change factors in the ELT scenario is specifically cited as the rationale for using the ELT scenario on Draft EIR pages 5.18-27 and 5.18-28, on page 7-7 of Draft EIR Appendix 5.19-A, and in the AVEK UWMP.[2408] The following discussion summarizes the ELT analysis of climate change for informational purposes.

The DCR states that the climate change methodologies used in the ELT scenario are described in Appendix 5.A.2, Climate Change Approach and Implications for Aquatic Species, of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2409] As discussed on Draft EIR page 5.18-26, the BDCP is a comprehensive plan prepared by local water agencies, environmental and conservation organizations, State and federal agencies, and other stakeholders to implement a suite of habitat restoration measures, other Delta water quality and habitat stressor reduction activities, and water operations criteria that will facilitate the issuance of long-term permits to operate the SWP and other projects and water operations in the Delta. Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Service, the World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2410]

As stated on BDCP Appendix 5.A.2, page 5.A.2-8, natural hydrological variability is often greater than the magnitude of climate change expected over several decades. This requires the use of sophisticated computer models to combine the potential climate change "signal"—the effects on water resources caused by climate change—with the range of natural variability observed in the historical record. In addition, as stated on BDCP Appendix 5.A.2, page 5.A.2-2, global climate models continue to exhibit substantial uncertainty, especially a regional level of analysis. The coarse scale of global climate models requires that results must be "downscaled" and bias corrected for use in the analysis of hydrological impacts at a regional or watershed level. BDCP Appendix 5.A.2 states that the dynamic or statistical

[2407] DPW 2017, p. ES-3
[2408] DRP 2017, Appendix 5.18-5, p. 6-1
[2409] BDCP 2014
[2410] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

methods used for downscaling add another source of uncertainty to the climate change projections.

To address these significant analytical concerns, the DWR, in consultation with multiple state and federal agencies, used a total of 112 IPCC future climate projections that were bias-corrected and statistically downscaled by the Lawrence Livermore National Laboratory under the World Climate Research Program's Coupled Model Intercomparison Project Phase 3 (CMIP3). In order to incorporate both the climate change signal and the natural variability in the longer-term observed record, an expanded time series was used that allows use of the long-term observed records consistent with hydrological and climate change analyses of the Pacific Northwest, the Lower Colorado River, in Texas and in recent Bureau of Reclamation analyses. This approach is called quantile mapping and maps the statistical properties of climate variables from one data subset with the time series of events from a different subset. As summarized on BDCP Appendix 5.A.2, page 5.A.2-8, the quantile mapping approach involves the following steps:

(1) Extract a 30-year slice of downscaled climate projections based on the climate model ensemble subset for the quadrant of interest and centered on the year of investigation (e.g., 2025 or 2060);

(2) For each calendar month (e.g., January) of the future period, determine the statistical properties of temperature and precipitation at each grid cell;

(3) For each calendar month of the historical period determine the statistical properties of temperature and precipitation at each grid cell;

(4) Develop quantile maps between the historical observed statistical properties and the future downscaled climate statistical properties such that the entire probability distribution (including means, variance, skew, etc.) at the monthly scale is transformed to reflect the climate scenario;

(5) Using the quantile maps, redevelop a monthly time series of temperature and precipitation over the observed period that incorporates the climate shift of the future period; and

(6) Convert monthly time series to a daily time series by scaling monthly values to daily sequence found in the observed record.

The quantile mapping approach generates a monthly or daily time series of temperature and precipitation that has the range of variability observed in the historical record, but also contains the shift in climate properties (both mean and expanded variability) found in the downscaled climate projections. These data were used as inputs to the Variable Infiltration Capacity (VIC) model, which is a hydrologic model that simulates streamflow from rainfall in each watershed, and the streamflow outputs from the VIC model were used as inputs to the SWP (and federal water system) operations models and water quality and water temperature models. CALSIM II, the most current available long-term model of California hydrology, was used to simulate the response of California's river-reservoir conveyance system to climate change.

BDCP Appendix 5.4.A also provides a detailed discussion of the use of a 15-centimeter sea level rise in the ELT scenario. As discussed on BDCP Appendix 5.A.2, page 5.A.2-10, there remains considerable uncertainty in the projections and the state of sea level rise science. A 15-centimeter sea level rise in the ELT scenario was used in the analysis because it represents that mid-range of the available estimates for California water resources facilities during the applicable time period.

Consequently, the ELT scenario in the DCR, and as more conservatively adjusted to account for a single-dry year of 5 percent of SWP deliveries and to use the 1990 to 1992 drought period in the current AVEK UWMP and in the Project water analysis, incorporates an analysis of potential climate change impacts developed to address the substantial analytical issues and uncertainties inherent in the analysis of climate change impacts in California at regional and watershed levels. The analysis methodology has been subject to substantial public and state and federal agency review, and BDCP Appendix 5.4.A has been publicly available since at least 2013. The climate change analysis incorporated into the ELT accounts for the substantial and ongoing uncertainties in the analysis of climate change and water supply planning, including uncertainties about the magnitude and timing of potential sea level increases, the fact that natural climate variability is often much greater than the projected climate change "signals" or effects suggested by a model, and the uncertainties created by downscaling and bias adjusting global climate models for use on regional scales of analysis. The ELT scenario was developed in the DCR by the DWR, the owner and operator of the SWP, which has a legal obligation to analyze the reliability of SWP supplies on a biannual basis. AVEK, the largest SWP importer in the Antelope Valley, and one of only 29 statewide SWP system contractors, considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2411] The current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site is also based on the ELT projections in the AVEK UWMP.[2412]

In summary, the comment provides unsubstantiated assertions about water banking management that are not supported in the current UWMPs adopted by AVEK and Los Angeles County Waterworks District 40, inconsistent with the water banking provisions of the Adjudication Judgment and Physical Solution, and do not identify any substantive issues or concerns with the analysis of Project water supplies.

Response to Comment F.8-218:

This comment inaccurately describes the Project's existing volume of banked water and includes unsubstantiated, speculative assertions about analysis of banked supplies in the Antelope Valley that are not reflected in the current water management plans adopted by water agencies in the region.

[2411] DRP 2017, Appendix 5.18-F, p. 6-1
[2412] DPW 2017, p. 5-1

As discussed on Draft EIR pages 5.18-2 and 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water Code by the Golden Valley Municipal Water District (GVMWD) in May 2011.[2413] In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan[2414] for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. In 2014 and 2015, the County of Los Angeles Board of Supervisors published the draft and certified Final Environmental Impact Reports (EIRs) for updates to the Antelope Valley Area Plan (AVAP) and to the County General Plan (General Plan Update) and approved the updated AVAP and General Plan Update. The approved General Plan update incorporated the previously approved AVAP update, which reduced the level of future growth in unincorporated portions of the Antelope Valley from levels that would have occurred under prior General Plan designations. Antelope Valley regional water supplies and demands were considered in the EIRs prepared for the AVAP and General Plan Updates. In 2013, a regional water users group in the Antelope Valley prepared an update to the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) in accordance with State law. In December 2015, the Superior Court of California approved an Adjudication Judgment and Physical Solution that regulates the Antelope Valley groundwater basin. In June 2016, AVEK adopted its current UWMP, and in June 2015, the California Department of Water Resources (DWR) published the current State Water Project (SWP) Delivery Capability Report (DCR), which includes the most recent analysis of SWP current and future reliability. From 2014 to 2016, the Governor of California, other State agencies, and the California legislature implemented several water conservation and management measures in response to a historic drought. A public review draft of proposed permanent state water conservation measures was published by five state agencies in November 2016. As stated on Draft EIR page 5.18-3, Section 5.18 of the Draft EIR updates the information in the 2011 WSA to implement the recommendations in the peer review of the Project's water supply and demand assessment and to include the AVAP and General Plan Updates and related CEQA water supply analyses; the AVIRWMP; the approved Antelope Valley Basin Adjudication Judgment and Physical Solution for the Antelope Valley groundwater basin; the current AVEK UWMP; the DCR; and State drought emergency and proposed permanent water conservation measures.

As discussed on Draft EIR pages 3-7, 5.18-52, and 5.18-61, the Tejon Ranch Company (TRC) and its affiliates currently own and operate a water bank on 160 acres located northeast of the Project site in Kern County (TRC Water Bank). The water bank was constructed in 2006 and currently stores water for TRC and the AVEK. As of December 2015, approximately 17,287 acre-feet had been stored in the TRC Water Bank for Project use. As discussed on Draft EIR page 5.18-61, the stored water was conveyed from the California Aqueduct to the TRC Water Bank, released into the bank's percolation ponds, and infiltrated into the ground. TRC is storing the banked water for the benefit of the Project in accordance with an agreement between TRC and the Project Applicant.[2415]

[2413] DRP 2017, Appendix 5.18-A

[2414] *Ibid*.

[2415] *Id.,* Appendix I of Draft EIR Appendix 5.18-A

The TRC Water Bank is included as a preexisting banking facility that will continue operations in the Antelope Valley in accordance with the Antelope Valley Adjudication Judgment and Physical Solution entered by the Superior Court in December 2015.[2416] All Project groundwater use will comply with the Adjudication Judgment and Physical Solution. The Adjudication Judgment and Physical Solution was approved by the Court to sustainably manage Antelope Valley groundwater resources over time. Consistent with the Adjudication Judgment and Physical Solution, 10 percent of the stored amount of water must be retained in the aquifer to supplement groundwater supplies and to account for infiltration and extraction losses. The analysis of Project water supplies, including in Draft EIR Tables 5.18-10 to 5.18-12 for normal or average, single dry and multiple dry years, properly include the existing water bank balance of 17,287 acre-feet and subsequently increase the amounts in the Project's water banks to account for wetter years, when available water would be stored in the banks, and decrease the storage amounts in drier years, when water would be extracted from the banks when imported water was less available. As required by the Adjudication Judgment and Physical Solution, the Project analysis incorporates the requirement that 10 percent of the stored amount of water must be retained in the aquifer to supplement groundwater supplies and to account for infiltration and extraction losses. Consequently, the Project analysis is based on actual amounts of water that are stored in an existing, operational water bank included in the Adjudication Judgment and Physical Solution and projects future water banking activity in a manner that complies with the requirements of the Adjudication Judgment and Physical Solution.

No evidence of any kind is provided to support the comment's assertion that the analysis of water banking supplies requires the assumption that no banked water of any amount may be considered to be available for Project use, even though 17,287 acre-feet is actually stored in the existing TRC Water Bank. The Adjudication Judgment and Physical Solution requires no such methodology or speculative analysis, nor do other, major water agencies use such an approach in their analyses of water banking in the Antelope Valley and other locations. Groundwater banking is discussed in both the current AVEK UWMP and the current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site. AVEK and the Los Angeles County Waterworks District 40 are two of largest water districts in the Antelope Valley and are subject to the Adjudication Judgment and Physical Solution. Consistent with the Project analysis, the AVEK UWMP identifies the amount of water AVEK has currently put into storage in existing water banks (34,100 acre-feet), and projects that all of this water will be available in future years less the 10 per cent leave-behind amount required by the Adjudication Judgment and Physical Solution.[2417] Section 5.1.1 of the Los Angeles County Waterworks District 40 UWMP provides a detailed discussion of several existing and proposed water banking facilities in and outside of the Antelope Valley. These include the AVEK Westside Water Bank with a recovery capacity of 36,000 afy, the Antelope Valley Water Bank (AVWB), an 18-square-mile water banking facility that will be capable of 100,000 afy of recharge and 100,000 afy at buildout, the AVEK Water Supply Stabilization Project 2 (WSSP2) groundwater basin banking project that will be capable of delivering up to 30,000 afy, and the existing Semitropic Water Storage

[2416] *Id.,* Appendix 5.18-D
[2417] *Id.,* Appendix 5.18-F, p. 8-4

District (Semitropic) located in the San Joaquin Valley in north-central Kern County, with a storage capacity of 1 million acre-feet, a recharge capacity of 90,500 afy, and a firm extraction capacity of 90,000 afy. The Los Angeles County Waterworks District 40 UWMP states that water banking is a crucial strategy that involves storing water when it is available in wet years or low-demand periods and subsequently recovering it in periods of drought or high demand. Water banking losses are assumed to be 10 percent in the District's UWMP consistent with the Adjudication Judgment and Physical Solution. The UWMP states that the District has adequate water supplies to meet projected demands normal, single-dry year, and multiple-dry years through the use of banked water which is projected to range in amounts from 25,300 to 70,525 afy.[2418] Neither the current AVEK nor the Los Angeles County Waterworks District 40 UWMPs assume that existing banked water supplies must be ignored or reduced to "zero" in future projections of water supplies. The comment does identify any substantive issues or concerns with the analysis of Project water supplies, including water banking supplies.

Response to Comment F.8-219:

This comment cites a statement contained on page 4-1 of Draft EIR Appendix 5.18-A. As discussed on Draft EIR pages 5.18-2 and 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water Code by the Golden Valley Municipal Water District (GVMWD) in May 2011.[2419] In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan[2420] for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. In 2014 and 2015, the County of Los Angeles Board of Supervisors published the draft and certified Final Environmental Impact Reports (EIRs) for updates to the Antelope Valley Area Plan (AVAP) and to the County General Plan (General Plan Update) and approved the updated AVAP and General Plan Update. The approved General Plan update incorporated the previously approved AVAP update, which reduced the level of future growth in unincorporated portions of the Antelope Valley from levels that would have occurred under prior General Plan designations. Antelope Valley regional water supplies and demands were considered in the EIRs prepared for the AVAP and General Plan Updates. In 2013, a regional water users group in the Antelope Valley prepared an update to the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) in accordance with State law. In December 2015, the Superior Court of California approved an Adjudication Judgment and Physical Solution that regulates the Antelope Valley groundwater basin. In June 2016, AVEK adopted its current UWMP, and in June 2015, the California Department of Water Resources (DWR) published the current State Water Project (SWP) Delivery Capability Report (DCR), which includes the most recent analysis of SWP current and future reliability. From 2014 to 2016, the Governor of California, other State agencies, and the California legislature implemented several water conservation and management measures in response to a historic drought. A public review draft of proposed permanent state water conservation measures was published by five state agencies in November 2016. As stated on Draft EIR page 5.18-3, Section 5.18 of the Draft EIR updates the information in the 2011 WSA to

[2418] DPW 2017, p. ES-3
[2419] DRP 2017, Appendix 5.18-A
[2420] *Ibid*.

implement the recommendations in the peer review of the Project's water supply and demand assessment and to include the AVAP and General Plan Updates and related CEQA water supply analyses; the AVIRWMP; the approved Antelope Valley Basin Adjudication Judgment and Physical Solution for the Antelope Valley groundwater basin; the current AVEK UWMP; the DCR; and State drought emergency and proposed permanent water conservation measures.

The fact that the Superior Court entered a final Adjudication Judgment and Physical Solution for the Antelope Valley Basin Adjudication in December 2015 is discussed on Draft EIR pages 4-49, 5.2-15, 5.4-22, 5.18-14, 5.18-15, and 5.18-17 to 5.18-19. All Project groundwater use will comply with the Adjudication Judgment and Physical Solution.[2421] The Adjudication Judgment and Physical Solution was approved by the Court to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution also takes account of and avoids potential long-term, cumulative impacts to the Antelope Valley Basin. Section 1.5 of the Adjudication Judgment and Physical Solution states that after the Phase 3 trial of the proceedings, the Court determined that the safe yield of the Antelope Valley Basin is 110,000 acre-feet per year. Section 3.5.43 of the Adjudication Judgment and Physical Solution defines safe yield to mean the amount of annual extractions of water from the Basin over time equal to the amount of water needed to recharge the groundwater aquifer and maintain it in equilibrium, plus any temporary surplus. Section 3.4 of the Adjudication Judgment and Physical Solution states that the physical solution governs groundwater, imported water and Antelope Valley Basin storage space to ensure that the Antelope Valley Basin supports existing and future reasonable and beneficial uses. Exhibit 4 to the Adjudication Judgment and Physical Solution allocates overlying production rights in amounts consistent with the Basin's sustainable yield and provides that, after a 7-year rampdown period applicable to all basin groundwater users, the Tejon Ranch Company has an overlying production right of 1,634-acre feet per year, all of which will be provided to and utilized by the Project.

In addition, as discussed on Draft EIR pages 5.18-19 and 5.18-20, the Adjudication Judgment and Physical Solution provides that:

- Parties that import water through AVEK and that are identified on Exhibit 8 of the Adjudication Judgment and Physical Solution may produce return flows from imported water used for municipal and industrial purposes within the Antelope Valley Basin equal to 39 percent of the average amount of imported water used in the preceding five years. Parties that use imported water on lands outside the basin but within the basin watershed are entitled to produce return flows to the extent they can establish, to the satisfaction of the watermaster, that such return flows augment the basin groundwater supply. The Tejon Ranch Company and Tejon RanchCorp are included in Exhibit 8 of the Judgment and Physical Solution.
- All parties have the right to store water in the basin pursuant to a storage agreement with the watermaster. The Adjudication Judgment and Physical

[2421] *Id.,* Appendix 5.18-D

Solution does not limit or modify the operation of preexisting banking projects or the performance of preexisting exchange agreements, including existing water banks operated by the Tejon Ranch Company and Tejon RanchCorp.

- Unproduced portions of a groundwater allocation may be carried over for 10 years and stored after the carry-over period subject to the terms and conditions of a storage agreement approved by the watermaster.
- Pursuant to terms and conditions established by the watermaster and subject to hydrologic review by an engineer retained by the watermaster, a party may transfer all or any portion of its applicable groundwater production rights to another party so long as the transfer does not cause a material injury, as defined in the Judgment and Physical Solution.
- The Tejon Ranch Company and Tejon RanchCorp are included in the list of parties that conduct business and that may produce and transport groundwater for use on lands outside the basin and within the watershed of the basin, as shown in Exhibit 9 of the Judgment and Physical Solution.

Consequently, the Adjudication Judgment and Physical Solution was entered by the Court in December 2015, and addresses groundwater, return flow, water banking and other water rights in the Antelope Valley. The Draft EIR analysis of Project water supplies is fully consistent with and accurately accounts for the Adjudication Judgment and Physical Solution. The comment does not identify any substantive issue or concern with the analysis of Project water supplies, including water supplies subject to the Adjudication Judgment and Physical Solution.

Response to Comment F.8-220:

This comment cites a statement contained on page 26 of the 2008 Antelope Valley-East Kern Water Agency (AVEK) Urban Water Management Plan (UWMP).[2422] The comment also cites to a provision of the Water Code that applies to the development of UWMP by California water suppliers and not to a specific CEQA requirement.

As discussed on Draft EIR pages 5.18-2 and 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water Code by the Golden Valley Municipal Water District (GVMWD) in May 2011.[2423] In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan[2424] for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. In 2014 and 2015, the County of Los Angeles Board of Supervisors published the draft and certified Final Environmental Impact Reports (EIRs) for updates to the Antelope Valley Area Plan (AVAP) and to the County General Plan (General Plan Update) and approved the updated AVAP and General Plan Update. The approved General Plan Update incorporated the previously approved AVAP update, which reduced the level of future growth in

[2422] *Id.,* Appendix E of Appendix 5.18-A
[2423] *Id.,* Appendix 5.18-A
[2424] *Ibid*.

unincorporated portions of the Antelope Valley from levels that would have occurred under prior General Plan designations. Antelope Valley regional water supplies and demands were considered in the EIRs prepared for the AVAP and General Plan Updates. In 2013, a regional water users group in the Antelope Valley prepared an update to the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) in accordance with State law. In December 2015, the Superior Court of California approved an Adjudication Judgment and Physical Solution that regulates the Antelope Valley groundwater basin. In June 2016, AVEK adopted its current UWMP, and in June 2015, the California Department of Water Resources (DWR) published the current State Water Project (SWP) Delivery Capability Report (DCR), which includes the most recent analysis of SWP current and future reliability. From 2014 to 2016, the Governor of California, other State agencies, and the California legislature implemented several water conservation and management measures in response to a historic drought. A public review draft of proposed permanent state water conservation measures was published by five state agencies in November 2016. As stated on Draft EIR page 5.18-3, Section 5.18 of the Draft EIR updates the information in the 2011 WSA to implement the recommendations in the peer review of the Project's water supply and demand assessment and to include the AVAP and General Plan Updates and related CEQA water supply analyses; the AVIRWMP; the approved Antelope Valley Basin Adjudication Judgment and Physical Solution for the Antelope Valley groundwater basin; the current AVEK UWMP; the DCR; and State drought emergency and proposed permanent water conservation measures.

Water Code Section 10632(a) pertains to the inclusion in applicable UWMPs of an "urban water shortage contingency analysis" that includes elements "that are within the authority of the urban water supplier." The current AVEK UWMP was adopted in 2016 and reviewed and determined to be consistent with all Water Code requirements by the DWR in 2017. As stated in the AVEK UWMP,[2425] AVEK prepared the current UWMP in accordance with the DWR "2015 Urban Water Management Plans Guidebook for Urban Water Suppliers" (Guidebook) for a wholesale supplier. The DWR Guidebook[2426] states that Section 10632(a)(4) of the Water Code as cited in the comment applies to retail urban water providers and not to wholesale water suppliers.[2427] In addition, the Guidebook states that retail UWMPs "make their own determination as to which prohibitions, and which stage for each prohibition, are most appropriate for their service area" in compliance with Water Code Section 10632.[2428] Consequently, under current law and regulatory practice, and as reflected in the current AVEK UWMP, the provision cited in the comment is not applicable to a wholesale provider such as AVEK. To the extent the discussion of water shortage contingencies in the current AVEK UWMP required by current law and regulatory practice is relevant for CEQA purposes, Section 8 of the current UWMP, Water Shortage Contingency Planning, describes how the agency would reduce deliveries to customers by up to 50 percent in the event of water supply shortages in accordance with Water Code UWMP

2425 *Id.,* Appendix 5.18-F, p. 1-1

2426 California Department of Water Resources (DWR). 2016 (March). *2015 Urban Water Management Plans Guidebook for Urban Water Suppliers*. Sacramento, CA: DWR. http://www.water.ca.gov/urbanwatermanagement/docs/2015/UWMP_Guidebook_Mar_2016_FINAL.pdf.

2427 *Id.,* pp. 8-4 and -5

2428 *Id.,* p. 8-5

preparation requirements. As discussed in Draft EIR Section 5.18, and quantitatively analyzed in Draft EIR Tables 5.18-10 to 5.18-12 for normal or average, single-dry, and multiple-dry years, the Project analysis includes the potential reduction of up to 95 percent of imports provided by AVEK (a single year delivery of imported water of just 5 percent), and several other years in which deliveries would be lower than 50 percent of potential full amounts. The analysis shows that other sources of Project water supply are more than sufficient to meet demand during these drier periods when supplies imported by AVEK would be subject to reductions of up to 95 percent of potential full amounts.

Contrary to the comment, the Draft EIR includes mandatory and enforceable water conservation, monitoring and adaptive management measures. MM 18-1 requires the following water efficiency and conservation measures, all of which will be incorporated into the Mitigation Monitoring and Reporting Plan (MMRP) for the Project adopted and enforced by the County as required by CEQA:

1. The Project Applicant/Developer must comply with the water efficiency and conservation measures set forth in Divisions 4.3 and 5.3 of the California Green Building Standards (CALGreen) Code or the County Green Building Standards Code, whichever are more stringent.
2. The Project Applicant/Developer must install, maintain, and monitor all non-construction potable and non-potable water use using appropriate metering equipment throughout the site.
3. The Project Applicant/Developer must install, maintain, and operate on-site wastewater treatment and conveyance facilities that provide recycled water treated to California Title 22 unrestricted reuse standards from on-site wastewater and use recycled water to meet (i) 100 percent of commercial, business park, institutional, school, hotel, park, and slope irrigation demand and (ii) outdoor irrigation demand in 50 percent of the total very low and low density residential lot landscaped area.
4. The Project Applicant/Developer must require installation of water-efficient major appliances (washers, dryers, dishwashers) in compliance with the California Appliance Efficiency Regulations, Energy Star, or other applicable standards.
5. The Project Applicant/Developer must require the installation of irrigation equipment with a minimum 0.80 irrigation efficiency for all public and private park, recreation and entertainment land use, arterial roadway, and slope irrigation uses, the use of Water Smart/Evapotranspiration-based controllers, and the use of low water use plants and shrubs in all irrigated slope areas with an average plant factor of 0.2, as defined in the State Model Water Efficient Landscape Ordinance.
6. The Project Applicant/Developer must require that the Project Water Purveyor implement water budget based rates in compliance with all applicable legal requirements and in a manner consistent with the use of such rates by other water districts in California (e.g., Irvine Ranch Water

> District) to ensure that Project potable water use meets or exceeds the following standards and adjusted as may be required to meet more stringent standards that may be adopted by the State or Los Angeles County: (a) Residential indoor water use – 55 gallons per capita per day; (b) Commercial indoor water use – 200 gallons per day per thousand square feet; (c) Business Park indoor water use – 65 gallons per day per thousand square feet, including recycled water for commercial wastewater and cooling use except where prohibited by applicable law for particular types of areas or uses (e.g., employee cafeterias); (d) Institutional indoor water use – 50 gallons per day per thousand square feet; (e) Hotel indoor water use – 125 gallons per day per room; (f) Residential outdoor water use – 55 percent of the reference evapotranspiration rate for the Project site ; and (g) Commercial, industrial, and institutional outdoor use – 45 percent of the reference evapotranspiration rate for the Project site.

As discussed in Draft EIR Section 5.18, the analysis of project water supplies, even assuming demand above the levels in MM 18-1, such as indoor residential water use of 65 gallons per capita per day instead of 55 gallons per capita per day (the current state consumption target), shows that the Project's water supplies will sustainably meet post-buildout demand and maintain an average banked supply of 79,000 acre-feet over time. To provide an additional level of assurance that Project supplies will meet demand, MM 18-2 requires implementation of water use monitoring and reporting, including the submission of water use reports to the County at the end of the 5th and 10th years or the occupancy of the 4,000th and 10,000th units, whichever occurs latest, to confirm that the water use efficiencies discussed in the Draft EIR are being achieved as the Project is built and that available water supplies are sufficient to meet future demand. This additional analysis must occur at Project development milestones that are approximately 25 and 50 percent of buildout levels. If a report determines that water use is exceeding projected levels, the Project Water Purveyor must identify specific response measures to ensure that water supplies will meet future demand. Potential sources of additional supply, if necessary, are discussed on pages 5.18-69 to 5.18-72 of the Draft EIR and include potential groundwater transfers as allowed by the Adjudication Judgment and Physical Solution, supplemental surface water purchases and imports, and investments in additional recycled water use or storm water reuse in the Antelope Valley. No additional development will occur until sufficient supplies are identified for the Project. MM 18-2 will be incorporated into the MMRP for the Project adopted and enforced by the County as required by CEQA.

The Draft EIR analysis shows that Project water supplies are sufficient to meet construction period, buildout, and post-buildout demands on a sustainable basis while retaining an average of over 79,000 acre-feet of reserve supplies in the Project water banks—or approximately 11 years of full buildout potable supply—over time. The Project is required to implement significant and substantial water conservation measures in accordance with MM 18-1 that will be included in the MMRP and enforceable by the County. MM 18-2 provides an additional level of assurance that projected supplies and demands will be achieved at two milestones in the Project development process (approximately 25 and 50 percent of full buildout) and prohibits further development until any identified excess

demand or insufficient supply issues are resolved to the satisfaction of the County. The comment does not identify any substantive issues or concerns with the analysis of Project water supplies, including the mandatory and enforceable water conservation, monitoring and adaptive management mitigation measures applicable to the Project.

As discussed on Draft EIR page 5.18-3, the Project's water facilities will be owned and operated by a Public Water Purveyor or organized as a Community Services District, a statutory water district or PUD with the appropriate capacity to own, operate, and maintain the Project's water system. The Project Water Purveyor will be funded through a rate-payer system and fees. Until the Project Water Purveyor is established, the Project Applicant/Developer will be responsible for all Project- related water services. All of the Project's water supplies and the design, permitting, financing and construction of all treatment, collection and distribution infrastructure will be provided by the Project Applicant/Developer. The Project Water Purveyor will be subject to the UWMP preparation requirements of Water Code Sections 10610 et seq. and will also be required to meet the retail UWMP provisions of the Water Code as set forth in the Guidelines. These requirements will include the applicable provisions of Water Code Section 10632 pertaining to the analysis of urban water shortage contingencies.

Response to Comment F.8-221:

This comment inaccurately states that the Project will use "Nickel water" to meet any of the Project's projected demand and appears to reference tables in Draft EIR Appendix 5.18-A in support of this incorrect statement. As discussed on Draft EIR pages 5.18-2 and 5.18-3, a Water Supply Assessment (WSA) for the Project was approved in accordance with Sections 10910 et seq. of the California Water Code by the Golden Valley Municipal Water District (GVMWD) in May 2011.[2429] In January 2017, the Potable Water, Wastewater, and Recycled Water Demands and System Plan[2430] for the Project was peer reviewed by Kennedy/Jenks in a report submitted to the County. In 2014 and 2015, the County of Los Angeles Board of Supervisors published the draft and certified Final Environmental Impact Reports (EIRs) for updates to the Antelope Valley Area Plan (AVAP) and to the County General Plan (General Plan Update) and approved the updated AVAP and General Plan Update. The approved General Plan Update incorporated the previously approved AVAP update, which reduced the level of future growth in unincorporated portions of the Antelope Valley from levels that would have occurred under prior General Plan designations. Antelope Valley regional water supplies and demands were considered in the EIRs prepared for the AVAP and General Plan Updates. In 2013, a regional water users group in the Antelope Valley prepared an update to the Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) in accordance with State law. In December 2015, the Superior Court of California approved an Adjudication Judgment and Physical Solution that regulates the Antelope Valley groundwater basin. In June 2016, AVEK adopted its current UWMP, and in June 2015, the California Department of Water Resources (DWR) published the current State Water Project (SWP) Delivery Capability Report (DCR), which includes the most recent analysis of SWP current and future reliability. From 2014 to 2016, the Governor of California, other State agencies, and the

[2429] DRP 2017, Appendix 5.18-A
[2430] *Ibid*.

California legislature implemented several water conservation and management measures in response to a historic drought. A public review draft of proposed permanent state water conservation measures was published by five state agencies in November 2016. As stated on Draft EIR page 5.18-3, Section 5.18 of the Draft EIR updates the information in the 2011 WSA to implement the recommendations in the peer review of the Project's water supply and demand assessment and to include the AVAP and General Plan Updates and related CEQA water supply analyses; the AVIRWMP; the approved Antelope Valley Basin Adjudication Judgment and Physical Solution for the Antelope Valley groundwater basin; the current AVEK UWMP; the DCR; and State drought emergency and proposed permanent water conservation measures.

As discussed on Draft EIR pages 3-7, 5.18-61, and 5.18-62, during 2008 and 2009, the Tejon Ranch Company (TRC) agreed to loan certain water supplies to AVEK for return in later years pursuant to exchange agreements with AVEK. The supplies loaned to AVEK include 8,393 acre-feet of water purchased by TRC from the Nickel Family, LLC in 2008 and 6,893 acre feet of water purchased by TRC from Nickel Family, LLC in 2009. These transactions have occurred, and the applicable supplies were provided to AVEK nearly a decade ago. No other water related to supplies currently or formerly owned by the Nickel Family, LLC will be used for Project purposes in any way.

AVEK is obligated to return 1.5 times the amount of the 2008 and 2009 water supplies provided by TRC under the agency's agreements with TRC. The remaining balance of water that AVEK is required to return to TRC under these agreements is 13,595 acre-feet. TRC has also participated in an in-lieu program administered by AVEK under which AVEK provides surface supplies in future wetter years in exchange for TRC using groundwater and foregoing SWP deliveries in prior dry years. The amount of water that AVEK is required to supply to TRC under the in-lieu program is 13,032 acre-feet. In 2007 and 2008, TRC purchased 2,362 acre-feet of water from AVEK for future delivery. For ease of reference, the AVEK water return obligations under the 2008 and 2009 agreements, the in-lieu program, and the 2007 and 2008 purchases by TRC are collectively referred to as "AVEK Call Water" in the Draft EIR. The total amount of AVEK Call Water available for Project use is 28,989 acre feet. As shown in Draft EIR Table 5.18-10, the AVEK Call Water is used as part of the Project's reserve supply, and delivery is assumed to occur on a pro-rata basis over 20 average water years. The actual delivery timing can be flexibly arranged with AVEK to reflect the agency's available supplies from year to year. The Project's water supply and demand projections assume that no AVEK Call Water would be supplied in either a single-dry year or during multiple-dry year droughts.[2431]

Consequently, no Nickel water will be used by the Project and no analysis of potential impacts related to the potential use of Nickel water is required.

Response to Comment F.8-222:

This comment does not address any specific element of the Project's water supply analysis, including climate change, and will be included in the record for consideration by the Regional

[2431] *Id.,* Tables 5.18-11 and 5.18-12

Planning Commission and Board of Supervisors. The Draft EIR includes an extensive discussion of potential climate change impacts, including in Draft EIR Section 1.6.21, Section 5.21, and on pages 5.18-27 and 5.18-28 in Draft EIR Section 5.18. The Draft EIR states on page 5.18-27 that climate change may increase water supply uncertainties, including the reliability of SWP deliveries, by affecting the frequency, magnitude, and duration of extreme storm events and by reducing annual snowpack storage. Rising sea levels would also increase the risk of coastal flooding, Delta levee integrity, and water quality. Adverse changes in Delta water quality due to sea level rise, levee failures, more frequent and intense rainfall patterns and droughts could further constrain SWP exports.

As discussed on pages Draft EIR 5.18-27 and 5.18-28 the analysis of the Project's imported water supplies is based on the most current State Water Project Delivery Capability Report (DCR) prepared by the California Department of Water Resources (DWR), the state agency that owns operates the State Water Project (SWP). As stated in the DCR, since 2003 the DWR has been legally obligated to "prepare and deliver to all State Water Project (SWP) contractors, all city and county planning departments, and all regional and metropolitan planning departments within the project service area a report which accurately sets forth, under a range of hydrologic conditions, the then existing overall delivery capability of the project facilities and the allocation of that capacity to each contractor." As discussed in Draft EIR Section 5.18, the Project analysis uses the more conservative ELT delivery reliability scenario in the DCR rather than the DCR base scenario, because the ELT scenario incorporates much more significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. The analysis of Project imported water supplies is also consistent with and based on the analysis prepared by AVEK in the agency's current UWMP.[2432] The UWMP was approved by AVEK in 2016 and was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. AVEK is one of 29 SWP contractors with the DWR in California, and imports SWP water used in the Antelope Valley basin, including all of the SWP system supplies that the Project will use. The UWMP considered all of the scenarios presented by the DWR in the DCR and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2433] In addition, the UWMP used a single-dry year SWP allocation level of 5 percent, lower than used in the DCR ELT analysis, to reflect the historically low allocation in 2014. The Project water supply analysis incorporates the lower single-dry year delivery level and the 1990 to 1992 drought period delivery levels used in the AVEK UWMP and is more conservative than the DCR ELT scenario. In January 2017, at the request of the County, Kennedy-Jenks, a leading California water engineering company, provided a peer review report of the Project's water supply and demand analysis.[2434] The report concluded that the Draft EIR "correctly uses the ELT scenario to estimate future SWP supply availability from AVEK because it is based on existing facilities and regulatory constraints, with hydrology adjusted for the expected effects of climate change." The report

[2432] *Id.,* Appendix 5.18-F
[2433] *Id.,* Appendix 5.18-F, p. 6-1
[2434] *Id.,* Appendix 5.18-G

also recommended that to be consistent with the AVEK UWMP, the Project analysis include a single-dry year SWP amount of 5 percent, which was implemented for the Project.[2435]

All Project use of groundwater, imported water return flow production, and water banking use will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution.[2436] The Adjudication Judgment and Physical Solution was approved by the California Superior Court in December 2015 to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution represents the best available information about and the legal framework governing the avoidance of potential long-term, cumulative impacts to the Antelope Valley Basin, including impacts that could occur from climate change. The fact that the Adjudication Judgment and Physical Solution takes account of and avoids potential long-term and cumulative impacts to the Antelope Valley Basin is recognized in the 2014 California Sustainable Groundwater Management Act, which requires, for the first time in state history, that certain medium and high priority groundwater basins implement a plan to sustainably manage groundwater over time. Section 10720.8(b) of the Act specifically exempts the Antelope Valley from these requirements upon the approval of the Adjudication Judgment and Physical Solution. Section 10720.8 also exempts other adjudicated basins throughout the state. These exemptions demonstrate that an adjudication judgment, including the Antelope Valley Basin Adjudication Judgment and Physical Solution, accounts for and allocates water uses, avoids groundwater impacts, including long term, cumulative impacts that could be affected by climate chance, and ensures that groundwater use will be sustainable over time.

The fact that the ELT scenario includes a substantial analysis of climate change is specifically cited as the rationale for using the ELT scenario as stated on Draft EIR pages 5.18-27 and 5.18-28, on page 7-7 of Draft EIR Appendix 5.19-A, and in the AVEK UWMP.[2437] The following discussion summarizes the climate change factors included in the ELT scenario by the DWR in the current DCR.

The DCR states that the climate change methodologies used in the ELT scenario are described in Appendix 5.A.2 (Climate Change Approach and Implications for Aquatic Species) of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2438] As discussed on Draft EIR page 5.18-26, the BDCP is a comprehensive plan prepared by local water agencies, environmental and conservation organizations, State and federal agencies, and other stakeholders to implement a suite of habitat restoration measures, other Delta water quality and habitat stressor reduction activities, and water operations criteria that will facilitate the issuance of long-term permits to operate the SWP and other projects and water operations in the Delta. Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the

[2435] *Id.,* Appendix 5.18-G, p. 18
[2436] *Id.,* Appendix 5.18-D
[2437] *Id.,* Appendix 5.18-F, p. 6-1
[2438] BDCP 2014

participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Service, the World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2439]

As stated on BDCP Appendix 5.A.2, page 5.A.2-8, natural hydrological variability is often greater than the magnitude of climate change expected over several decades. This requires the use of sophisticated computer models to combine the potential climate change "signal"—the effects on water resources caused by climate change—with the range of natural variability observed in the historical record. In addition, as stated on BDCP Appendix 5.A.2, page 5.A.2-2, global climate models continue to exhibit substantial uncertainty, especially a regional level of analysis. The coarse scale of global climate models requires that results must be "downscaled" and bias corrected for use in the analysis of hydrological impacts at a regional or watershed level. BDCP Appendix 5.A.2 states that the dynamic or statistical methods used for downscaling add another source of uncertainty to the climate change projections.

To address these significant analytical concerns, the DWR, in consultation with multiple state and federal agencies, used a total of 112 IPCC future climate projections that were bias-corrected and statistically downscaled by the Lawrence Livermore National Laboratory under the World Climate Research Program's Coupled Model Intercomparison Project Phase 3 (CMIP3). In order to incorporate both the climate change signal and the natural variability in the longer-term observed record, an expanded time series was used that allows use of the long-term observed records consistent with hydrological and climate change analyses of the Pacific Northwest, the Lower Colorado River, in Texas and in recent Bureau of Reclamation analyses. This approach is called quantile mapping and maps the statistical properties of climate variables from one data subset with the time series of events from a different subset. As summarized on BDCP Appendix 5.A.2, page 5.A.2-8, the quantile mapping approach involves the following steps:

(1) Extract a 30-year slice of downscaled climate projections based on the climate model ensemble subset for the quadrant of interest and centered on the year of investigation (e.g., 2025 or 2060);

(2) For each calendar month (e.g., January) of the future period, determine the statistical properties of temperature and precipitation at each grid cell;

(3) For each calendar month of the historical period determine the statistical properties of temperature and precipitation at each grid cell;

(4) Develop quantile maps between the historical observed statistical properties and the future downscaled climate statistical properties such

[2439] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

that the entire probability distribution (including means, variance, skew, etc.) at the monthly scale is transformed to reflect the climate scenario;

(5) Using the quantile maps, redevelop a monthly time series of temperature and precipitation over the observed period that incorporates the climate shift of the future period; and

(6) Convert monthly time series to a daily time series by scaling monthly values to daily sequence found in the observed record.

The quantile mapping approach generates a monthly or daily time series of temperature and precipitation that has the range of variability observed in the historical record, but also contains the shift in climate properties (both mean and expanded variability) found in the downscaled climate projections. These data were used as inputs to the Variable Infiltration Capacity (VIC) model, which is a hydrologic model that simulates streamflow from rainfall in each watershed, and the streamflow outputs from the VIC model were used as inputs to the SWP (and federal water system) operations models and water quality and water temperature models. CALSIM II, the most current available long-term model of California hydrology, was used to simulate the response of California's river-reservoir conveyance system to climate change.

BDCP Appendix 5.4.A also provides a detailed discussion of the use of a 15-centimeter sea level rise in the ELT scenario. As discussed on BDCP Appendix 5.A.2, page 5.A.2-10, there remains considerable uncertainty in the projections and the state of sea level rise science. A 15-centimeter sea level rise in the ELT scenario was used in the analysis because it represents that mid-range of the available estimates for California water resources facilities during the applicable time period.

Consequently, the Draft EIR includes an extensive and thorough analysis of potential climate change impacts, including potential climate change impacts on water supplies. The analysis methodology has been subject to substantial public and state and federal agency review, and BDCP Appendix 5.4.A has been publicly available since at least 2013. The climate change analysis incorporated into the ELT accounts for the substantial and ongoing uncertainties in the analysis of climate change and water supply planning, including uncertainties about the magnitude and timing of potential sea level increases, the fact that natural climate variability is often much greater than the projected climate change "signals" or effects suggested by a model, and the uncertainties created by downscaling and bias adjusting global climate models for use on regional scales of analysis. The ELT scenario was developed in the DCR by the DWR, the owner and operator of the SWP, which has a legal obligation to analyze the reliability of SWP supplies on a biannual basis. AVEK, the largest SWP importer in the Antelope Valley, and one of only 29 statewide SWP system contractors, considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate

change".[2440] The current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site is also based on the ELT projections in the AVEK UWMP.[2441]

Response to Comment F.8-223:

This comment does not address any specific element of the Project's water supply analysis, including climate change, and will be included in the record for consideration by the Regional Planning Commission and Board of Supervisors. The Draft EIR includes an extensive discussion of potential climate change impacts, including in Draft EIR Section 1.6.21, Section 5.21, and on pages 5.18-27 and 5.18-28 in Draft EIR Section 5.18. The Draft EIR states on page 5.18-27 that climate change may increase water supply uncertainties, including the reliability of SWP deliveries, by affecting the frequency, magnitude, and duration of extreme storm events and by reducing annual snowpack storage. Rising sea levels would also increase the risk of coastal flooding, Delta levee integrity, and water quality. Adverse changes in Delta water quality due to sea level rise, levee failures, more frequent and intense rainfall patterns and droughts could further constrain SWP exports.

As discussed on Draft EIR pages 5.18-27 and 5.18-28 the analysis of the Project's imported water supplies is based on the most current State Water Project Delivery Capability Report (DCR) prepared by the California Department of Water Resources (DWR), the state agency that owns operates the State Water Project (SWP). As stated in the DCR, since 2003 the DWR has been legally obligated to "prepare and deliver to all State Water Project (SWP) contractors, all city and county planning departments, and all regional and metropolitan planning departments within the project service area a report which accurately sets forth, under a range of hydrologic conditions, the then existing overall delivery capability of the project facilities and the allocation of that capacity to each contractor." As discussed in Draft EIR Section 5.18, the Project analysis uses the more conservative ELT delivery reliability scenario in the DCR rather than the DCR base scenario, because the ELT scenario incorporates much more significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. The analysis of Project imported water supplies is also consistent with and based on the analysis prepared by AVEK in the agency's current UWMP.[2442] The UWMP was approved by AVEK in 2016 and was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. AVEK is one of 29 SWP contractors with the DWR in California, and imports SWP water used in the Antelope Valley basin, including all of the SWP system supplies that the project will use. The UWMP considered all of the scenarios presented by the DWR in the DCR and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2443] In addition, the UWMP used a single-dry year SWP

[2440] DRP 2017, Appendix 5.18-F, p. 6-1
[2441] DPW 2017, p. 5-1
[2442] DRP 2017, Appendix 5.18-F
[2443] *Id.,* Appendix 5.18-F, p. 6-1

allocation level of 5 percent, lower than used in the DCR ELT analysis, to reflect the historically low allocation in 2014. The project water supply analysis incorporates the lower single-dry year delivery level and the 1990 to 1992 drought period delivery levels used in the AVEK UWMP and is more conservative than the DCR ELT scenario. In January 2017, at the request of the County, Kennedy-Jenks, a leading California water engineering company, provided a peer review report of the Project's water supply and demand analysis.[2444] The report concluded that the Draft EIR "correctly uses the ELT scenario to estimate future SWP supply availability from AVEK because it is based on existing facilities and regulatory constraints, with hydrology adjusted for the expected effects of climate change." The report also recommended that to be consistent with the AVEK UWMP, the Project analysis include a single-dry year SWP amount of 5 percent, which was implemented for the Project.[2445]

All Project use of groundwater, imported water return flow production, and water banking use will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution.[2446] The Adjudication Judgment and Physical Solution was approved by the California Superior Court in December 2015 to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution represents the best available information about and the legal framework governing the avoidance of potential long-term, cumulative impacts to the Antelope Valley Basin, including impacts that could occur from climate change. The fact that the Adjudication Judgment and Physical Solution takes account of and avoids potential long-term and cumulative impacts to the Antelope Valley Basin is recognized in the 2014 California Sustainable Groundwater Management Act, which requires, for the first time in state history, that certain medium and high priority groundwater basins implement a plan to sustainably manage groundwater over time. Section 10720.8(b) of the Act specifically exempts the Antelope Valley from these requirements upon the approval of the Adjudication Judgment and Physical Solution. Section 10720.8 also exempts other adjudicated basins throughout the state. These exemptions demonstrate that an adjudication judgment, including the Antelope Valley Basin Adjudication Judgment and Physical Solution, accounts for and allocates water uses, avoids groundwater impacts, including long term, cumulative impacts that could be affected by climate chance, and ensures that groundwater use will be sustainable over time.

The fact that the ELT scenario includes a substantial analysis of climate change is specifically cited as the rationale for using the ELT scenario as stated on Draft EIR pages 5.18-27 and 5.18-28, on page 7-7 of Draft EIR Appendix 5.19-A, and in the AVEK UWMP.[2447] The following discussion summarizes the climate change factors included in the ELT scenario by the DWR in the current DCR.

The DCR states that the climate change methodologies used in the ELT scenario are described in Appendix 5.A.2 (Climate Change Approach and Implications for Aquatic Species) of the public review documents prepared and published for the proposed Bay Delta

[2444] *Id.,* Appendix 5.18-G
[2445] *Id.,* Appendix 5.18-G, p. 18
[2446] *Id.,* Appendix 5.18-D
[2447] *Id.,* Appendix 5.18-F, p. 6-1

Conservation Plan (BDCP).[2448] As discussed on Draft EIR page 5.18-26, the BDCP is a comprehensive plan prepared by local water agencies, environmental and conservation organizations, State and federal agencies, and other stakeholders to implement a suite of habitat restoration measures, other Delta water quality and habitat stressor reduction activities, and water operations criteria that will facilitate the issuance of long-term permits to operate the SWP and other projects and water operations in the Delta. Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Service, the World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2449] The references include three publications by the author cited in the comment.

As stated on BDCP Appendix 5.A.2, page 5.A.2-8, natural hydrological variability is often greater than the magnitude of climate change expected over several decades. This requires the use of sophisticated computer models to combine the potential climate change "signal"—the effects on water resources caused by climate change—with the range of natural variability observed in the historical record. In addition, as stated on BDCP Appendix 5.A.2, page 5.A.2-2, global climate models continue to exhibit substantial uncertainty, especially at regional levels of analysis. The coarse scale of global climate models requires that results must be "downscaled" and bias corrected for use in the analysis of hydrological impacts at a regional or watershed level. BDCP Appendix 5.A.2 states that the dynamic or statistical methods used for downscaling add another source of uncertainty to the climate change projections.

To address these significant analytical concerns, the DWR, in consultation with multiple state and federal agencies, used a total of 112 IPCC future climate projections that were bias-corrected and statistically downscaled by the Lawrence Livermore National Laboratory under the World Climate Research Program's Coupled Model Intercomparison Project Phase 3 (CMIP3). In order to incorporate both the climate change signal and the natural variability in the longer-term observed record, an expanded time series was used that allows use of the long-term observed records consistent with hydrological and climate change analyses of the Pacific Northwest, the Lower Colorado River, in Texas and in recent Bureau of Reclamation analyses. This approach is called quantile mapping and maps the statistical properties of climate variables from one data subset with the time series of events from a different subset. As summarized on BDCP Appendix 5.A.2, page 5.A.2-8, the quantile mapping approach involves the following steps:

[2448] BDCP 2014

[2449] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

(1) Extract a 30-year slice of downscaled climate projections based on the climate model ensemble subset for the quadrant of interest and centered on the year of investigation (e.g., 2025 or 2060);

(2) For each calendar month (e.g., January) of the future period, determine the statistical properties of temperature and precipitation at each grid cell;

(3) For each calendar month of the historical period determine the statistical properties of temperature and precipitation at each grid cell;

(4) Develop quantile maps between the historical observed statistical properties and the future downscaled climate statistical properties such that the entire probability distribution (including means, variance, skew, etc.) at the monthly scale is transformed to reflect the climate scenario;

(5) Using the quantile maps, redevelop a monthly time series of temperature and precipitation over the observed period that incorporates the climate shift of the future period; and

(6) Convert monthly time series to a daily time series by scaling monthly values to daily sequence found in the observed record.

The quantile mapping approach generates a monthly or daily time series of temperature and precipitation that has the range of variability observed in the historical record, but also contains the shift in climate properties (both mean and expanded variability) found in the downscaled climate projections. These data were used as inputs to the Variable Infiltration Capacity (VIC) model, which is a hydrologic model that simulates streamflow from rainfall in each watershed, and the streamflow outputs from the VIC model were used as inputs to the SWP (and federal water system) operations models and water quality and water temperature models. CALSIM II, the most current available long-term model of California hydrology, was used to simulate the response of California's river-reservoir conveyance system to climate change.

BDCP Appendix 5.4.A also provides a detailed discussion of the use of a 15-centimeter sea level rise in the ELT scenario. As discussed on BDCP Appendix 5.A.2, page 5.A.2-10, there remains considerable uncertainty in the projections and the state of sea level rise science. A 15-centimeter sea level rise in the ELT scenario was used in the analysis because it represents that mid-range of the available estimates for California water resources facilities during the applicable time period.

Consequently, the Draft EIR includes an extensive and thorough analysis of potential climate change impacts, including potential climate change impacts on water supplies. The analysis methodology has been subject to substantial public and state and federal agency review, and BDCP Appendix 5.4.A has been publicly available since at least 2013. The climate change analysis incorporated into the ELT accounts for the substantial and ongoing uncertainties in the analysis of climate change and water supply planning, including uncertainties about the magnitude and timing of potential sea level increases, the fact that natural climate variability is often much greater than the projected climate change "signals" or effects suggested by a

model, and the uncertainties created by downscaling and bias adjusting global climate models for use on regional scales of analysis. The ELT scenario was developed in the DCR by the DWR, the owner and operator of the SWP, which has a legal obligation to analyze the reliability of SWP supplies on a biannual basis. AVEK, the largest SWP importer in the Antelope Valley, and one of only 29 statewide SWP system contractors, considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2450] The current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site is also based on the ELT projections in the AVEK UWMP.[2451]

Response to Comment F.8-224:

This comment does not address any specific element of the Project's water supply analysis, including climate change, and will be included in the record for consideration by the Regional Planning Commission and Board of Supervisors. The Draft EIR includes an extensive discussion of potential climate change impacts, including in Draft EIR Section 1.6.21, Section 5.21, and on pages 5.18-27 and 5.18-28 in Draft EIR Section 5.18. The Draft EIR states on page 5.18-27 that climate change may increase water supply uncertainties, including the reliability of SWP deliveries, by affecting the frequency, magnitude, and duration of extreme storm events and by reducing annual snowpack storage. Rising sea levels would also increase the risk of coastal flooding, Delta levee integrity, and water quality. Adverse changes in Delta water quality due to sea level rise, levee failures, more frequent and intense rainfall patterns and droughts could further constrain SWP exports.

As discussed on Draft EIR pages 5.18-27 and 5.18-28, the analysis of the Project's imported water supplies is based on the most current State Water Project Delivery Capability Report (DCR) prepared by the California Department of Water Resources (DWR), the state agency that owns operates the State Water Project (SWP). As stated in the DCR, since 2003 the DWR has been legally obligated to "prepare and deliver to all State Water Project (SWP) contractors, all city and county planning departments, and all regional and metropolitan planning departments within the project service area a report which accurately sets forth, under a range of hydrologic conditions, the then existing overall delivery capability of the project facilities and the allocation of that capacity to each contractor." As discussed in Draft EIR Section 5.18, the Project analysis uses the more conservative ELT delivery reliability scenario in the DCR rather than the DCR base scenario, because the ELT scenario incorporates much more significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. The analysis of Project imported water supplies is also consistent with and based on the analysis prepared by AVEK in the agency's current UWMP.[2452] The UWMP was approved by AVEK in 2016 and was reviewed and determined to meet all California Water Code

[2450] DRP 2017, Appendix 5.18-F, p. 6-1
[2451] DPW 2017, p. 5-1
[2452] DRP 2017, Appendix 5.18-F

requirements by the California Department of Water Resources in March 2017. AVEK is one of 29 SWP contractors with the DWR in California, and imports SWP water used in the Antelope Valley basin, including all of the SWP system supplies that the Project will use. The UWMP considered all of the scenarios presented by the DWR in the DCR and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2453] In addition, the UWMP used a single-dry year SWP allocation level of 5 percent, lower than used in the DCR ELT analysis, to reflect the historically low allocation in 2014. The Project water supply analysis incorporates the lower single-dry year delivery level and the 1990 to 1992 drought period delivery levels used in the AVEK UWMP and is more conservative than the DCR ELT scenario. In January 2017, at the request of the County, Kennedy-Jenks, a leading California water engineering company, provided a peer review report of the Project's water supply and demand analysis.[2454] The report concluded that the Draft EIR "correctly uses the ELT scenario to estimate future SWP supply availability from AVEK because it is based on existing facilities and regulatory constraints, with hydrology adjusted for the expected effects of climate change." The report also recommended that to be consistent with the AVEK UWMP, the Project analysis include a single-dry year SWP amount of 5 percent, which was implemented for the Project.[2455]

All Project use of groundwater, imported water return flow production, and water banking use will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution.[2456] The Adjudication Judgment and Physical Solution was approved by the California Superior Court in December 2015 to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution represents the best available information about and the legal framework governing the avoidance of potential long-term, cumulative impacts to the Antelope Valley Basin, including impacts that could occur from climate change. The fact that the Adjudication Judgment and Physical Solution takes account of and avoids potential long-term and cumulative impacts to the Antelope Valley Basin is recognized in the 2014 California Sustainable Groundwater Management Act, which requires, for the first time in state history, that certain medium and high priority groundwater basins implement a plan to sustainably manage groundwater over time. Section 10720.8(b) of the Act specifically exempts the Antelope Valley from these requirements upon the approval of the Adjudication Judgment and Physical Solution. Section 10720.8 also exempts other adjudicated basins throughout the state. These exemptions demonstrate that an adjudication judgment, including the Antelope Valley Basin Adjudication Judgment and Physical Solution, accounts for and allocates water uses, avoids groundwater impacts, including long term, cumulative impacts that could be affected by climate chance, and ensures that groundwater use will be sustainable over time.

[2453] *Id.,* Appendix 5.18-F, p. 6-1
[2454] *Id.,* Appendix 5.18-G
[2455] *Id.,* Appendix 5.18-G, p. 18
[2456] *Id.,* Appendix 5.18-D

The fact that the ELT scenario includes a substantial analysis of climate change is specifically cited as the rationale for using the ELT scenario as stated on Draft EIR pages 5.18-27 and 5.18-28, on page 7-7 of Draft EIR Appendix 5.19-A, and in the AVEK UWMP.[2457] The following discussion summarizes the climate change factors included in the ELT scenario by the DWR in the current DCR.

The DCR states that the climate change methodologies used in the ELT scenario are described in Appendix 5.A.2, Climate Change Approach and Implications for Aquatic Species, of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2458] As discussed on Draft EIR page 5.18-26, the BDCP is a comprehensive plan prepared by local water agencies, environmental and conservation organizations, State and federal agencies, and other stakeholders to implement a suite of habitat restoration measures, other Delta water quality and habitat stressor reduction activities, and water operations criteria that will facilitate the issuance of long-term permits to operate the SWP and other projects and water operations in the Delta. Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Service, the World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2459]

As stated on BDCP Appendix 5.A.2, page 5.A.2-8, natural hydrological variability is often greater than the magnitude of climate change expected over several decades. This requires the use of sophisticated computer models to combine the potential climate change "signal"—the effects on water resources caused by climate change—with the range of natural variability observed in the historical record. In addition, as stated on BDCP Appendix 5.A.2, page 5.A.2-2, global climate models continue to exhibit substantial uncertainty, especially a regional level of analysis. The coarse scale of global climate models requires that results must be "downscaled" and bias corrected for use in the analysis of hydrological impacts at a regional or watershed level. BDCP Appendix 5.A.2 states that the dynamic or statistical methods used for downscaling add another source of uncertainty to the climate change projections.

To address these significant analytical concerns, the DWR, in consultation with multiple state and federal agencies, used a total of 112 IPCC future climate projections that were bias-corrected and statistically downscaled by the Lawrence Livermore National Laboratory under the World Climate Research Program's Coupled Model Intercomparison Project Phase 3 (CMIP3). In order to incorporate both the climate change signal and the natural variability in the longer-term observed record, an expanded time series was used that allows use of the

[2457] *Id.,* Appendix 5.18-F, p. 6-1

[2458] BDCP 2014

[2459] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

long-term observed records consistent with hydrological and climate change analyses of the Pacific Northwest, the Lower Colorado River, in Texas and in recent Bureau of Reclamation analyses. This approach is called quantile mapping and maps the statistical properties of climate variables from one data subset with the time series of events from a different subset. As summarized on BDCP Appendix 5.A.2, page 5.A.2-8, the quantile mapping approach involves the following steps:

(1) Extract a 30-year slice of downscaled climate projections based on the climate model ensemble subset for the quadrant of interest and centered on the year of investigation (e.g., 2025 or 2060);

(2) For each calendar month (e.g., January) of the future period, determine the statistical properties of temperature and precipitation at each grid cell;

(3) For each calendar month of the historical period determine the statistical properties of temperature and precipitation at each grid cell;

(4) Develop quantile maps between the historical observed statistical properties and the future downscaled climate statistical properties such that the entire probability distribution (including means, variance, skew, etc.) at the monthly scale is transformed to reflect the climate scenario;

(5) Using the quantile maps, redevelop a monthly time series of temperature and precipitation over the observed period that incorporates the climate shift of the future period; and

(6) Convert monthly time series to a daily time series by scaling monthly values to daily sequence found in the observed record.

The quantile mapping approach generates a monthly or daily time series of temperature and precipitation that has the range of variability observed in the historical record, but also contains the shift in climate properties (both mean and expanded variability) found in the downscaled climate projections. These data were used as inputs to the Variable Infiltration Capacity (VIC) model, which is a hydrologic model that simulates streamflow from rainfall in each watershed, and the streamflow outputs from the VIC model were used as inputs to the SWP (and federal water system) operations models and water quality and water temperature models. CALSIM II, the most current available long-term model of California hydrology, was used to simulate the response of California's river-reservoir conveyance system to climate change.

BDCP Appendix 5.4.A also provides a detailed discussion of the use of a 15-centimeter sea level rise in the ELT scenario. As discussed on BDCP Appendix 5.A.2, page 5.A.2-10, there remains considerable uncertainty in the projections and the state of sea level rise science. A 15-centimeter sea level rise in the ELT scenario was used in the analysis because it represents that mid-range of the available estimates for California water resources facilities during the applicable time period. As summarized on pages 5.A.2.0-1 and 5.A.2.0-2 of BDCP Appendix 5.4.A the analysis results include consideration of climate change effects on peak

flow, flooding periods, water quality, including salinity, water temperature, and other potential impacts on SWP and federal water system volumes and impacts to aquatic species.

Consequently, the Draft EIR includes an extensive and thorough analysis of potential climate change impacts, including potential climate change impacts on water supplies. The analysis methodology has been subject to substantial public and state and federal agency review, and BDCP Appendix 5.4.A has been publicly available since at least 2013. The climate change analysis incorporated into the ELT accounts for the substantial and ongoing uncertainties in the analysis of climate change and water supply planning, including uncertainties about the magnitude and timing of potential sea level increases, the fact that natural climate variability is often much greater than the projected climate change "signals" or effects suggested by a model, and the uncertainties created by downscaling and bias adjusting global climate models for use on regional scales of analysis. The ELT scenario was developed in the DCR by the DWR, the owner and operator of the SWP, which has a legal obligation to analyze the reliability of SWP supplies on a biannual basis. AVEK, the largest SWP importer in the Antelope Valley, and one of only 29 statewide SWP system contractors, considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2460] The current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site is also based on the ELT projections in the AVEK UWMP.[2461]

Response to Comment F.8-225:

This comment does not address any specific element of the Project's water supply analysis, including climate change, and will be included in the record for consideration by the Regional Planning Commission and Board of Supervisors. The Draft EIR includes an extensive discussion of potential climate change impacts, including in Draft EIR Section 1.6.21, Section 5.21, and on pages 5.18-27 and 5.18-28 in Draft EIR Section 5.18. The Draft EIR states on page 5.18-27 that climate change may increase water supply uncertainties, including the reliability of SWP deliveries, by affecting the frequency, magnitude, and duration of extreme storm events and by reducing annual snowpack storage. Rising sea levels would also increase the risk of coastal flooding, Delta levee integrity, and water quality. Adverse changes in Delta water quality due to sea level rise, levee failures, more frequent and intense rainfall patterns and droughts could further constrain SWP exports.

As discussed on Draft EIR pages 5.18-27 and 5.18-28 the analysis of the Project's imported water supplies is based on the most current State Water Project Delivery Capability Report (DCR) prepared by the California Department of Water Resources (DWR), the state agency that owns operates the State Water Project (SWP). As stated in the DCR, since 2003 the DWR has been legally obligated to "prepare and deliver to all State Water Project (SWP) contractors, all city and county planning departments, and all regional and metropolitan

[2460] DRP 2017, Appendix 5.18-F, p. 6-1
[2461] DPW 2017, p. 5-1

planning departments within the project service area a report which accurately sets forth, under a range of hydrologic conditions, the then existing overall delivery capability of the project facilities and the allocation of that capacity to each contractor." As discussed in Draft EIR Section 5.18, the Project analysis uses the more conservative ELT delivery reliability scenario in the DCR rather than the DCR base scenario, because the ELT scenario incorporates much more significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. The analysis of Project imported water supplies is also consistent with and based on the analysis prepared by AVEK in the agency's current UWMP.[2462] The UWMP was approved by AVEK in 2016 and was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. AVEK is one of 29 SWP contractors with the DWR in California, and imports SWP water used in the Antelope Valley basin, including all of the SWP system supplies that the Project will use. The UWMP considered all of the scenarios presented by the DWR in the DCR and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2463] In addition, the UWMP used a single-dry year SWP allocation level of 5 percent, lower than used in the DCR ELT analysis, to reflect the historically low allocation in 2014. The Project water supply analysis incorporates the lower single-dry year delivery level and the 1990 to 1992 drought period delivery levels used in the AVEK UWMP and is more conservative than the DCR ELT scenario. In January 2017, at the request of the County, Kennedy-Jenks, a leading California water engineering company, provided a peer review report of the Project's water supply and demand analysis.[2464] The report concluded that the Draft EIR "correctly uses the ELT scenario to estimate future SWP supply availability from AVEK because it is based on existing facilities and regulatory constraints, with hydrology adjusted for the expected effects of climate change." The report also recommended that to be consistent with the AVEK UWMP, the Project analysis include a single-dry year SWP amount of 5 percent, which was implemented for the Project.[2465]

All Project use of groundwater, imported water return flow production, and water banking use will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution.[2466] The Adjudication Judgment and Physical Solution was approved by the California Superior Court in December 2015 to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution represents the best available information about and the legal framework governing the avoidance of potential long-term, cumulative impacts to the Antelope Valley Basin, including impacts that could occur from climate change. The fact that the Adjudication Judgment and Physical Solution takes account of and avoids potential long-term and cumulative impacts to the Antelope Valley Basin is recognized in the 2014 California Sustainable Groundwater Management Act, which

[2462] DRP 2017, Appendix 5.18-F
[2463] *Id.,* Appendix 5.18-F, p. 6-1
[2464] *Id.,* Appendix 5.18-G
[2465] *Id.,* Appendix 5.18-G, p. 18
[2466] *Id.,* Appendix 5.18-D

requires, for the first time in state history, that certain medium and high priority groundwater basins implement a plan to sustainably manage groundwater over time. Section 10720.8(b) of the Act specifically exempts the Antelope Valley from these requirements upon the approval of the Adjudication Judgment and Physical Solution. Section 10720.8 also exempts other adjudicated basins throughout the state. These exemptions demonstrate that an adjudication judgment, including the Antelope Valley Basin Adjudication Judgment and Physical Solution, accounts for and allocates water uses, avoids groundwater impacts, including long term, cumulative impacts that could be affected by climate chance, and ensures that groundwater use will be sustainable over time.

The fact that the ELT scenario includes a substantial analysis of climate change is specifically cited as the rationale for using the ELT scenario as stated on Draft EIR pages 5.18-27 and 5.18-28, on page 7-7 of Draft EIR Appendix 5.19-A, and in the AVEK UWMP.[2467] The following discussion summarizes the climate change factors included in the ELT scenario by the DWR in the current DCR.

The DCR states that the climate change methodologies used in the ELT scenario are described in Appendix 5.A.2 (Climate Change Approach and Implications for Aquatic Species) of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2468] As discussed on Draft EIR page 5.18-26, the BDCP is a comprehensive plan prepared by local water agencies, environmental and conservation organizations, State and federal agencies, and other stakeholders to implement a suite of habitat restoration measures, other Delta water quality and habitat stressor reduction activities, and water operations criteria that will facilitate the issuance of long-term permits to operate the SWP and other projects and water operations in the Delta. Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Service, the World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2469]

As stated on BDCP Appendix 5.A.2, page 5.A.2-8, natural hydrological variability is often greater than the magnitude of climate change expected over several decades. This requires the use of sophisticated computer models to combine the potential climate change "signal"—the effects on water resources caused by climate change—with the range of natural variability observed in the historical record. In addition, as stated on BDCP Appendix 5.A.2, page 5.A.2-2, global climate models continue to exhibit substantial uncertainty, especially a regional level of analysis. The coarse scale of global climate models requires that results must be "downscaled" and bias corrected for use in the analysis of hydrological impacts at a

[2467] *Id.,* Appendix 5.18-F, p. 6-1

[2468] BDCP 2014

[2469] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

regional or watershed level. BDCP Appendix 5.A.2 states that the dynamic or statistical methods used for downscaling add another source of uncertainty to the climate change projections.

To address these significant analytical concerns, the DWR, in consultation with multiple state and federal agencies, used a total of 112 IPCC future climate projections that were bias-corrected and statistically downscaled by the Lawrence Livermore National Laboratory under the World Climate Research Program's Coupled Model Intercomparison Project Phase 3 (CMIP3). In order to incorporate both the climate change signal and the natural variability in the longer-term observed record, an expanded time series was used that allows use of the long-term observed records consistent with hydrological and climate change analyses of the Pacific Northwest, the Lower Colorado River, in Texas and in recent Bureau of Reclamation analyses. This approach is called quantile mapping and maps the statistical properties of climate variables from one data subset with the time series of events from a different subset. As summarized on BDCP Appendix 5.A.2, page 5.A.2-8, the quantile mapping approach involves the following steps:

(1) Extract a 30-year slice of downscaled climate projections based on the climate model ensemble subset for the quadrant of interest and centered on the year of investigation (e.g., 2025 or 2060);

(2) For each calendar month (e.g., January) of the future period, determine the statistical properties of temperature and precipitation at each grid cell;

(3) For each calendar month of the historical period determine the statistical properties of temperature and precipitation at each grid cell;

(4) Develop quantile maps between the historical observed statistical properties and the future downscaled climate statistical properties such that the entire probability distribution (including means, variance, skew, etc.) at the monthly scale is transformed to reflect the climate scenario;

(5) Using the quantile maps, redevelop a monthly time series of temperature and precipitation over the observed period that incorporates the climate shift of the future period; and

(6) Convert monthly time series to a daily time series by scaling monthly values to daily sequence found in the observed record.

The quantile mapping approach generates a monthly or daily time series of temperature and precipitation that has the range of variability observed in the historical record, but also contains the shift in climate properties (both mean and expanded variability) found in the downscaled climate projections. These data were used as inputs to the Variable Infiltration Capacity (VIC) model, which is a hydrologic model that simulates streamflow from rainfall in each watershed, and the streamflow outputs from the VIC model were used as inputs to the SWP (and federal water system) operations models and water quality and water temperature models. CALSIM II, the most current available long-term model of California

hydrology, was used to simulate the response of California's river-reservoir conveyance system to climate change.

BDCP Appendix 5.4.A also provides a detailed discussion of the use of a 15-centimeter sea level rise in the ELT scenario. As discussed on BDCP Appendix 5.A.2, page 5.A.2-10, there remains considerable uncertainty in the projections and the state of sea level rise science. A 15-centimeter sea level rise in the ELT scenario was used in the analysis because it represents that mid-range of the available estimates for California water resources facilities during the applicable time period.

Consequently, the Draft EIR includes an extensive and thorough analysis of potential climate change impacts, including potential climate change impacts on water supplies. The analysis methodology has been subject to substantial public and state and federal agency review, and BDCP Appendix 5.4.A has been publicly available since at least 2013. The climate change analysis incorporated into the ELT accounts for the substantial and ongoing uncertainties in the analysis of climate change and water supply planning, including uncertainties about the magnitude and timing of potential sea level increases, the fact that natural climate variability is often much greater than the projected climate change "signals" or effects suggested by a model, and the uncertainties created by downscaling and bias adjusting global climate models for use on regional scales of analysis. The ELT scenario was developed in the DCR by the DWR, the owner and operator of the SWP, which has a legal obligation to analyze the reliability of SWP supplies on a biannual basis. AVEK, the largest SWP importer in the Antelope Valley, and one of only 29 statewide SWP system contractors, considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2470] The current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site is also based on the ELT projections in the AVEK UWMP.[2471]

Response to Comment F.8-226:

This comment does not address any specific element of the Project's water supply analysis, including climate change, and will be included in the record for consideration by the Regional Planning Commission and Board of Supervisors. The Draft EIR includes an extensive discussion of potential climate change impacts, including in Draft EIR Section 1.6.21, Section 5.21, and on pages 5.18-27 and 5.18-28 in Draft EIR Section 5.18. The Draft EIR states on page 5.18-27 that climate change may increase water supply uncertainties, including the reliability of SWP deliveries, by affecting the frequency, magnitude, and duration of extreme storm events and by reducing annual snowpack storage. Rising sea levels would also increase the risk of coastal flooding, Delta levee integrity, and water quality. Adverse changes

[2470] DRP 2017, Appendix 5.18-F, p. 6-1
[2471] DPW 2017, p. 5-1

in Delta water quality due to sea level rise, levee failures, more frequent and intense rainfall patterns and droughts could further constrain SWP exports.

As discussed on pages Draft EIR 5.18-27 and 5.18-28 the analysis of the Project's imported water supplies is based on the most current State Water Project Delivery Capability Report (DCR) prepared by the California Department of Water Resources (DWR), the state agency that owns operates the State Water Project (SWP). As stated in the DCR, since 2003 the DWR has been legally obligated to "prepare and deliver to all State Water Project (SWP) contractors, all city and county planning departments, and all regional and metropolitan planning departments within the project service area a report which accurately sets forth, under a range of hydrologic conditions, the then existing overall delivery capability of the project facilities and the allocation of that capacity to each contractor." As discussed in Draft EIR Section 5.18, the Project analysis uses the more conservative ELT delivery reliability scenario in the DCR rather than the DCR base scenario, because the ELT scenario incorporates much more significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. The analysis of Project imported water supplies is also consistent with and based on the analysis prepared by AVEK in the agency's current UWMP.[2472] The UWMP was approved by AVEK in 2016 and was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. AVEK is one of 29 SWP contractors with the DWR in California, and imports SWP water used in the Antelope Valley basin, including all of the SWP system supplies that the Project will use. The UWMP considered all of the scenarios presented by the DWR in the DCR and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2473] In addition, the UWMP used a single-dry year SWP allocation level of 5 percent, lower than used in the DCR ELT analysis, to reflect the historically low allocation in 2014. The Project water supply analysis incorporates the lower single-dry year delivery level and the 1990 to 1992 drought period delivery levels used in the AVEK UWMP and is more conservative than the DCR ELT scenario. In January 2017, at the request of the County, Kennedy-Jenks, a leading California water engineering company, provided a peer review report of the Project's water supply and demand analysis.[2474] The report concluded that the Draft EIR "correctly uses the ELT scenario to estimate future SWP supply availability from AVEK because it is based on existing facilities and regulatory constraints, with hydrology adjusted for the expected effects of climate change." The report also recommended that to be consistent with the AVEK UWMP, the Project analysis include a single-dry year SWP amount of 5 percent, which was implemented for the Project.[2475]

All Project use of groundwater, imported water return flow production, and water banking use will comply with the Antelope Valley Basin Adjudication Judgment and Physical

[2472] DRP 2017, Appendix 5.18-F
[2473] *Id.,* Appendix 5.18-F, p. 6-1
[2474] *Id.,* Appendix 5.18-G
[2475] *Id.,* Appendix 5.18-G, p. 18

Solution.[2476] The Adjudication Judgment and Physical Solution was approved by the California Superior Court in December 2015 to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution represents the best available information about and the legal framework governing the avoidance of potential long-term, cumulative impacts to the Antelope Valley Basin, including impacts that could occur from climate change. The fact that the Adjudication Judgment and Physical Solution takes account of and avoids potential long-term and cumulative impacts to the Antelope Valley Basin is recognized in the 2014 California Sustainable Groundwater Management Act, which requires, for the first time in state history, that certain medium and high priority groundwater basins implement a plan to sustainably manage groundwater over time. Section 10720.8(b) of the Act specifically exempts the Antelope Valley from these requirements upon the approval of the Adjudication Judgment and Physical Solution. Section 10720.8 also exempts other adjudicated basins throughout the state. These exemptions demonstrate that an adjudication judgment, including the Antelope Valley Basin Adjudication Judgment and Physical Solution, accounts for and allocates water uses, avoids groundwater impacts, including long term, cumulative impacts that could be affected by climate chance, and ensures that groundwater use will be sustainable over time.

The fact that the ELT scenario includes a substantial analysis of climate change is specifically cited as the rationale for using the ELT scenario as stated on Draft EIR pages 5.18-27 and 5.18-28, on page 7-7 of Draft EIR Appendix 5.19-A, and in the AVEK UWMP.[2477] The following discussion summarizes the climate change factors included in the ELT scenario by the DWR in the current DCR.

The DCR states that the climate change methodologies used in the ELT scenario are described in Appendix 5.A.2 (Climate Change Approach and Implications for Aquatic Species) of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2478] As discussed on Draft EIR page 5.18-26, the BDCP is a comprehensive plan prepared by local water agencies, environmental and conservation organizations, State and federal agencies, and other stakeholders to implement a suite of habitat restoration measures, other Delta water quality and habitat stressor reduction activities, and water operations criteria that will facilitate the issuance of long-term permits to operate the SWP and other projects and water operations in the Delta. Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District,

[2476] *Id.,* Appendix 5.18-D
[2477] *Id.,* Appendix 5.18-F, p. 6-1
[2478] BDCP 2014

the U.S. Fish and Wildlife Service, the World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2479]

As stated on BDCP Appendix 5.A.2, page 5.A.2-8, natural hydrological variability is often greater than the magnitude of climate change expected over several decades. This requires the use of sophisticated computer models to combine the potential climate change "signal"—the effects on water resources caused by climate change—with the range of natural variability observed in the historical record. In addition, as stated on BDCP Appendix 5.A.2, page 5.A.2-2, global climate models continue to exhibit substantial uncertainty, especially a regional level of analysis. The coarse scale of global climate models requires that results must be "downscaled" and bias corrected for use in the analysis of hydrological impacts at a regional or watershed level. BDCP Appendix 5.A.2 states that the dynamic or statistical methods used for downscaling add another source of uncertainty to the climate change projections.

To address these significant analytical concerns, the DWR, in consultation with multiple state and federal agencies, used a total of 112 IPCC future climate projections that were bias-corrected and statistically downscaled by the Lawrence Livermore National Laboratory under the World Climate Research Program's Coupled Model Intercomparison Project Phase 3 (CMIP3). In order to incorporate both the climate change signal and the natural variability in the longer-term observed record, an expanded time series was used that allows use of the long-term observed records consistent with hydrological and climate change analyses of the Pacific Northwest, the Lower Colorado River, in Texas and in recent Bureau of Reclamation analyses. This approach is called quantile mapping and maps the statistical properties of climate variables from one data subset with the time series of events from a different subset. As summarized on BDCP Appendix 5.A.2, page 5.A.2-8, the quantile mapping approach involves the following steps:

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[2479] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

(5) Using the quantile maps, redevelop a monthly time series of temperature and precipitation over the observed period that incorporates the climate shift of the future period; and

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The quantile mapping approach generates a monthly or daily time series of temperature and precipitation that has the range of variability observed in the historical record, but also contains the shift in climate properties (both mean and expanded variability) found in the downscaled climate projections. These data were used as inputs to the Variable Infiltration Capacity (VIC) model, which is a hydrologic model that simulates streamflow from rainfall in each watershed, and the streamflow outputs from the VIC model were used as inputs to the SWP (and federal water system) operations models and water quality and water temperature models. CALSIM II, the most current available long-term model of California hydrology, was used to simulate the response of California's river-reservoir conveyance system to climate change.

BDCP Appendix 5.4.A also provides a detailed discussion of the use of a 15-centimeter sea level rise in the ELT scenario. As discussed on BDCP Appendix 5.A.2, page 5.A.2-10, there remains considerable uncertainty in the projections and the state of sea level rise science. A 15-centimeter sea level rise in the ELT scenario was used in the analysis because it represents that mid-range of the available estimates for California water resources facilities during the applicable time period.

Consequently, the Draft EIR includes an extensive and thorough analysis of potential climate change impacts, including potential climate change impacts on water supplies. The analysis methodology has been subject to substantial public and state and federal agency review, and BDCP Appendix 5.4.A has been publicly available since at least 2013. The climate change analysis incorporated into the ELT accounts for the substantial and ongoing uncertainties in the analysis of climate change and water supply planning, including uncertainties about the magnitude and timing of potential sea level increases, the fact that natural climate variability is often much greater than the projected climate change "signals" or effects suggested by a model, and the uncertainties created by downscaling and bias adjusting global climate models for use on regional scales of analysis. The ELT scenario was developed in the DCR by the DWR, the owner and operator of the SWP, which has a legal obligation to analyze the reliability of SWP supplies on a biannual basis. AVEK, the largest SWP importer in the Antelope Valley, and one of only 29 statewide SWP system contractors, considered all of the scenarios presented by the DWR in the DCR, and determined that the ELT scenario is "the most conservative and appropriate study to use for long term planning estimates of future SWP supply availability. The ELT scenario is based on existing facilities, current operations, and regulatory constraints, with hydrology adjusted for the expected effects of climate change".[2480] The current UWMP adopted by Los Angeles County Waterworks District 40 for

[2480] DRP 2017, Appendix 5.18-F, p. 6-1

portions of the Antelope Valley to the east of the Project site is also based on the ELT projections in the AVEK UWMP.[2481]

Response to Comment F.8-227:

The Commenters' citation to *Pfeiffer v. City of Sunnyvale City Council* (2011) 200 Cal. App. 4th 1552, 1562-1563, is noted. As *Pfeiffer* notes, a lead agency's land use consistency determination is entitled to "great deference" and must be upheld unless "*no reasonable person* could have reached the same conclusion" (emphasis added) as the agency.[2482] "Because policies in a general plan reflect a range of competing interests, the governmental agency must be allowed to weigh and balance the plan's policies when applying them, and it has broad discretion to construe its policies in light of the plan's purposes."[2483] As long as "officials considered the applicable policies and the extent to which the proposed project conforms with those policies," the agency's determination must be affirmed.[2484] This highly deferential standard applies not just to a local government's determinations under the State's Planning & Zoning Law, but also to a lead agency's determination of plan consistency in a CEQA document, whether that determination is made in an Negative Declaration,[2485] or, as here, in an EIR.[2486]

The EIR thoroughly examines the Project's overall consistency with all applicable plans, including the County's General Plan and the Southern California Association of Governments' Regional Transportation Plan/Sustainable Communities Plan.[2487] The increase in housing and employment that would occur with Project implementation is consistent with the projections for the Project site included in the RTP/SCS, and the Project would also contribute to meeting the State-mandated Regional Housing Needs Assessment (RHNA) housing production goals for the unincorporated areas of the County. As the Draft EIR also shows, the Project would further the goals and policies of the General Plan, especially the goals and policies of the AVAP. Specifically, the EIR contains a detailed analysis of every goal and policy in the AVAP, showing that the Project complies with every applicable AVAP goal and policy.[2488] This detailed analysis fully complies with – and even exceeds – the County's obligations under CEQA. (See *N. Coast Rivers All*, 216 Cal.App.4th at 633 ["CEQA includes no . . . requirement" to "provide a detailed discussion of the Project's consistency with the plan"]; see also *Highway 68 Coal. v. Cty. of Monterey* (2017) 14 Cal. App. 5th 883, 896 ["CEQA does not require an analysis of general plan consistency"].)

The Lead Agency disagrees with the Commenters' assertions that the Project is inconsistent with applicable land use plans, for several reasons.

2481 DPW 2017, p. 5-1

2482 200 Cal.App.4th at 1563 [quoting *Save Our Peninsula Committee v. Monterey Cty. Bd. of Sup'rs* ("*Save Our Peninsula*") (2001) 87 Cal.App.4th 99, 142); *A Local & Regional Monitor v. City of Los Angeles* (1993) 16 Cal.App.4th 630, 648

2483 *Pfeiffer*, 200 Cal.App.4th at 1563 [citing *Save Our Peninsula*, 87 Cal.App.4th at 142]

2484 *Ibid.*

2485 *Joshua Tree Downtown Business All. v. Cty. of San Bernardino* (2016) 1 Cal.App.5th 677, 695-97

2486 *Pfeiffer*, 200 Cal.App.4th at 1561-63; *N. Coast Rivers All. v. Marin Mun. Water Dist. Bd. of Directors* (2013) 216 Cal.App.4th 614, 632-33

2487 DRP 2017, pp. 5.8-19 to -74; 5.9-23 to -33

2488 *Id.,* pp. 5.8-21 to -71

First, as set forth above, the Commenters' own cited authority affirms that an agency's consistency determination is valid unless a challenger can meet the "heavy burden" to show that "no reasonable person" could consider the project consistent with the plan, when that plan is viewed as a whole.[2489] "[G]eneral plan consistency may be found where a project is compatible with, and does not frustrate, the general plan's goals and policies."[2490] "[A]s long as the . . . [agency] reasonably could have made a determination of consistency, the . . . [agency's] decision must be upheld."[2491] The Commenters' opinions about the applicable plans are noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration, but none of these opinions establish that it would be entirely unreasonable for the Regional Planning Commission and Board of Supervisors to consider the Project compatible with the applicable plans.

Second, the Commenters do not argue that the Project is inconsistent with the General Plan, the AVAP, or any other applicable plan, as that plan is viewed in its entirety. Instead, the Commenters' claims are based on their argument that the Project conflicts with a handful of individual plan goals and policies, viewed in isolation. (See Comments F.8-228 through F.8-241.) As described in the Draft EIR and in responses to Comments F.8-228 through the F.8-241, the Project does not, in fact, conflict with any of the specific goals or policies cited by the Commenters. However, even if the Project *did* arguably create some tension with the handful of plan goals and policies cited by the Commenters, this fact would not establish that the Project is inconsistent with the plans when viewed as a whole.

"It is nearly, if not absolutely, impossible for a project to be in perfect conformity with each and every policy set forth in the applicable plan."[2492] No project "could completely satisfy every policy" in a general plan, and the law "does not impose such a requirement." (*Sequoyah Hills Homeowners Assn v. City of Oakland* (1993) 23 Cal.App.4th 704, 719; see also *Pfeiffer*, 200 Cal.App.4th at 1563 (quoting *Friends of Lagoon Valley*, 154 Cal.App.4th at 817) ("State law does not require perfect conformity between a proposed project and the applicable general plan.") "General plans ordinarily do not state specific mandates or prohibitions. Rather, they state 'policies,' and set forth 'goals.'"[2493] "An action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment."[2494] It is only required "that a project be 'in agreement or harmony with the terms of the applicable plan, not in rigid conformity with every detail thereof.'" (*Naraghi Lakes*, 1 Cal.App.5th at 18 [quoting *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656, 678].)

Moreover, "[a]n agency . . . has the discretion to approve a plan even though the plan is not consistent with all of a specific plan's policies. It is enough that the proposed project will be compatible with the objectives, policies, general land uses and programs specified in the

2489 *Pfeiffer*, 200 Cal.App.4th at 1563
2490 *Naraghi Lakes Neighborhood Pres. Ass'n v. City of Modesto* (2016) 1 Cal. App. 5th 9, 23 [quotation omitted].
2491 *Id.* [quoting *California Native Plant Society v. City of Rancho Cordova* ("*CNPS*") (2009) 172 Cal.App.4th 603, 637]
2492 *Pfeiffer*, 200 Cal.App.4th at 1563 [quoting *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1511]
2493 *Naraghi Lakes*, 1 Cal.App.5th at 17
2494 *Pfeiffer*, 200 Cal.App.4th at 1563 [quoting *Friends of Lagoon Valley*, 154 Cal.App.4th at 817]

applicable plan."[2495] Accordingly, agencies have a well-established authority to "'weigh and balance the various policies when considering project compliance."[2496] Even a project that conflicts with one or several specific policies can validly be considered consistent with the plan as whole, as long the agency reasonably concludes that the project is "generally compatible with the . . . policies" in the plan, or concludes that "'on balance,' the project would further the . . . policies and not obstruct their attainment."[2497] (See also *Friends of Lagoon Valley*, 154 Cal.App.4th at 822 [although city acknowledged that "some aspects of ... [the project] ... deviated from particular planning provisions" in the city's General Plan, the city's overall consistency determination was affirmed; the court rejected claims of General Plan inconsistency, noting that the challenger "construes the policies expressed in the plans too rigidly and ignores the flexibility City officials have in implementing them"].) And, as stated above, to demonstrate inconsistency, it must be the case that no reasonable person could consider the project to be consistent with the plan as whole, even after considering all of the evidence supporting the agency's consistency determination.[2498]

Here, the Project furthers numerous General Plan goals and policies, including but not limited to the following:

- The Project furthers the five "**Guiding Principles**" of the General Plan: to employ smart growth; ensure community services and infrastructure are sufficient to accommodate growth; provide the foundation for a strong and diverse economy; promote excellence in environmental resource management; and provide healthy, livable and equitable communities. The Project will provide housing opportunities at a variety of income levels pursuant to the Centennial Affordable Housing Implementation Plan (PDF 9-1), will create an estimated 23,675 permanent jobs, will protect large expanses of open space, along with scattered parks and recreational facilities, will locate commercial areas, schools, and parks at the village cores in order to promote a balanced distribution of land uses, will feature a network of bikeways, trails and sidewalks to promote healthy living, and will accommodate health clubs, health food stores, health service clinics, health retreats, community gardens, as well as 50 acres of small-scale agriculture and agriculture-related uses such as community gardens, farmers markets/fresh fruit and vegetable stands, growing and sales of nursery stock, and commercial greenhouses.[2499] (See response to Comment F.8-20.)
- The Project meets the goals and policies of the General Plan **Land Use Element,** including but not limited to the following:
    - **Goal LU 5** ("Vibrant, livable and healthy communities with a mix of land uses, services and amenities") and related **Policies LU 5.1, 5.2, 5.3, 5., 5.5, 5.6, 5.7 and 5.8**. As described above and in the Draft EIR, Section 5.8, L*and Use, Entitlements & Planning*, pages 5.8-7 through 5.8-9 and pages 5.8-20 through

[2495] *Sierra Club*, 121 Cal. App. 4th at 1511
[2496] *San Francisco Tomorrow v. City & Cnty. of San Francisco* (2014) 228 Cal. App. 4th 1239, 1252
[2497] *Ibid.*
[2498] *Pfeiffer*, 200 Call.App.4th at 1566; *CNPS*, 172 Cal.App.4th at 637-39
[2499] DRP 2017, pp. 5.8-7 to -9, -20, -21; pp. 5.9-1, -28; LACDRP 2015, pp. 18-19

5.8-21, the Project will provide a broad mix of land uses, with a well-distributed mix of commercial, recreational and educational uses.

- **Goal LU 9** ("Land use patterns and community infrastructure that promote health and wellness"), and related **Policies 9.1, 9.2 & 9.3**, and **Goal LU 10** ("Well-designed and healthy places that support a diversity of built environments"). The Project will provide a network of bikeways, trails and sidewalks throughout the Project site, along with scattered parks and recreational facilities, and will provide opportunities for such uses as health clubs, health food stores, health service clinics, health retreats, community gardens, community gardens, and farmers markets.
- **Goal LU 11** ("Development that utilize sustainable design techniques") and related **Policies 11.4, 11.7 and 11.8**. The Project includes numerous sustainable design performance metrics, described in the Mission and Vision, and in Appendix 2-A, *Green Development Program,* of the Specific Plan.

- The Project furthers the goals and priorities of the County's **Housing Element**,[2500] thereby assisting the County in meeting its legal obligations under the State Housing Element Law, Gov. Code § 65580 *et seq*, and in addressing the Statewide affordable housing crisis. Specifically, the Project would further the following Housing Element goals and policies:
  - **Goal 1** (**"**A wide range of housing types in sufficient supply to meet the needs of current and future residents, particularly for persons with special needs, including but not limited to low income households, seniors, persons with disabilities, large households, single-parent households, the homeless and at risk of homelessness, and farmworkers") and **Policy 1.1** ("Make available through land use planning and zoning an adequate inventory of vacant and underutilized sites to accommodate the County's Regional Housing Needs Assessment (RHNA) allocation"). The Project would contribute to meeting the State-mandated Regional Housing Needs Assessment (RHNA) housing production goals for the unincorporated areas of the County and would be consistent with the regional effort to boost housing production in unincorporated areas of Los Angeles County to meet regional housing needs.[2501]
  - **Goal 2** ("Sustainable communities with access to employment opportunities, community facilities and services, and amenities"), and **Policy 2.1** ("Support the development of housing for low and moderate-income households and those with special needs near employment and transit"). The Project includes a Mobility Plan that requires formation and ongoing operation of a Transportation Management Association, includes facilities for alternatives to automobile (e.g., public transit, bicycle and pedestrian systems), and locates

[2500] LACDRP 2014
[2501] DRP 2017, pp. 5.9-2, -3, -28, -29

the town center in a manner to accommodate mixed-use developments and high density residential uses nearby to commercial uses.[2502]

- **Goal 3** ("A housing supply that ranges broadly in housing costs to enable all households, regardless of income, to secure adequate housing"), **Policy 1.3** ("Coordinate with the private sector in the development of housing for low and moderate-income households and those with special needs. Where appropriate, promote such development through incentives"), **Policy 1.4** ("Assist housing developers to identify and consolidate suitable sites for developing housing for low and moderate-income households and those with special needs") and **Policy 3.1** ("Promote mixed income neighborhoods and a diversity of housing types throughout the unincorporated areas to increase housing choices for all economic segments of the population"). In accordance with the Centennial Affordable Housing Implementation Plan (PDF 9-1), the Project would also include a minimum of 10 percent or 1,933 units that would be affordable to either very low, low, or moderate-income households, and a mix of single family attached, multi-family attached, and mixed-use units would be provided throughout the Project site.[2503]

- The Project furthers the goals and policies in the General Plan's **Economic Development Element**, including but not limited to the following goals and policies:
  - **Goal ED 1** ("An economic base and fiscal structures that attract and retain valuable industries and businesses") and related **Policies ED 1.1, 1.2, 1.4, 1.5, 1.6, and 1.8.** The Project will create an estimated 23,675 permanent jobs, and a full range of light industrial, business, and other commercial uses are planned that are intended to yield a broad range of employment opportunities, from retail services to large corporate employers.[2504]
  - **Goal ED 2** ("Land use practices and regulations that foster economic development and growth") and related policies **ED 2.4, 2.5, 2.6, and 2.7**. As described immediately above and in the Draft EIR, the Project will create jobs and employment opportunities that will foster economic growth in the Economic Opportunity Areas that are identified in the AVAP as the appropriate locations for growth.

Focusing specifically on the AVAP, the component of the General Plan most directly relevant to the Project site, the Commenters do not dispute that, as shown in the Draft EIR, Section 5.8, *Land Use, Entitlements and Planning*, pages 5.8-20 through 5.8-71, the Project would further all of the following AVAP goals and policies, among many others:

- **Goal LU 1** ("A land use pattern that maintains and enhances the rural character of the unincorporated Antelope Valley"), and related **Policies LU 1.1, 1.2 and 1.3.** The Project conforms to the Land Use Policy Map of the AVAP, focuses development and

[2502] *Id.,* pp. 5.7-20, 5.8-30 to -41
[2503] *Id.,* p. 5.9-28
[2504] *Id.,* pp. 5.8-74, 5.9-29

associated growth within areas identified for growth, and preserves rural preserve areas.

- **Policy LU 1.4** ("Ensure that there are appropriate lands for commercial and industrial services throughout the unincorporated Antelope Valley sufficient to serve the daily needs of rural residents and to provide local employment opportunities"). The Project's commercial, business park and institutional/civic uses will serve rural residents and are anticipated to create 23,675 permanent jobs.
- **Policy LU 1.5** ("Provide varied lands for residential uses sufficient to meet the needs of all segments of the population, and allow for agriculture, equestrian uses and animal-keeping uses in these areas where appropriate"). The Project will create significant housing opportunities for different segments of the population, and will set aside 50 acres for small-scale agriculture.
- **Goal LU 4** ("A land use pattern that promotes the efficient use of existing and/or planned infrastructure and public facilities"). The Project will promote efficient use of infrastructure and public facilities, by implementing specific planning and design metrics in the Specific Plan.[2505]
- **Goal LU 6** ("A land use pattern that makes the Antelope Valley a sustainable and resilient place to live"). One of the Project's key objectives is to implement the AVAP land use designation for the site, and ensure consistency with the SCAG Sustainable Community Strategy.[2506]
- **Goal M 3** ("An efficient network of major, secondary, and limited secondary highways to serve the Antelope Valley") and related **Policies M 3.1, M 3.2, M 3.3, M 3.4, and M 3.5.** The Project's internal roadways will establish the highway system that will serve the Project and surrounding areas, and the Project will also create a network of "right-sized" secondary roadways, contribute to the Project's fair share for improvements, and comply with the Traffic Mitigation Agreement with the County and Caltrans.[2507]
- **Goal COS 10** ("Diverse energy systems that utilize existing renewable or waste resources to meet future energy demands"), **Goal COS 11** ("Energy systems for use in public facilities that reduce consumption of nonrenewable resources while maintaining public safety"), **Goal COS 12** ("Individual energy systems for onsite use that reduce consumption of non-renewable resources and dependence on utility-scale energy production facilities") and related **Policies COS 10.1, 10.2, 10.6**, **11.2, 11.3, and 12.1**, and **Policy ED 1.10.** A minimum of 50 percent of the Project's anticipated electrical energy demand at buildout shall be met by onsite renewable energy, the Project will equip 100 percent of all single-family detached homes to be "solar-ready" or equivalent, based on the latest technology, the Project's wastewater reclamation facilities will capture and reuse biogas for energy, and the Specific Plan's Utility land use designation allows for a Materials Recovery Facility/Solid Waste Transfer Facility and green waste mulching.

[2505] *Id.,* Appendix 4.0-A, Table MV-1, pp. M-8 to M-10
[2506] *Id.,* p. 5.21-85
[2507] *Id.,* pp. 5.10-1 to -2

- **Goal COS 17** ("Buildings are sustainable, conserving energy, water, and other resources, and limiting greenhouse gas emissions") and related **Policies COS 17.1, 17.2, 17.4, 17.5, 17.6, 17.7, 17.8, and 17.9.** The Project includes a Green Development Program that requires all development to incorporate environmentally sustainable development practices in the design and construction of the Project.
- **Policy ED 1.20** ("Support the development of a range of travel options that better connect the Antelope Valley to existing regional trade and employment centers in other regions, including the High Desert Corridor and the Northwest 138 Corridor Improvement Project, as directed in the policies of the Mobility Element"). + other mobility
- **Goal ED 1** ("A healthy and balanced economic base in the Antelope Valley that attracts a wide range of industries and businesses and provides high-paying jobs for local residents"), **Policy ED 1.1** ("Promote the continued development of regional commercial and industrial employment centers in economic opportunity areas in the Antelope Valley.") and **Policy ED 1.3** ("Support the growth of "high-tech" industries to employ the Antelope Valley population's highly educated workforce.") The Project would provide areas for nonresidential development that would accommodate commercial and business park uses that would accommodate employment centers and improve the economic base of the Antelope Valley.
- **Policy ED 1.15** ("Where appropriate, promote residential development as part of a wider mixed-use strategy in communities that desire such uses in their areas and where plans for major infrastructure and facilities are currently underway. These areas have been identified as economic opportunity areas as shown in the Land Use Policy Map (Map 2.1) of this Area Plan"). The Project is consistent with the Land Use Policy Map of the AVAP, would include mixed use neighborhoods to promote walkability as described in the Specific Plan, and would focus land use development and associated growth within the West EOA and Future Rural Town Area where future development is planned and anticipated.
- **Policy ED 1.19** ("Promote the creation of a four-year public university in the Antelope Valley to provide opportunities for continuing education and workforce development"). The Project would accommodate a college campus as a permitted use in areas designated as Business Park, School, and Institutional/Civic and allowed subject to a CUP in areas designated as Mixed Use, Commercial, and Recreation/Entertainment. Also, the increase in population brought by the Project would make a university in the Antelope Valley more viable.

This is only a small subset of the numerous General Plan and AVAP goals and policies that the Project would further.[2508]

To the extent that the Project creates any arguable inconsistency with any of the specific AVAP or General Plan goals and policies cited by the Commenters in their comment letter, those goals and policies must be weighed and balanced against the numerous goals and

[2508] *Id.,* pp. 5.8-20 to -71

policies that the Project would further. On balance, the Project is in harmony with the General Plan, the AVAP, and all applicable plans, when those plans are viewed as a whole. The Project is generally compatible with the plans' goals and policies and will not obstruct their attainment.

"Because EIRs are required only to evaluate 'any inconsistencies' with plans, no analysis should be required if the project is consistent with the relevant plans."[2509] Here, the EIR's analysis demonstrates that the Project is not inconsistent with the General Plan, the AVAP, or any other applicable plan, especially when those plans are viewed as a whole. Therefore, the EIR's Land Use, Entitlements and Planning section properly concludes that the Project does not have the potential to cause a significant impact on the environment.

Third, it is also important to note that land use inconsistency is not, standing alone, a significant CEQA impact. CEQA's scope is limited to "physical impacts on the environment," and does not include "social or economic impacts."[2510] "[A]n inconsistency between a project and other land use controls does not in itself mandate a finding of significance… [i]t is merely a factor to be considered in determining whether a particular project may cause a significant environmental effect."[2511] Therefore, it is "incorrect" to assert that "[land use] inconsistency itself is an environmental impact"; rather, "inconsistency between a proposed project and an applicable plan is a legal determination, not a physical impact on the environment." (Kostka & Zischke, Practice Under the California Environmental Quality Act (2d ed. Cal CEB) § 12.34; see also *Highway 68 Coal.*, 14 Cal. App. 5th at 893 ("the issue of whether a proposed project is consistent with a county's general plan is not a CEQA issue").)

Even if the Project were inconsistent with an applicable plan (which it is not), this would only present a CEQA issue to the extent the inconsistency would cause "physical impacts on the environment."[2512] The Commenters provide their opinions disputing the County's legal determination of plan consistency, but the Commenters do not identify how the alleged inconsistencies would cause any significant physical impacts on the environment that are distinct from the impacts analyzed in the other sections of the EIR. The EIR fully discloses, analyzes and mitigates the Project's potentially significant physical impacts on the environment in compliance with CEQA.

Response to Comment F.8-228:

Page 5.9-24 of the Draft EIR acknowledges that the projected population of the Project is more than the projected 2040 population for the two TAZs covering the Project site. SCAG projects a 2040 resident population of 51,872 residents, while it is estimated that 57,150 persons would be residents of the Project. However, Table 5.9-14 on page 5.9-17 shows that SCAG's 2040 household projections for the two TAZs is 22,496 households, which is more than the 19,333 dwelling units proposed by the Project. Thus, although the Project may exceed SCAG's population projections, it would not exceed – and in fact, would be

[2509] *Id., N. Coast Rivers Alliance*, 216 Cal.App.4th at 632 [quoting C*ity of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 918-919]
[2510] CEQA Guidelines §§ 21080(e)(2), 21082.2(c)
[2511] *Lighthouse Field Beach Rescue v. City of Santa Cruz* (2005) 131 Cal.App.4th 1170, 1207
[2512] CEQA Guidelines § 21080(e)(2)

considerably less than – SCAG's household projections. The potential exceedance in SCAG's population projection can be attributed to the difference in assumed household sizes, with SCAG assuming a smaller household size than the Draft EIR.[2513] The growth forecasts in the 2016-2040 RTP/SCS assume an average household size in the region of 3.0 persons per household by 2040, which is more in line with the Project's 57,120 residents in 19,333 units/households (2.95 persons per household).

Also, the 2016 RTP/SCS states that TAZ level data or any data at a geography smaller than the jurisdictional level is included in the draft growth forecasts for regional modeling purpose only, and is advisory and non-binding, since these sub-jurisdictional forecasts are not adopted as part of the 2016-2040 RTP/SCS. Thus, the difference in the Draft EIR's and SCAG's assumptions of the average household size in the Project area is not an inconsistency with SCAG projections or an inconsistency with the 2016-2040 RTP/SCS.

Since there is currently very limited existing development on the site and in the surrounding area that are within the two TAZs, SCAG's estimates of over 50,000 residents and over 22,000 households by 2040 clearly indicate that future growth is expected in the area and anticipated in the SCAG (see Exhibits 3, 6, and 9 in the Demographics and Growth Forecast for the 2016-2040 RTP/SCS). In addition, the higher estimate of the resident population of the Project provides a more conservative estimate for impact analysis in the Draft EIR.

With regards to Project consistency with the SCS component of the 2016-2040 RTP/SCS, Government Code Section 65080(b)(2)(B) states that SCAG must prepare an SCS using the more recent planning assumptions, considering local general plans and other factors. The Project is consistent with the AVAP that was adopted by the County in 2015. The SCS must identify the general location of land uses, residential densities, and building intensities within the region; areas to house all the population of the region; areas to house projected regional housing needs; and a transportation network to service transportation needs of the region. The SCS must also consider information on resource areas and farmlands and state housing goals; and forecast development pattern for the region. The Project is consistent with the planned development pattern for the Antelope Valley area and would provide housing for future residents of the region, which would be within the 2040 projections of SCAG. The Project would also help meet regional housing needs. SCAG also states that the sub-jurisdictional data and/or maps used to determine consistency with the SCS shall only be used at the discretion and with the approval of the local jurisdiction. While the County has presented sub-jurisdictional data at the TAZ level in the Draft EIR for informational purposes, the County in its discretion does not consider the difference in population projections to be a significant impact in light of the Project's consistency with the SCAG's household projections.

The development of the Project site is anticipated by, and consistent with, SCAG's 2012-2035 RTP/SCS, as well as SCAG's 2016-2040 RTP/SCS.[2514] (See responses to Comments F.8-229 and F.8-233.) When developing the 2012 RTP/SCS, some commenters raised questions about whether the development of the Project site should be incorporated as part of the

[2513] DRP 2017, p. 5.9-11

[2514] *Id.,* pp. 5.8-2, -5 to -7, -73, -74; pp. 5.9-1 to -3, -7, -8, -23 to -28

RTP/SCS. SCAG explicitly determined that development of the Project site should, and would, remain part of the plan, and clarified the EIR's methodology to better describe the fact that the plan incorporated development of the Project site into the RTP/SCS's regional growth forecasts.[2515]

Finally, as described in response to Comment F.8-227, CEQA's scope is limited to "physical impacts on the environment," and does not include "social or economic impacts."[2516] "[A]n inconsistency between a project and other land use controls does not in itself mandate a finding of significance… [i]t is merely a factor to be considered in determining whether a particular project may cause a significant environmental effect."[2517] Therefore, it is "incorrect" to assert that "[plan] inconsistency itself is an environmental impact"; rather, "inconsistency between a proposed project and an applicable plan is a legal determination, not a physical impact on the environment."[2518] Even to the extent there is any inconsistency between the Project and the RTP-SCS, this would only create a CEQA impact to the extent it would cause a physical impact on the environment. The Commenters do not describe any way in which the alleged inconsistency they identify would lead to impacts on the physical environment that are distinct from the physical impacts analyzed in the other chapters of the EIR. The EIR fully analyzes and mitigates all of the Project's reasonably foreseeable physical impacts on the environment in compliance with CEQA.

Response to Comment F.8-229:

As the Draft EIR states, the EIR "does not tier from, nor is it legally reliant upon" the AVAP EIR.[2519] The fact that the EIR cites to the AVAP and the AVAP EIR in various places does not change this fact. The Commenters cite no authority for the proposition that any time an EIR cites to a previous EIR, the later EIR is automatically "tiered" from, or legally reliant upon, the cited EIR. CEQA imposes no such requirement. To the contrary, CEQA and the State CEQA Guidelines explicitly authorize, and encourage, the practice of citing to, and incorporating by reference, relevant information from other EIRs and from other relevant documents.[2520] The AVAP and the AVAP EIR are part of the planning context for the Project, and therefore it is entirely appropriate that the Project EIR cite to the AVAP and to the AVAP EIR.[2521]

Under CEQA, "tiering" is governed by sections 21093 and 21094 of the State Public Resources Code, and two specific State CEQA Guidelines, 15152 and 15385, both entitled "Tiering." "Tiering is 'the coverage of general matters in broader EIRs (such as on general plans or policy statements) with subsequent narrower EIRs.'" (*In re Bay-Delta Programmatic Envtl. Impact Report Coordinated Proceedings* (2008) 43 Cal. 4th 1143, 1170 [quoting State CEQA Guidelines, § 15385.]) "Tiering is properly used to defer analysis of environmental impacts and mitigation measures to later phases when the impacts or mitigation measures

2515 SCAG. 2012 (April). 2012-2035 Regional Transportation Plan, Comments and Responses, at pp. 72-73 and 246-47; SCAG (March). Final Programmatic Environmental Impact Report for the 2012-2035 RTS/SCS, at pp. 2-5 and 4-5.
2516 CEQA Guidelines §§ 21080(e)(2), 21082.2(c)
2517 *Lighthouse Field Beach Rescue v. City of Santa Cruz* (2005) 131 Cal.App.4th 1170, 1207
2518 Kostka & Zischke, Practice Under the California Environmental Quality Act (2d ed. Cal CEB) § 12.34
2519 DRP 2017, p. 5.8-3
2520 CEQA Guidelines § 21061; CEQA Guidelines §§ 15148 & 15150
2521 DRP 2017, p. 2-3; 3-11 to -22; 4-8 to -10

are not determined by the first-tier approval decision but are specific to the later phases."[2522] CEQA entrusts to the lead agency the responsibility to determine whether it is feasible and appropriate in a given circumstance for an EIR to "tier" from a previous EIR.[2523] The EIR for this Project does not "tier" from any previous EIR.

The relationship between the Project EIR and the previously certified General Plan and AVAP EIRs is governed by a different section of the Public Resources Code, section 21083.3, and a different State CEQA Guideline, § 15183, entitled "Projects Consistent with a Community Plan, General Plan, or Zoning." CEQA section 21083.3 and State CEQA Guideline section 15183 apply when, as here, a project is consistent with a General Plan for which an EIR was certified. As the Supreme Court has explained, "[w]hen approving a project that is consistent with a community plan, general plan, or zoning ordinance for which an environmental impact report already has been certified, a public agency need examine only those environmental effects that are peculiar to the project and were not analyzed or were insufficiently analyzed in the prior environmental impact report."[2524]

Here, the Project EIR falls within the parameters of CEQA § 21083.3 and State CEQA Guideline § 151583 because the Project is consistent with several different adopted plans, and an EIR was certified for each of those plans. First, although the EIR does not tier from the EIRs for the Southern California Association of Governments' 2012-2035 and 2016-2040 Regional Transportation Plans/Sustainable Community Strategies, the increase in housing and employment that would occur with Project implementation is consistent with both RTP/SCS's projections for the Project site.[2525] Second, the Project is also consistent with the AVAP as adopted by the Board in June 2015. Third, when the Board of Supervisors adopted its comprehensive 2035 General Plan Update in October 2015, it incorporated all adopted area plans – including the June 2015 AVAP, which identified the Project site for development as an Economic Opportunity Area – into the County's General Plan. EIRs were certified for all of these plans. Accordingly, CEQA only legally requires the Project EIR to analyze those "environmental effects that are peculiar to the project and were not analyzed or were insufficiently analyzed" in the previously certified EIRs.[2526] The Project EIR more than fulfills this legal requirement. The Project more than sufficiently analyzes all impacts peculiar to the Project which were not analyzed in the prior EIRs – and even goes well beyond this minimum legal requirement to ensure that all reasonably foreseeable environmental impacts of the Project are fully addressed.

As the Draft EIR explicitly discloses and acknowledges, Commenter CBD filed a lawsuit challenging the County's EIR for the AVAP, and it is theoretically possible that one outcome of that suit could be that the County's June 2015 adoption of the AVAP could be set aside.[2527]

2522 *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 431

2523 CEQA Guidelines § 21093(b)

2524 *Muzzy Ranch Co. v. Solano Cty. Airport Land Use Comm'n* (2007) 41 Cal. 4th 372, 388–89; *Gilroy Citizens for Responsible Planning v. City of Gilroy* (2006) 140 Cal. App. 4th 911, 935; *Gentry v. City of Murrieta* (1995) 36 Cal. App. 4th 1359, 1374

2525 DRP 2017, pp. 5.8-73 and -74, 5.9-27 to -32

2526 *Muzzy Ranch Co.*, 41 Cal.4th at 389

2527 DRP 2017, pp. 5.8-71 to 5.8-73

However, it is very unlikely that this suit will result in any outcome that would affect the analysis in this Project's EIR, for several reasons.

First, in May 2017, the Los Angeles Superior Court rejected CBD's challenge in its entirety, affirming the validity of the AVAP EIR.[2528] CBD's challenge to the AVAP EIR was very narrow – CBD did not dispute that the AVAP EIR complied with CEQA in all respects when analyzing and mitigating the impacts of the version of the AVAP that was presented to the Board of Supervisors in November 2014. Instead, CBD's challenge rested entirely on its contention that the AVAP EIR and the Board of Supervisors' findings insufficiently analyzed certain relatively minor *modifications* to the AVAP that the Board of Supervisors made between November 2014 and June 2015.[2529] As the Superior Court noted, CBD's "arguments implicitly concede the adequacy of the FEIR without the subsequent amendments."[2530]

As the County noted in briefing:

> As is typical of a massive planning process, the draft AVAP underwent a number of modifications prior to final adoption in response to numerous, diverse stakeholders. Ultimately, the adopted AVAP reconciled inconsistencies between land in the draft AVAP both located within an EOA, i.e., targeted for growth, and subject to new, more-restrictive growth policies. Petitioner Center for Biological Diversity ("CBD") recognized these inconsistencies during the administrative process and asked the County to resolve them by further restricting growth in the proposed EOAs. (AR 2774-75.) Instead, the County weighed the multiple policy priorities before it and determined it best to promote and direct future growth into the EOAs. (See *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199 ("*County of Inyo*") ["CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal."])
>
> CBD is disappointed that the ultimately-adopted AVAP includes a slightly smaller increase of SEA acreage than originally identified, and that the EOAs will not be subject to some of the AVAP's more restrictive growth policies. CBD's disappointment, however, does not translate into a violation of the California Environmental Quality Act ("CEQA").[2531]

2528 See generally AVAP Ruling.

2529 See CBD AVAP Open. Br.; CBD AVAP Reply Br.

2530 AVAP Ruling, at p. 13. See also Reporter's Transcript of Proceedings, *Ctr. for Biologicial Diversity v. Cty. of Los Angeles*, No. BS 156932 (L.A. Cty. Sup. Ct. May 16, 2017) ("AVAP Transcript"), at pp. 4 -5 (Court: "To me it seems, and you can correct me if you disagree, it seems to me the petitioner is conceding the validity of the FEIR for the project"; CBD's counsel: "I think that's correct, your Honor. The focus here is on the change of project"); see also *id.* at p. 58 (CBD's counsel: "We haven't attacked the adequacy of the EIR, per se . . .."). To the extent CBD's petition alleged any other inadequacies in the AVAP EIR, CBD has now waived those arguments by declining to present them to the trial court in merits briefing. (See *City of Arcadia v. State Water Res. Control Bd.* (2006) 135 Cal. App. 4th 1392, 1424.)

2531 County AVAP Br., at p. 1 (citing Joint Appendix, *Ctr. For Biological Diversity v. Cnty. of Los Angeles*, No. BS156932 (L.A. Cnty. Sup. Ct. Feb. 15, 2017) ("AVAP Joint Appendix"), at pp. AR 2774-75).

As the County further explained, the changes made to the project between November 2014 and June 2015 did not rise to the level requiring recirculation or supplemental CEQA review, and the changes also did not render either the EIR's Project Description or the Board of Supervisors' findings inadequate.[2532] As the County noted, although "CBD laments that the Board did not apply the SEA designation to an unspecified 14,000 acres of the originally-proposed 356,773 acres . . . [t]o put this in context, a reduction of 14,000 acres by the Board still results in 342,773 acres of SEA, an approximately 208.000-acre (or 154%) expansion over existing SEA acres in the Project Area."[2533] The Los Angeles Superior Court agreed with the County in all respects, rejecting all of CBD's challenges and upholding the validity of the AVAP EIR, noting as follows, *inter alia*:

> At the hearing, the County's counsel argued that the eliminated policies are implemented for the EOAs through the land use designation. The court reviewed the Land Use Policy maps showing the SEAs and EOA land use designations. AR 30358-59. These maps show that the land use designation for the East EOA is mostly RL 10 (one residence every 10 acres) and RL20 (one residence every 20 acres) in the area covered by the former SEA within the East EOA. AR 459, 30359. Thus, the SEA may have been removed from the East EOA, but the rural density requirement of one home every 20 acres otherwise protects the scenic views. The same is true of the other two EOAs, and the West EOA also has a designation for a considerable amount of open space. AR 30358-59. Hence, the land use designations for the EOAs provide considerable protection for scenic views in the EOAs despite the loss of SEA.
>
> The 14,000 acre decrease from the Project's 208,000 acre increase is a number that by itself means little. The FEIR does not rely on the designation of any particular acreage as SEA in its environmental analysis, or otherwise state or imply that the proposed 365,773 acres of SEA is necessary to achieve the analyzed minimization of impacts. Indeed, as the County notes, the FEIR is a programmatic document which may be based more on conceptual analysis than hard numbers. Opp. at 9, n. 5. The FEIR and AVAP both state that the SEAs are intended to change gradually over time, and to continually evolve as part of the balance between environmental protection and property rights. AR 474, 30305. This is additional support for a conclusion that the somewhat smaller amount of SEA acreage in the approved Project is not a significant change from the Project studied in the FEIR.
>
> CBD has not shown that the amendments to the Project were significant new information that changed the Project in a way that deprived the public of a meaningful opportunity to comment on a substantial new or increased environmental effect. Guidelines § 15088.5(a). As a result, substantial evidence supports the County's decision that the amendments did not change

[2532] County AVAP Br., at pp. 8-14.
[2533] *Id.* at p. 9 (citing AVAP Joint Appendix, at p. AR 651).

the FEIR's conclusions and the County is not required to revise and recirculate the FEIR.

[. . .]

More importantly, the amendments did not change the Project analyzed by the FEIR. As discussed *ante*, the amendments were not intended to create a different Project, but rather to make the existing Project internally consistent. The overarching purpose of the AVAP is to preserve the natural environment and rural character of the Antelope Valley while responding to the need for additional housing and employment. The AVAP seeks to focus new development into three EOAs while preserving areas outside the EOAs and existing town areas with new Open Space and Land Use policies, new low-density land use designations, and a significant expansion of SEAs. The draft AVAP inconsistently required land within an EOA and necessarily targeted for growth to be subject to the new, more-restrictive growth policies for SEA, Rural Preserve Areas, and other policies. The amendments implemented the Project's purpose of causing development to occur within the EOAs by removing those restrictions within EOAs. The amendments were consistent with the AVAP's purpose and did not change the Project.

The FEIR adequately describes the Project as approved, permitted informed decision-making about the Project's benefits and environmental impacts.

[. . .]

The Board of Supervisor's decision in the Statement of Overriding Considerations – that the amended AVAP's benefits outweigh its environmental impacts that cannot feasibly be mitigated -- may not be lightly overturned. *See* City of Marina v. Board of Trustees of Cal. State University, (2006) 39 Cal.4th 341, 368. The Board of Supervisors' decision is supported by substantial evidence.

[. . .]

The County's decision to approve the Project as amended did not violate CEQA. "The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal." County of Inyo v. City of Los Angeles, *supra,* 71 Cal.App.3d at 199. The amendments are the type of change to be expected in the CEQA process. *Cf* County of Inyo, *supra,* 71 Cal.App.3d at 199 (selection of narrow project which morphed into much broader project frustrated CEQA's public information aim).

[. . .]

The petition for writ of mandate is denied.[2534]

Second, even if the Superior Court's decision were reversed in some respects, it is unlikely that this would require the County to set aside its adoption of the AVAP or its certification of the AVAP EIR. CEQA relief is permitted only in a case of prejudicial error, and "there is no presumption that error is prejudicial."[2535] In *Neighbors for Smart Rail v. Exposition Metro Line Const. Auth.* (2013) 57 Cal.4th at 463-65 (plurality op.) and 478 (Baxter, J., concurring and dissenting), the California Supreme Court found that an EIR used an impermissible baseline to analyze CEQA's most litigated topics (traffic, parking, and related vehicular emissions), but the EIR was not set aside because six of seven justices agreed that there was no prejudicial error. Moreover, even when a CEQA error *is* prejudicial, a court may "exercise its inherent equitable authority to maintain the status quo and allow the regulations to remain operative" pending compliance with CEQA, especially when "the environment [would] be given greater protection." (*POET, LLC v. Cal. Air Res. Bd.* 218 Cal.App.4th 681, 761-62 (2013) ("*POET I*"); see also *POET, LLC v. State Air Res. Bd.* (2017)12 Cal. App. 5th 52, 101 ("*POET II*"); see also Pub. Res. Code. § 21168.9(a)(2) [CEQA's remedies section only specifically authorizes a court to suspend project activities that both "prejudice the consideration or implementation of particular mitigation measures or alternatives" *and* "could result in an adverse change or alteration to the physical environment."].) In *POET I* and *POET II*, despite twice finding that the Air Resources Board failed to comply with CEQA when adopting a Low Carbon Fuel Standards regulation, the Court of Appeal twice found that the regulation should remain in place while the CEQA error was corrected because the environment would receive greater environmental protection if the regulation remained in effect than it would if the regulation were set aside. Here, as the Los Angeles Superior Court noted, "[t]he overarching purpose of the AVAP is to *preserve the natural environment and rural character of the Antelope Valley* while responding to the need for additional housing and employment."[2536] If the AVAP were set aside, the environment would be given substantially *less* protection, because the AVAP authorizes a much less concentrated development pattern of 106,180 dwelling units at full buildout, as compared to the now–superseded former Antelope Valley Areawide General Plan ("AVAGP"), which permitted 278,158 dwelling units at full buildout in the same area.[2537] For this reason, as the AVAP EIR notes (without dispute by CBD), the "No Project/Adopted Area Plan" alternative to the AVAP is environmentally inferior to the AVAP.[2538] Moreover, because CBD is only challenging certain amendments the Board of Supervisors made to the draft AVAP, and because CBD's "arguments implicitly concede the adequacy of the FEIR without the subsequent amendments,"[2539] CBD's challenge does not provide any basis upon which the AVAP as a whole could be set aside. In fact, Commenter CBD's own counsel made an extremely rare concession for a petitioner, acknowledging

[2534] AVAP Ruling, at pp. 17-21 [footnotes omitted] (citing AVAP Joint Appendix, at pp. AR 459, AR 30358-59); see also AVAP Joint Appendix, at p. AR 448
[2535] PRC § 21005(b)
[2536] AVAP Ruling, at p. 19 (emphasis added)
[2537] LACDRP 2014, p. 7-5
[2538] *Id*., p. 7-13
[2539] *Id.* p. 13

during trial that, for exactly these reasons, even if the petitioners prevail, "it may be a situation where remand without vacatur is appropriate."[2540]

Third, even in the unlikely event that CBD ultimately prevails in its lawsuit challenging the AVAP EIR, and even if the court set aside the Board's June 2015 approval of the AVAP, the Project would still be consistent with the County's General Plan. In October 2015, the Board of Supervisors approved a comprehensive 2035 General Plan Update, which explicitly incorporated the adopted AVAP as a component of the County's General Plan.[2541] No party challenged the County's October 2015 decision to adopt the 2035 General Plan Update, and so the relevant General Plan land use designations from the AVAP would remain in effect regardless of the outcome of CBD's challenge to the County's June 2015 AVAP approval. The statute of limitations to challenge the Board's October 2015 decision to approve the 2035 General Plan Update expired more than a year and half ago.[2542]

Fourth, even putting aside all of the above, even if the AVAP were set aside and the County were ordered to reinstate the previously operative AVAGP, the Project is also consistent with the AVAGP. The EIR discloses the speculative possibly that the AVAGP could be reinstated, and the EIR's analysis concludes that the Project would only require certain straightforward amendments to the AVAGP Land Use Policy Map, Hazards and Resources Map, Highway Plan Map and Trails Map to reflect the existence of the Centennial Specific Plan.[2543] None of these map amendments have any potential to cause a significant physical impact on the environment.[2544] With the exception of these straightforward revisions to the AVAGP, the Project is consistent with all applicable AVAGP policies and does not conflict with any policy in the AVAGP.[2545] Specifically, the Project would further:

1. **AVAGP Policy 6** ("Encourage growth in and adjacent to existing urban, suburban, and rural communities"). "The Project site is in the northernmost section of Los Angeles County. The Project site is near the communities of Gorman, Frazier Park and Neenach, south of Bakersfield and west of Lancaster. Although not located in or adjacent to an existing urban, suburban, or rural community, the Project is strategically located adjacent to 2 regional transportation facilities: the I-5 and the SR-138. The Project would ultimately improve the jobs-housing balance in the area and provide a variety of public, institutional, and recreational amenities, along with supporting infrastructure, allowing for opportunities for growth within the proposed Project, and creating a self-sustaining community. Additionally, because the Project site is located approximately 35 miles north of the nearest urban community (City of

[2540] AVAP Transcript, at p. 57.

[2541] See Resolution of the Board of Supervisors of the County of Los Angeles Relating to the Adoption of Project Number 02-305 General Plan Update (Oct. 6, 2015), at p. 4 ("All community-based plans are components of the General Plan," including the "Antelope Valley Area Plan"), at p. 6 ("In June 2015, the Board approved an update to the Antelope Valley Area Plan ("AV Plan Update"), a component of the General Plan Update").

[2542] Gov. Code § 65009(c)(1)

[2543] DRP 2017, pp. 5.8-71 to -73

[2544] *Lighthouse Field Beach Rescue*, 131 Cal.App.4th at 1207; Kostka & Zischke, § 12.34

[2545] *Id.,* pp. 5.8-71 to -73; see also generally Draft EIR, Appendix 5.8-A

Santa Clarita), development of the Project would not discourage additional growth in these areas, nor would it conflict with the intent of this policy."[2546]

2. **AVAGP Policy 26** ("Encourage an appropriate mix of land use types to prevent disharmony and degradation. Residential, commercial, employment, recreational and cultural uses should be integrated using appropriate buffering techniques to create a cohesive community."). "The Project provides for a community enhanced by careful placement of land use categories that promote the integration of a broad range of housing types; community support and employment uses; civic and educational amenities; and trails and greenways in a responsible, environmentally sensitive manner that is consistent with smart growth criteria. One of the primary purposes of the Project is to ensure orderly development, including addressing issues pertaining to land use compatibility. Site planning and building design, along with screening treatments (such as enhanced landscapes) would play an integral role in forming compatibility between uses, particularly in areas of clustered or mixed-use development. The Project locates the highest density residences nearest the village cores and town center and includes a Mixed-Use Overlay that allows for residences within commercial centers. This configuration would place larger populations in key centers, encouraging pedestrian activity and reduced vehicle trips. A system of Class I-IV bike lanes, community trails and greenway trails connects residential areas to village cores and the town center, parks, schools, and industrial areas, encouraging the use of alternative forms of transportation. The open spaces located on the periphery of the Project would remain natural and would act as buffers to sensitive areas beyond the Project boundary."[2547]

3. **AVAGP Policy 52** ("Encourage the development of socially and economically diverse communities.") "The provision of a wide range of housing types promotes social and economic diversity within Centennial."[2548]

4. **AVAGP Policy 71** ("Encourage and support local efforts to attract new industry to the Antelope Valley. While the aerospace and other government related industries should continue to remain as major employment generators, emphasis should also be given to attracting other types of employers.") "Over 597 acres are designated Business Park on the Project site to provide for employment uses such as light industrial, warehousing, manufacturing, high-tech, health care, professional office, and research and development activities. Schools, health care, commercial, and technology infrastructure would add to the employment base and supply the quality services that residents and businesses would use."[2549]

5. **AVAGP Policy 72** ("Actively support and promote equal employment for all residents of the Antelope Valley"). "Centennial proposes to create approximately 23,675 permanent jobs. Employment-inducing uses include, but are not limited to, light

[2546] (Draft EIR, Appendix 5.8-A, *Antelope Valley Areawide General Plan Consistency Analysis*, at p. 2.)
[2547] *Id.,* p. 6
[2548] *Id.,* p. 12
[2549] *Id.,* p. 14

industrial, warehouse, manufacturing, high-tech, health care, research and development, schools, hospitals, medical and professional offices, government facilities, commercial services, and retail uses. These types of uses would create job opportunities for Centennial and Antelope Valley residents from a wide range of economic and educational backgrounds."[2550]

6. **AVAGP Policy 73** ("Actively encourage and promote programs to provide adequate housing for all segments of the population"). "Most villages on the Project site offer a broad range of choices in living styles and housing types for citizens from a wide range of economic levels and age groups. Approximately 10 percent of the proposed residential units are designated as affordable housing. Also refer to Section 5.9 (Population, Housing, and Employment) of this EIR for additional discussion of the Affordable Housing Implementation Plan."[2551]

7. **AVAGP Policy 218** ("Encourage development of self-sufficient communities providing housing, employment and other opportunities"). "Centennial is planned to be a self-sustaining community with a variety of land uses, housing densities, and development intensities. The Project provides for a broad range of housing types through a wide range of residential densities. Additionally, almost 597 acres of business park land uses would provide employment opportunities for light industrial, warehouse, manufacturing, high-tech, health care, and research and development activities, as well as sites reserved for corporate headquarters. All communities have diverse types of interconnected recreational spaces and pedestrian-friendly core areas with a broad range of commercial and social opportunities. The Project locates villages surrounded by open spaces. Village cores combine commercial, public, recreational, and cultural uses within convenient walking distance to most households. The location of a variety of housing types serving a range of income levels adds to the complexity of uses, contributing to the vitality and cohesiveness of villages, promoting a livable environment and strong social infrastructure with accessible design amenities."[2552]

This is just a small subset of the numerous AVAGP policies that the Project would further.[2553] Accordingly, the EIR's analysis demonstrates that "[t]he Project would have less than significant land use impacts with the AVAGP plan amendments, zone change and other associated entitlements."[2554] As discussed in response to Comment F.8-227, the County's determination that the Project is generally consistent with the AVAGP as a whole must be affirmed unless "no reasonable person" could agree with the determination, bearing in mind the County's authority to weigh potentially inconsistent policies against the numerous AVAGP policies that the Project would further. And even if the Project were inconsistent in some respects with the AVAGP (which it is not), this would only present a CEQA issue to the extent the inconsistency would cause "physical impacts on the environment."[2555] Even if the

[2550] *Ibid.*
[2551] *Ibid.*
[2552] *Id.,* p. 35
[2553] *Id.,* pp. 5.8-71 to -73; see also generally Draft EIR, Appendix 5.8-A
[2554] *Id.,* p. 5.8-73
[2555] CEQA § 21080(e)(2)

AVAGP were to be reinstated, Project would not cause any significant impacts on the environment from land use conflicts.

Response to Comment F.8-230:

Please see response to Comment F.8-227. Irrespective of whether the Project conflicts with any particular General Plan provision, "[a]n agency . . . has the discretion to approve a plan even though the plan is not consistent with all of a specific plan's policies."[2556] "General plans ordinarily do not state specific mandates or prohibitions."[2557] This comment does not identify any General Plan goal or policy with which the Project would supposedly conflict. When summarizing some of the General Plan's overarching concepts, the Draft EIR states that "[t]he Land Use Element of the County General Plan also promotes land use compatibility through complementary land uses that promote a balanced distribution of jobs, housing and services within the overall Project site."[2558] The Draft EIR demonstrates that "[t]he Project implements this important General Plan concept by locating commercial areas, schools, and parks at the village cores to serve the demand for goods and services and meet the educational and recreational needs of the residents of the individual villages and balance the distribution of jobs, housing, and services within each village."[2559] The Commenters' unsubstantiated disagreement with this conclusion does not demonstrate the Project's inconsistency with *any* General Plan goal or policy, to say nothing of demonstrating the Project's inconsistency with any goal or policy containing "the type of specificity and clarity" necessary to render a Project inconsistent with the General Plan as a whole.[2560] The County has "broad discretion to construe its [General Plan] policies in light of the plan's purposes,"[2561] and the County's determination that the Project is generally consistent with the General Plan as a whole is at least reasonable, and therefore "must be upheld."[2562]

The Project is, in fact, fully consistent with the Land Use Element's provisions promoting balanced development. Please see responses to Comments F.8-7 through F.8-9, F.8-20 through F.8-33, and F.8-231. As these responses and the Draft EIR explains, the Project is designed to maximize vehicle capture rate and improve the County's jobs-housing balance, and the Project has been situated and designed to promote regional "smart growth" planning principles established in SCAG's RTP-SCS and the County's AVAP. There is nothing in the County's Land Use Element that establishes any specific average trip length for approved projects; it is important to note that Los Angeles County covers an area roughly the size of Rhode Island, with distances between cities such as Lancaster and Long Beach that are far greater than the trip length described by the Commenters. Please see responses to Comments F.8-11 through F.8-14. As these responses and the Draft EIR explain, the Project will site necessary infrastructure and employment opportunities concurrently with, and in close proximity to, residential development, utilizing a phased development approach. As

2556 *Sierra Club*, 121 Cal. App. 4th at 1511
2557 *Naraghi Lakes*, 1 Cal.App.5th at 17
2558 DRP 2017, p. 5.8-20
2559 *Ibid.*
2560 *S.F. Tomorrow*, 228 Cal. App. 4th at 520
2561 *Pfeiffer*, 200 Cal.App.4th at 156
2562 *CNPS*, 172 Cal.App.4th at 637

these responses explain, building in appropriate flexibility to respond to market conditions is both a sound planning principle and an approach explicitly endorsed under CEQA.

Response to Comment F.8-231:

The Project would not site people dozens of miles from employment, and neither would it extend residential development with limited or no infrastructure. To the contrary, the Project is specifically designed to develop housing opportunities concurrently with, and in close proximity to, employment opportunities and infrastructure, consistent with the County General Plan and with good planning principles. Please see responses to Comments F.8-7 through F.8-9, F.8-20 through F.8-33, F.8-227, F.8-230, and F.8-232.

Jobs-housing ratio is discussed on pages 5.9-30 through 5.9-31 in Section 5.9, Population, Housing and Employment, of the Draft EIR. As discussed in Section 5.9, while the Project anticipates as many as 19,333 dwelling units to be built on the site, with a buildout population of approximately 57,150 residents, it also estimates that 23,675 permanent jobs would be created by non-residential developments on the site. These developments include planned commercial areas, business parks, schools, parks, library, fire stations, LASD substation/station, wastewater reclamation facilities, water system facilities and other public facilities that would be built as part of the Project. Residents of the Project would have the option to obtain goods and services within the site and could locate their business or place of employment at the designated commercial and business park areas. Employees at the site would also have the option to find housing within the Project. The Project has been specifically designed so that people can work and live within the Project site and not have to travel as often or longer to obtain goods, services and employment.

As stated on page 5.9-31, the Project would have an on-site jobs-housing ratio of 1.22 at buildout and would positively contribute to the attainment of the target jobs/housing ratio of 1.3 jobs per dwelling unit for the unincorporated area of the Antelope Valley, which the AVAP states is "a far improvement from the ratio of approximately one job for every five households established by the previous 1986 Antelope Valley Areawide General Plan."

The Project includes the construction of on-site public facilities (e.g., fire stations, sheriff's stations, schools, and parks), utility service systems and infrastructure (e.g. water system, sewer system, storm drainage, electrical and natural gas line extensions and upgrades), an internal roadway system and off-site roadway improvements (through implementation and funding of needed offsite improvements in accordance with the proposed Traffic Mitigation Agreement, Traffic Mitigation Fee Program or an assessment district, and payment of fair share fees), and a Mobility Plan that includes two transit hubs and creation of a Transportation Management Association (TMA) to specifically develop strategic linkages with other TMAs in order to maximize transit efficiencies and services. Thus, the residential uses of the Project would be accompanied by public facilities and services, infrastructure, utility and public transit improvements to ensure that the Project will not result in "sprawl" development. As discussed in response to Comment F.8-20, the Project has been situated and designed to promote regional "smart growth" planning principles established by SCAG's RTP/SCS and the Antelope Valley Area Plan, and SCAQMD has specifically determined that

the Project's *Centennial Specific Plan* "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (*see* Comment D.4-2).

Response to Comment F.8-231A:

This footnote 41 refers to the Los Angeles County General Plan, which is used as the source of Comment F.8-231. The comment references the definition of Jobs-Housing Balance and the general discussion of the Impacts of Suburban Sprawl in the County General Plan. Response to Comment F.8-231 addresses the information in this referenced document. It should be noted that the selection from the General Plan quoted in this comment are not from any General Plan goal or policy; this is explanatory text explaining the concept of "jobs-housing balance."

Response to Comment F.8-232:

Please see responses to Comments F.8-7 through F.8-9, F.8-20 through F.8-33, F.8-227, F.8-230, and F.8-231. Irrespective of whether the Project creates any tensions with General Plan Goal LU 3, "[a]n agency . . . has the discretion to approve a plan even though the plan is not consistent with all of a specific plan's policies."[2563] As explained in response to Comment F.8-227, the County's determination that the Project is, on balance, consistent with the County General Plan, is at least reasonable, and therefore must be affirmed, in light of the County's "broad discretion to construe its policies in light of the plan's purposes."[2564]

Regardless, as explained in the responses to the comments cited immediately *supra*, especially response to Comment F.8-20, the Project is, in fact, fully consistent with General Plan Goal LU 3. The Project site is already served by backbone regional infrastructure, which has long been planned and approved, and none of the Project's backbone infrastructure will be sized to accommodate growth beyond that which is proposed by the Project. Given its clustered development pattern and self-contained infrastructure improvements, the Project does not exhibit the characteristics of sprawl development. Accordingly, the Project is consistent with Goal LU 3 of the County General Plan.

Finally, it should also be noted that the question of whether development of the Project site is consistent with the County's General Plan has been resolved with finality on at least two previous occasions. As described in responses to Comments F.8-229 and F.8-233, in October 2015, the County Board of Supervisors incorporated the adopted AVAP – including the designation of the Project site as an EOA not subject to SEA regulations - as a component of the County's General Plan. No party challenged this action in any respect, and the statute of limitations to do so expired more than a year and half ago.[2565] In addition, although CBD did challenge the County's June 2015 certification of the AVAP EIR, neither CBD nor any other party brought any suit arguing that the County's June 2015 AVAP adoption conflicted with

[2563] *Sierra Club*, 121 Cal. App. 4th at 1511
[2564] *Pfeiffer*, 200 Cal.App.4th at 1563
[2565] Gov. Code § 65009(c)(1)

the County's General Plan, and the statute of limitations to bring any such challenge has also expired.

Response to Comment F.8-233:

Please see response to Comment F.8-227. AVAP Land Use Goal LU 2 is "[a] land use pattern that protects environmental resources." Like most general plan goals and policies, this goal "do[es] not state specific mandates or prohibitions."[2566] The County's determination that the Project's land use pattern will protect environmental resources is at least "reasonable," and therefore must be upheld, bearing in mind that the County is entitled to "great deference" in construing its own general plan and that the County is entitled to weigh and balance potentially conflicting goals and policies.

Moreover, there is more than ample substantial evidence that the project's features and mitigation measures, as well as the SEAs and other related laws, regulations and commitments applicable to the AVAP and to the Centennial project, will "protect environmental resources." As the County has explained:

> The keystone of the AVAP is its "Rural Preservation Strategy." The Strategy strives to achieve a balance between maintaining rural character and developing additional infrastructure. Specifically, the AVAP seeks to guide new economic growth and development into three "Economic Opportunity Areas" ("EOAs") while preserving areas outside the EOAs and existing town areas with new Open Space and Land Use policies, new low-density land use designations, and *over 200,000 new acres* of designated Significant Ecological Areas ("SEAs"), where the County will require additional scrutiny of biological resources prior to approval of future development.
>
> [. . .]
>
> SEAs are officially designated areas in the County identified for their biological value. Though CBD attempts to characterize the County's approval of the AVAP as a reduction in SEA acreage, the adopted AVAP actually *expands* the SEA designation within the Antelope Valley *by more than 200,000 acres*. (AR 651-652; AR 30368.)
>
> Projects proposed within SEAs must obtain a Conditional Use Permit ("CUP") and are subject to review by the SEA Technical Advisory Committee ("SEATAC"). (AR 669; County Code, Sec. 22.56.215, County's Request for Judicial Notice ["RJN"], Exh. A.) SEATAC is an advisory committee to the County Department of Regional Planning consisting of experts who specialize in various areas of biology and advise the County on a project's compatibility with the SEA. (AR 669.) The County's SEA Program is designed "to preserve the genetic and physical diversity of the County by designing biological resource areas capable of sustaining themselves into the future." (AR 455, 592, 650-

[2566] *Naraghi Lakes*, 1 Cal.App.5th at 17

> 651.) Thus, the vastly expanded SEAs adopted as part of the AVAP will greatly benefit biological resources in the Antelope Valley and beyond. (AR 668.)[2567]

As the County has also explained:

> The AVAP's Rural Preservation Strategy will focus new economic growth and development into three "Economic Opportunity Areas." The Strategy identifies four types of environment that serve different purposes: (1) Rural Town Centers, envisioned as including new locally oriented public facilities and commercial uses; (2) Rural Town Areas, envisioned as including new residential development consistent with existing community character and allowing for light agricultural, equestrian, and animal-keeping uses; (3) Rural Preserve Areas, which are largely undeveloped and not served by existing or planned infrastructure, and where' development would be limited to single family homes at very low densities and light and heavy agricultural uses; and (4) Economic Opportunity Areas (EOAs), which have "tremendous potential for economic growth and development" due in large part to two major infrastructure projects in the Antelope Valley proposed by Los Angeles County Metropolitan Transportation Authority and the California Department of Transportation: the High Desert Corridor project and the Northwest 138 Corridor Improvement project. (AR 30229-31, 30239-42.)
>
> The AVAP identifies three EOAs: East, Central, and West EOAs. (AR 30242; 30361.) All three EOAs are located along the proposed route of the two infrastructure projects mentioned above. (AR 30358-59.) Under the AVAP, "any development induced by these two infrastructure projects should be guided to the [EOAs] so that the areas around them can be preserved and maintained at low density, or agricultural uses ... to balance the growth and development which the two projects will undoubtedly bring with the general intent of [the] Area Plan to preserve the ecological and rural character of the Antelope Valley." (AR 30231.) Thus, the EOAs "provide an opportunity for the Area Plan to maximize the investment that state and regional agencies are bringing into the area, while still achieving the fundamental goal of rural preservation in the Antelope Valley."[2568]

With respect to the West EOA specifically:

> [The AVAP imposes n]ew requirements for certain parcels within the West EOA to complete "a Specific Plan or similar planning activity" within five years or else "the Department of Regional Planning may initiate a Community Plan for the West EOA. (AR 30307-30308.)

[2567] County AVAP Br. at pp. 1-3 (citing AVAP Joint Appendix at pp. AR 455, 492, 650-52, 669, & 30368); see also AVAP Joint Appendix at pp. AR 396, 1113 & 22675.

[2568] County AVAP Br. at pp. 3-4 (citing AVAP Joint Appendix at pp. AR 30229-31, 30239-42, 30358-59).

> [. . .]
>
> A significant portion of developable area within the West EOA is further protected by a "Natural Resource Protection and 'Smart Design' Program" adopted as part of the 2008 Tejon Ranch Conservation & Land Use Agreement between the landowners and environmental groups. (AR 9835, 9963, 10069-10073.) This Program requires the proposed "Centennial" project to set aside 3,450 acres as Open Space, as well as various other measures designed to protect the area's ecosystem, scenic resources, water supply, water quality, and other natural resources. (AR 10069-73.)
>
> [. . .]
>
> Critically, and overlooked by CBD, when the County modified the originally-proposed SEAs, it kept in place, *and ultimately adopted,* proposed land use designations that convert most of the areas previously designated for one dwelling unit per acre (N1 and N2) to one dwelling unit per 20 acres (RL20), thus drastically reducing permitted density. (AR 2785; AR 30241, 30243; AR 30358-59.) These areas are also "severely constrained by fault zones, seismic areas and Hillside Management Areas which further limit potential development." (AR 2785.) The AVAP also designates significant portions of the West EOA as OS-C (Open Space Conservation) and strategically applies the Rural Town Area label to direct growth and help preserve more environmentally sensitive areas. (AR 2786; AR 30358, 30361.)[2569]

Because the AVAP "substantially reduces development intensity within the proposed Significant Ecological Areas (SEAs) by converting most of the areas designated for residential development from N1 – Non Urban 1 (0.5 dwelling units/acre) and N2 –Non Urban 2 (1 dwelling unit/acre) to RL20 – Rural Land 20 (1 dwelling unit/20 acres) . . . [t]he existing zoning code regulations that are currently in place, including the SEA Ordinance, will be able to regulate developments in these areas so that biological resources are adequately protected."[2570] Accordingly, the County Board of Supervisors found and concluded that the AVAP's SEA designations "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development," and that "[t]he SEA Program seeks to preserve the genetic and physical diversity of biological resources by designing self-sustaining biological resource areas," that the AVAP "will expand the number of SEAs in the Project area, and the SEA land area will increase from the current 134,745 acres to 356,773 acres."[2571] The Los Angeles Superior Court upheld these and other findings by the Board of Supervisors as supported by substantial evidence.[2572]

[2569] County AVAP Br. at pp. 5 and 10 (citing AVAP Joint Appendix at pp. AR 2785-86, 9835, 9963, 10069-73, 30241, 30243, 30307-08, 30358-59, 30361

[2570] DRP 2014a, p. 2-13

[2571] AVAP Joint Appendix, at pp. AR 227 and AR 263

[2572] AVAP Ruling, at pp. 19-20

Moreover, the Project site has long been identified for development in several different approved plans. The Southern California Coalition of Governments approved its 2012-2035 RTP/SCS in 2012, and then subsequently approved its 2016-2040 RTP/SCS in 2016, both of which target the Project site for future growth.[2573] In addition, in June 2015, the Board of Supervisors explicitly incorporated the approved AVAP, including the designation of the Project site for development, into the County's General Plan.[2574] CBD failed to challenge any of these determinations.

Moreover, the development of the Project site is also analyzed in several certified EIRs, none of which were challenged by any party, including CBD. In addition to the EIRs for the 2012-2035 and 2016-2040 RTP/SCSs, the Project site is also analyzed in Caltrans' certified EIR for the Northwest 138 Corridor Improvement Project.[2575] CBD did not challenge any of these EIR certifications, and accordingly those EIRs are now "conclusively presumed to comply" with CEQA.[2576]

CBD did challenge the County's June 2015 certification of the AVAP EIR, but CBD only argued – unsuccessfully - that the EIR was inadequate to cover certain amendments the Board of Supervisors adopted to the version of the AVAP that was presented to the Board in November 2014. As the Los Angeles Superior Court explained:

> CBD's briefs overlook the purpose of the amendments, which was to rectify an inconsistency. As the County argues (Opp. at 1), the draft AVAP was inconsistent in addressing land within an EOA, and by definition targeted for growth, and yet was subject to new, more restrictive growth policies for SEA, rural areas preservation, and other policies. The FEIR does not state that the presence of SEAs within the EOAs is a necessary mitigation factor. Instead, the FEIR states that the Project would focus new development within the EOAs in order to avoid development within SEAs. AR 668-69. *Thus, it is clear that the Project always was intended to cause development within the EOAs* and that the restrictions for SEAs, Land Use, Conservation and Open Space policies limiting development, and Rural Preserve Areas within EOAs would impede this intent.[2577]

CBD only challenged these later amendments to the AVAP, and CBD's challenge "concede[s] the adequacy of the [AVAP] FEIR" with respect to the pre-amendment version of the AVAP

2573 DRP 2017, pp. 5.8-73 to -74, 5.9-27 to -32

2574 See Resolution of the Board of Supervisors of the County of Los Angeles Relating to the Adoption of Project Number 02-305 General Plan Update (Oct. 6, 2015), at p. 4 ("All community-based plans are components of the General Plan," including the "Antelope Valley Area Plan"), at p. 6 ("In June 2015, the Board approved an update to the Antelope Valley Area Plan ("AV Plan Update"), a component of the General Plan Update").

2575 Caltrans 2017, Northwest State Route 138 Corridor Improvement Project Final Environmental Impact Report/Environmental Impact Statement and Section 4(f) Evaluation, at, e.g., pp. 31, 47, 55, 83, 180, 336-37, 371, 400, 420.

2576 CEQA § 21167.2

2577 AVAP Ruling, at p. 16 (emphasis added) (citing County AVAP Br. at p. 1 and AVAP Joint Appendix at pp. AR 668-69); see also AVAP Transcript, at pp. 19-20 (Court: ". . . it seemed to me the purpose of the amendment was to negate an inconsistency between the project[] and the EIR's analysis in the sense that . . . we wanted the development to occur in this EOA area and, yet, we have these restrictions including SEA that inhibit the development, therefore we want to get rid of that inconsistency. Isn't that the purpose of the amendment?"; CBD's counsel: "*We don't disagree with that.*" [emphasis added].

presented to the Board in November 2014."[2578] But as the Superior Court held, it is "clear" that *even the version of the AVAP presented in November 2014* was intended to cause development in the West EOA, and the effects of that development were fully and sufficiently analyzed in the AVAP FEIR. CBD has clearly conceded that the AVAP EIR sufficiently analyzes the November 2014 draft version of the AVAP, and therefore CBD cannot, in any subsequent proceeding, argue that the development of the Project site has been insufficiently analyzed under CEQA. (See CEQA § 21167.2 [EIRs are "conclusively presumed to comply" with CEQA insofar as they are not challenged by any party within the applicable statute of limitations].)

In addition to being barred under CEQA, basic principles of *res judicata* and collateral estoppel also prohibit commenters from challenging the designation of the Project site for development. "Res judicata bars not only the reopening of the original controversy, but also subsequent litigation of all issues which were or *could have been* raised in the original suit." *Thompson v. Ioane* (2017) 11 Cal. App. 5th 1180, 1191 (citation omitted). The related doctrine of "issue preclusion," or [collateral estoppel] separately "precludes relitigation of issues argued and decided in prior proceedings."[2579] CBD cannot, in any future proceeding, re-litigate the issues argued and decided in the AVAP litigation, which deprives it of any ability to challenge the designation of the West EOA for development. Moreover, having failed to even attempt to avail itself of several opportunities to challenge the designation of these lands for development, CBD's claim is no longer legally viable.

With respect to the Ranch-Wide Agreement (TRCRWA), please see responses to Comments F.8-50, F.8-51, F.8-177, and F.8-181. Enforceability of the TRCRWA spans Kern and Los Angeles County boundaries and is enforceable by five different non-governmental organizations: Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club. Many aspects of the TRCRWA are also enforceable by the State Wildlife Conservation Board, which purchases conservation easements pursuant to the TRCRWA.

Response to Comment F.8-234:

Please see response to Comment F.8-227. Irrespective of whether the Project creates any tension with Goal LU 3, Policy LU 3.1 or Policy 3.5, "[a]n agency . . . has the discretion to approve a plan even though the plan is not consistent with all of a specific plan's policies",[2580] and are authorized to '"weigh and balance the various policies when considering project compliance."[2581]

Regardless, the Project does not conflict with Goal LU 3, Policy 3.1 or Policy 3.5, or any other AVAP policies related to natural hazards. The Project's Geologic Safety Zone requires a 100-foot setback from active faults, and the Project's Floodplain Safety Zone precludes most structures in the 100-year floodplain. Most steep-sloped land south of SR-138 and at the western portion of the site is designated for open space, and Project Design Features and

[2578] AVAP Ruling, at p. 13
[2579] *Zevnik v. Superior Court* (2008) 159 Cal. App. 4th 76, 82
[2580] *Sierra Club*, 121 Cal. App. 4th at 1511
[2581] *San Francisco Tomorrow*, 228 Cal. App. 4th at 1252

Mitigation Measures have been implemented to reduce risks from Valley Fever and wildfire. Please see Draft EIR, Section 5.8, *Land Use, Entitlements and Planning*, at pages 5.8-26, and responses to Comments F.8-206 through F.8-211. Goal LU 3 is "[a] land use pattern that minimizes hazards." Like most general plan goals and policies, this goal "do[es] not state specific mandates or prohibitions."[2582] Accordingly, the County has properly concluded that that the Project "minimizes hazards," in light of the County's "broad discretion to construe its policies in light of the plan's purposes."[2583] Moreover, Policies 3.1 and 3.5's more specific restrictions apply "except within economic opportunity areas." The Project is located in the West Economic Opportunity Area.

Response to Comment F.8-235:

This comment's assertion that the Project is inconsistent with AVAP Goal LU 5, and Policies LU 5.1 through LU 5.4, of the AVAP is noted and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. Please see response to Comment F.8-227 for a discussion of the great deference afforded a lead agency's general plan consistency determination. Even if the Project did create any tension with Goal LU 5, or Policies LU 5.1 through LU 5.4, "[a]n agency . . . has the discretion to approve a plan even though the plan is not consistent with all of a specific plan's policies",[2584] and are authorized to '"weigh and balance the various policies when considering project compliance."[2585] Regardless, the Project does not conflict with Goal LU 5 or Policies LU 5.1 through LU 5.4, or any other policies related to land use patterns that decrease GHG emissions, as discussed below.

Goal LU 5 establishes an AVAP goal of "[a] land use pattern that decreases greenhouse gas emissions." As discussed in the Draft EIR, the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County's Antelope Valley Area Plan (AVAP) for the purpose of sustainability accommodating regional growth projections in a manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP's Rural Preservation Strategy. Indeed, the South Coast Air Quality Management District (SCAQMD) has determined that the Project's Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D4-2). Thus, the Project is consistent with AVAP Goal LU 5. See responses to Comments F.8-20 and F.8-204 for further discussion.

Policy LU 5.1 establishes an AVAP policy to "[e]nsure that development is consistent with the Sustainable Communities strategy adopted in 2012, and element of the Regional

[2582] *Naraghi Lakes*, 1 Cal.App.5th at 17
[2583] *Pfeiffer*, 200 Cal.App.4th at 389
[2584] *Sierra Club*, 121 Cal. App. 4th at 1511
[2585] *San Francisco Tomorrow*, 228 Cal. App. 4th at 1252

Transportation Plan developed by the Southern California Association of Governments."[2586] The approved SCAG RTP/SCS designates the Project site for future urbanized development, and the Draft EIR describes the Project's consistency with the RTP/SCS in Section 5.8, Land Use,[2587] Section 5.9, Population, Housing and Employment,[2588] Section 5.11, Air Resources,[2589] and Section 5.21, Climate Change.[2590] As discussed in the Draft EIR, no conflict with SCAG's regional growth projections would occur since SCAG's growth projections anticipates increases in population, households, and employment in the North Los Angeles Subregion and future household and employment projections for the area that includes the Project site are consistent with the housing and employment estimates for the Project.[2591] Thus the Project is consistent with AVAP Policy LU 5.1. See also response to Comment F.8-20 for a more detailed discussion of the Project's consistency with the SCAG 2012 and 2016 RTP/SCS balanced land use plan.

Policy LU 5.2 establishes an AVAP policy to "[e]ncourage the continued development or rural town centers that provide for the daily needs surrounding residents, reducing the number of vehicle trips and providing local employment opportunities." As discussed in the Draft EIR, the Project has been situated and designed to promote regional "smart growth" planning principles established by the AVAP. Consistent with those principles, Medium- to Very High Density development is generally included in the central area of each of the Project's proposed Villages, and the density of development progressively lowers with increased distances from core areas, called the Village Core, Town Center or Neighborhood Center.[2592] The Town Center of the Project is located in Village 3, and is the "downtown" area of the Project; Villages 1, 2, 5, and 7 each have a Village Core, and Villages 6, 8, and 9 each have a Neighborhood Center.[2593] An 80 percent average, but not less than 50 percent of all residential units will be located within ½ mile of a Village Core or the Town Center.[2594] In addition, non-motorized transportation planning elements are integrated into the Centennial Mobility Plan to encourage non-automotive transit modes and provide safe routes to school. The plan's backbone is the community trail system (described in Specific Plan Section 3.11.7, Trails Plan) that provides shared-use pathways for bicycles, pedestrian and, in some cases, equestrian activities. Bikeways are classified into four categories that are described in Specific Plan Section 3.2.4 and shown on Specific Plan Figure 3-3, *Bicycle Network*. These passageways are designed to avoid roadway crossings to the extent feasible and to give easy access to retail, jobs and other amenities. Thus, the Project is consistent with AVAP Policy LU 5.2. See also response to Comment F.8-204.

Policy LU 5.3 establishes an AVAP policy to "[p]reserve open space areas to provide large contiguous carbon sequestering basins." The Project preserves large swaths of natural landscape and biological resource areas. Approximately 5,624 acres (approximately

2586 DRP 2015, p. LU-5
2587 DRP 2017, p. 5.8-73
2588 *Id.,* pp. 5.9-23 through 32
2589 *Id.,* pp. 5.11-74 through 75
2590 *Id.,* p. 5.21-85 through 86
2591 *Id.,* p. 5.8-73
2592 *Id.,* p. 4-16
2593 *Ibid.*
2594 *Id.,* pp. 4-16, 17

45.6 percent) of the 12,323-acre Project site are proposed for open space for natural resource protection and greenways, and parks for active and passive recreational use.[2595] Per PDF 5-1, the Project would also accommodate 50 acres of small-scale agriculture and related uses, including, but not limited to community gardens, farmers markets/produce stands, growing and sales of nursery stocks, and commercial greenhouses.[2596] The Project would not include large-scale, high-emission agricultural operations, and the planned small, local operations would have very low emissions and would provide carbon sequestration benefits. In addition, the Project implements the AVAP's Rural Preservation Strategy by focusing future development within the AVAP-designated West EOA, thus preserving the rural character of the AVAP planning area outside of EOAs, as discussed in more detail in response to Comment F.8-20. Thus, the Project is consistent with AVAP Policy LU 5.4.

Policy LU 5.2 establishes an AVAP policy to "[e]nsure that there is an appropriate balance of residential uses and employment opportunities within close proximity of each other." As discussed in the Draft EIR, the location of the Project and the proposed residential and non-residential uses have been planned for a balance between the number of jobs available and the number of on-site housing units in an effort to encourage local trips and reduce vehicle miles traveled. The approximate 10.1 million square feet (sf) of commercial office, shopping center, and industrial land uses proposed by the Project will provide approximately 20,809 jobs, many of which are anticipated to be filled by future Project residents.[2597] The Project includes residential development to create a mixed-use community within the West EOA, consistent with the Land Use Policy Map in the AVAP. The Project would contribute to meeting the State-mandated Regional Housing Needs Assessment (RHNA) housing production goals for the unincorporated areas of the County and would be consistent with the regional effort to boost housing production to meet regional housing needs.[2598] The AVAP intends to provide an overall jobs/housing ratio of 1.3 jobs per dwelling unit in the unincorporated area of the Antelope Valley. The Economic Development Element of the AVAP sets a strategy of designating areas for light and heavy industrial uses near major transportation corridors and/or a concentration of skilled labor force in EOAs; The Project would implement this strategy, and would provide an estimated jobs/ housing ratio of 1.22, through the development of commercial and business park uses on the site, for use by high-tech manufacturing, transportation, and logistics companies.[2599] Thus the Project is consistent with AVAP Policy LU 5.4.

As discussed in response to Comment F.8-227, even if the Project were inconsistent with AVAP Goal LU 5 or Policies LU 5.1 through LU 5.4 (which is not the case), this would only present a CEQA issue to the extent the inconsistency would cause "physical impacts on the environment."[2600] The Commenter provides their opinions disputing the County's legal determination of plan consistency, but the Commenter does not identify how the alleged inconsistencies would cause any significant physical impacts on the environment that are

[2595] *Id.,* p. 4-6
[2596] *Id.,* p. 5.5-12
[2597] *Id.,* p. 5.11-36
[2598] *Id.,* pp. 5.9-2, 3
[2599] *Id.,* p. 5.9-3
[2600] CEQA § 21080(e)(2)

distinct from the impacts analyzed, as required pursuant to CEQA, in the other sections of the Draft EIR. The Draft EIR fully discloses, analyzes and mitigated the Project's potentially significant physical impacts on the environment in compliance with CEQA.

Response to Comment F.8-236:

Please see response to Comment F.8-227. Irrespective of whether the Project conflicts with this particular policy, "[a]n agency . . . has the discretion to approve a plan even though the plan is not consistent with all of a specific plan's policies",[2601] and are authorized to "weigh and balance the various policies when considering project compliance."[2602]

Regardless, the Project does not contradict Policy LU 5.3. The County, which has "broad discretion to construe its policies in light of the plan's purposes",[2603] appropriately views the Project's contribution to open space preservation within the overall context of the AVAP, which "seeks to guide new economic growth and development into three "Economic Opportunity Areas" ("EOAs") while preserving areas outside the EOAs and existing town areas with new Open Space and Land Use policies, new low-density land use designations, and o*ver 20,000 new acres* of designated Significant Ecological Areas ("SEAs"), where the County will require additional scrutiny of biological resources prior to approval of future development."[2604] The Project site alone will "set aside 3,450 acres as Open Space," and the "AVAP also designates significant portions of the West EOA as OS-C (Open Space Conservation) and strategically applies the Rural Town Area label to direct growth and help preserve more environmentally sensitive areas."[2605] The County also views the Project's contribution to open space within the larger context of the multiple overlapping layers of open space preservation surrounding the Project site and surrounding the AVAP. As the County Board of Supervisors has noted and found, the AVAP immediately borders "the Angeles National Forest . . . to the south," and "includes part of the Los Padres National Forest, as well as federal, State, and County parks and recreation areas," all of which are governed by their own federal, State and County-level protections.[2606] The Ranch-Wide Agreement even further supplements these already considerable open space protections, and as described in responses to Comments F.8-50, F.8-51, F.8-177, F.8-181, and F.8-233, the Draft EIR appropriately considers the Ranch-Wide Agreement.

Policy LU 5.3 endorses a general policy to "[p]reserve open space areas to provide large contiguous carbon sequestering basins." This policy, like most general plan goals and policies, "do[es] not state specific mandates or prohibitions."[2607] In light of the significant open space preservation on the Project site, in the AVAP, and in the surrounding area, the County's determination that the Project is consistent with the County's open space

[2601] *Sierra Club*, 121 Cal. App. 4th at 1511
[2602] *San Francisco Tomorrow,* 228 Cal. App. 4th at 1252
[2603] *Pfeiffer*, 200 Cal.App.4th at 389
[2604] County AVAP Br. at p. 1.
[2605] *Id.,* pp. 5, 10
[2606] AVAP Joint Appendix at p. AR 000227.
[2607] *Naraghi Lakes*, 1 Cal.App.5th at 17

preservation policy is at least reasonable, and therefore must be affirmed, in light of the County's "broad discretion to construe its policies in light of the plan's purposes."[2608]

Response to Comment F.8-237:

Please see response to Comment F.8-227. Irrespective of whether the Project creates any tension with the plan goals and policies cited by the Commenters, "[a]n agency . . . has the discretion to approve a plan even though the plan is not consistent with all of a specific plan's policies",[2609] and are authorized to '"weigh and balance the various policies when considering project compliance."[2610]

Regardless, the Project is, in fact, consistent with the plan goals and policies cited by the Commenters because the Project has many features designed to promote alternatives to automobile travel. Please see responses to Comments F.8-19 through F.8-33. Moreover, as the County previously determined in the AVAP EIR (without dispute by the Commenters), the adopted AVAP, including the development of the Project within the West EOA, "reduces projected residential units and associated population by 62 percent and increases employment by 62 percent" relative to projected growth under the previously adopted AVAGP. Because the AVAP "directs future development to three EOAs" such as the West EOA that includes the Project site, and because the AVAP "implements a Rural Preservation Strategy for the balance of the Project Area," development contemplated in the AVAP, including the Project, will result in less traffic, over a smaller area, than would occur in the absence of the AVAP and the Centennial Specific Plan.[2611]

In light of the AVAP's concentrated development pattern, and the Project's many features designed to promote mobility, the County has reasonably determined that the Project is consistent with the AVAP's mobility goals and policies. This determination is at least reasonable, and therefore must be affirmed, in light of the County's "broad discretion to construe its policies in light of the plan's purposes."[2612]

Response to Comment F.8-238:

This comment inaccurately summarizes the Project's water supply and the consistency of the Project with County water-related planning goals. Contrary to the comment, and as discussed in more detail in response to Comment F.8-212, the Project has a sustainable water supply. The Project's water supplies are discussed in Section 5.18, Water Resources. As discussed on Draft EIR pages 5.18-2 and 5.18-51 to 5.18-67, and as summarized in Tables 5.18-10 to 5.18-12 for normal or average, single dry, and multiple dry years, the Project will utilize several water supplies and on- and off-site water banking facilities to meet potable demand. Available supplies include groundwater and imported water return flows in accordance with the approved Antelope Valley Adjudication Judgment and Physical Solution; State Water Project (SWP) supplies secured for Project use and imported to the site

2608 *Pfeiffer*, 200 Cal.App.4th at 1563
2609 *Sierra Club*, 121 Cal. App. 4th at 1511
2610 *San Francisco Tomorrow*, 228 Cal. App. 4th at 1252
2611 DRP 2014a, p. 7-12
2612 *Pfeiffer*, 200 Cal.App.4th at 1563

under an agreement with the Antelope Valley – East Kern Water Agency (AVEK); and AVEK service area deliveries. Indoor wastewater will be conveyed to one of two Project on-site treatment facilities; will be treated to State unrestricted reuse standards; and will be distributed to meet approximately 40 percent of buildout water demand. The Project's water supplies will sustainably meet buildout potable and recycled water demands and will maintain an average annual reserve supply of more than 79,000 acre-feet, or more than 11 years of full-buildout potable water demand, after buildout has been achieved.

The analysis of the Project's water supplies is consistent with and based on the most current projections prepared by state and regional public agencies with specific expertise and responsibility for analyzing water supplies, including imported and ground water, under applicable laws, regulations and policies. The Project's use of recycled water is consistent with state and regional policies, rules and regulations that encourage the use of recycled water to reduce demand for potable water supplies.

As discussed on pages 5.18-27 to 5.18-28, and as shown in Draft EIR Appendix 5.18-C, the analysis of the project's imported water supplies is based on the most current State Water Project Delivery Capability Report (DCR) prepared by the California Department of Water Resources (DWR), the state agency that owns operates the State Water Project (SWP). As stated in the DCR, since 2003 the DWR has been legally obligated to "prepare and deliver to all SWP contractors, all city and county planning departments, and all regional and metropolitan planning departments within the project service area a report which accurately sets forth, under a range of hydrologic conditions, the then existing overall delivery capability of the project facilities and the allocation of that capacity to each contractor." As discussed in Draft EIR Section 5.18, the project analysis uses the more conservative ELT delivery reliability scenario in the DCR rather than the DCR base scenario, because the ELT scenario incorporates much more significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. The analysis of project imported water supplies is also consistent with and based on the analysis prepared by AVEK in the agency's current Urban Water Management Plan[2613] prepared and adopted in accordance with California Water Code Section 10610 et seq. (the "Urban Water Management Planning Act"). The UWMP was approved by AVEK in 2016 and was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. AVEK is one of 29 SWP contractors in California, is the largest SWP water importer in the Antelope Valley basin and will import all of the SWP system supplies that the Project will use.

In January 2017, at the request of the County, Kennedy-Jenks, a leading California water engineering company, provided a peer review report of the Project's water supply and demand analysis.[2614] The report concluded that the Draft EIR "correctly uses the ELT scenario to estimate future SWP supply availability from AVEK because it is based on existing facilities and regulatory constraints, with hydrology adjusted for the expected effects of climate change." The report also recommended that to be consistent with the AVEK UWMP,

[2613] DRP 2017, Appendix 5.18-F
[2614] *Id.,* Appendix 5.18-G

the Project analysis include a single dry year SWP amount of 5 percent, which was implemented for the Project analysis.[2615]

All Project use of groundwater, imported water return flow production, and water banking will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution.[2616] The Adjudication Judgment and Physical Solution was approved by the California Superior Court in December 2015 to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution represents the best available information about and the legal framework governing the avoidance of potential long-term, cumulative impacts to the Antelope Valley Basin.

The Project water supply analysis is also consistent the analysis methodologies used in the current UWMP adopted by Los Angeles County Waterworks District 40 for portions of the Antelope Valley to the east of the Project site. Although the Project is not within the service area of and will not receive any water from the County Waterworks District 40, the District has the responsibility and expertise for projecting the reliability of Antelope Valley water supplies, and the District's analysis of these supplies uses substantially the same methodology as the Project analysis. The District's UWMP includes: (a) SWP imports based on the AVEK UWMP reliability factors discussed above; (b) groundwater use and imported water return flows allocated to the District under the Adjudication Judgment and Physical Solution; and (c) extensive use of water banking, including dry year recoveries from District water banked in wetter years ranging from 25,300 to 70,525 acre afy in drier years. Based on these supplies, the Los Angeles County Waterworks District 40 UWMP concludes that District has adequate water supplies to meet projected demands in all types of water years, including normal or average, single dry, and multiple dry year droughts.[2617]

Long-term, cumulative regional water supplies are discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single dry and multiple dry years, and taking account of potential climate change impacts, prepared by the California Department of Water Resources in the State Water Project Delivery Capability Report.[2618] As discussed in Draft EIR Sections 5.18 and 7.0, the Antelope Valley Area Plan and General Plan environmental impact reports prepared by Los Angeles County concluded that current water supplies within the Antelope Valley would be sufficient to meet demand up to 2035 during average water years. The environmental impact reports further noted that available water plans and projections, including the 2013 Antelope Valley Integrated Regional Water Management Plan, indicated that current supplies would not sufficient to meet dry and multiple-dry year demand by 2035. The environmental impact reports found that while potential buildout of the Antelope Valley Area Plan and General Plan

[2615] *Id.,* Appendix 5.18-G, p. 18
[2616] *Id.,* Appendix 5.18-D
[2617] DPW 2017, p. ES-3
[2618] DRP 2017, Appendix 5.18-C

in the Antelope Valley region after 2035 could further increase regional water demand, there were no water supply projections extending after 2035. Consequently, the environmental impact reports found that cumulative impacts to regional water supplies would be significant and unavoidable because of the lack of projections for analyzing regional water supply sufficiency after 2035. The Draft EIR determined that the Project would help to reduce the water supply cumulative impact identified in the Antelope Valley Area Plan and General Plan environmental impact reports because it would achieve water use efficiencies above existing average rates in the region and would ensure that the Project-related increment of future regional growth considered in the Antelope Valley Area Plan and General Plan environmental impact reports would occur with a high level of water conservation, including state-of-the art household and irrigation installations and significantly enhanced recycled water use. Nevertheless, consistent with the Antelope Valley Area Plan and General Plan environmental impact reports, the Draft EIR determined that potential cumulative water supply impacts would be significant and unavoidable.

Notably, no party, including the Commenter, challenged the AVAP EIR's water supply analysis within the applicable statute of limitations, and therefore this analysis is now "conclusively presumed to comply" with CEQA.[2619] The Commenter did challenge the County's certification of the AVAP EIR, but did not raise any issue related to the EIR's water supply analysis (Petition for Writ of Mandate, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. BS156932 (L.A. Cty. Sup. Ct. July 16, 2015); Petitioner's Opening Brief, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Statement of Issues, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 (L.A. Cty. Sup. Ct. Oct. 24, 2016); Petitioner's Reply Brief, Ctr. For Biological Diversity v. Cty. of Los Angeles, No. No. BS156932 (L.A. Cty. Sup. Ct. Jan. 18, 2017). In May 2017, the Los Angeles Superior Court rejected all of the claims the Commenter asserted against the AVAP EIR and noted that, apart from certain narrow issues related to Board of Supervisors findings during 2014 and 2015 the lawsuit "concede the adequacy of the [AVAP] FEIR" in all other respects.[2620] The comment provides no evidence suggesting that that the water supply analysis in the AVAP EIR is inaccurate in any manner.

As discussed on Draft EIR page 5.18-67, at buildout, approximately 4,577 afy of recycled water will be used to meet 40 percent of total Project water demand. This level of recycled water use is significantly above the average and per capita recycled water use in the Antelope Valley and furthers the objectives of the State of California in substituting recycled water for potable water throughout the state. As discussed on Draft EIR page 5.18-12, a recycled water use policy was adopted in 2009 by the State Water Resources Control Board (SWRCB) (Resolution No. 2009-0011) and a salt and nutrient management plan (SNMP) was adopted in 2014 in accordance with the policy by the Lahontan Regional Water Quality Control Board. The Project's proposed recycled water use is consistent with the state Recycled Water Policy and the SNMP and results in the significant use of recycled water generated from onsite wastewater reclamation facilities (WRFs) and treated to California Code of Regulations Title 22 unrestricted reuse standards. Consequently, the Draft EIR utilizes the most current and

[2619] CEQA § 21167.2

[2620] Ruling on Submitted Matter, Ctr. For Biol. Diversity v. Cty. of Los Angeles, No. BS156932 (L.A. Cty. Sup. Ct. May 22, 2017), at p. 13

best available information about all of the Project's water supplies and considers all applicable impacts from the proposed use of SWP imports, groundwater, return flows, banked water, and recycled water. The analysis is based on the most current DWR DCR, the current AVEK UWMP, the Antelope Valley Basin Adjudication Judgment and Physical Solution entered by the Court in December 2015, and the state of California and Lahontan Regional Water Quality Control Board recycled water use policies and requirements. The analysis has been peer reviewed by one of the leading California engineering firm and all applicable recommendations in the peer review have been implemented. Cumulative impacts have been evaluated based on applicable plans and policies for the Antelope Valley as well as the AVEK UWMP and the Antelope Valley Basin Adjudication Judgment and Physical Solution.

The Draft EIR includes mandatory and enforceable water conservation, monitoring and adaptive management measures. MM 18-1 requires the following water efficiency and conservation measures, all of which will be incorporated into the Mitigation Monitoring and Reporting Plan (MMRP) for the Project adopted and enforced by the County as required by CEQA:

1. The Project Applicant/Developer must comply with the water efficiency and conservation measures set forth in Divisions 4.3 and 5.3 of the California Green Building Standards (CALGreen) Code or the County Green Building Standards Code, whichever are more stringent.
2. The Project Applicant/Developer must install, maintain, and monitor all non-construction potable and non-potable water use using appropriate metering equipment throughout the site.
3. The Project Applicant/Developer must install, maintain, and operate on-site wastewater treatment and conveyance facilities that provide recycled water treated to California Title 22 unrestricted reuse standards from on-site wastewater and use recycled water to meet (i) 100 percent of commercial, business park, institutional, school, hotel, park, and slope irrigation demand and (ii) outdoor irrigation demand in 50 percent of the total very low and low density residential lot landscaped area.
4. The Project Applicant/Developer must require installation of water-efficient major appliances (washers, dryers, dishwashers) in compliance with the California Appliance Efficiency Regulations, Energy Star, or other applicable standards.
5. The Project Applicant/Developer must require the installation of irrigation equipment with a minimum 0.80 irrigation efficiency for all public and private park, recreation and entertainment land use, arterial roadway, and slope irrigation uses, the use of Water Smart/Evapotranspiration-based controllers, and the use of low water use plants and shrubs in all irrigated slope areas with an average plant factor of 0.2, as defined in the State Model Water Efficient Landscape Ordinance.

6. The Project Applicant/Developer must require that the Project Water Purveyor implement water budget based rates in compliance with all applicable legal requirements and in a manner consistent with the use of such rates by other water districts in California (e.g., Irvine Ranch Water District) to ensure that Project potable water use meets or exceeds the following standards and adjusted as may be required to meet more stringent standards that may be adopted by the State or Los Angeles County: (a) Residential indoor water use – 55 gallons per capita per day; (b) Commercial indoor water use – 200 gallons per day per thousand square feet; (c) Business Park indoor water use – 65 gallons per day per thousand square feet, including recycled water for commercial wastewater and cooling use except where prohibited by applicable law for particular types of areas or uses (e.g., employee cafeterias); (d) Institutional indoor water use – 50 gallons per day per thousand square feet; (e) Hotel indoor water use – 125 gallons per day per room; (f) Residential outdoor water use – 55 percent of the reference evapotranspiration rate for the Project site ; and (g) Commercial, industrial, and institutional outdoor use – 45 percent of the reference evapotranspiration rate for the Project site.

The Project's consistency with the AVAP goals and policies, including the goals and policies referenced in the comment, is discussed in Section 5.8 of the Draft EIR and summarized in Draft EIR Table 5.8-1. AVAP conservation and open space (COS) Goal 1 states that "Growth and development are guided by water supply constraints" and Policy COS 1.1 states that "Require that all new development proposals demonstrate a sufficient and sustainable water supply prior to approval." As discussed above and in Draft EIR Table 5.8-1, the Project is consistent with COS Goal 1 and COS Policy 1.1 because the Project has a sustainable water supply that will meet buildout demand, and maintain an average reserve supply of over 79,000 afy on a sustainable basis after buildout. Consequently, the implementation of the Project is guided by water supply constraints (the Project has a sufficient and sustainable water supply) and, contrary to the comment, the Project has demonstrated a sufficient and sustainable water supply.

AVAP COS Policy 2.1 states "Require new landscaping to comply with applicable water efficiency requirements in the County Code." As discussed on page 5.4-16 of the Draft EIR, in 2008, the County adopted the Green Building Program, which included the Drought-Tolerant Landscaping, Green Building, and Low Impact Development Ordinances (the Ordinances). In November 2013, in response to the mandates set forth in the 2010 CALGreen Code, the Board of Supervisors adopted the Los Angeles County Green Building Standards Code (Title 31). The County Green Building Standards Code requires that post-construction landscape designs comply with all of the following:

1. Turf areas shall not exceed 25 percent of the total landscaped area.
2. Non-invasive, drought-tolerant plant and tree species appropriate for the climate zone region shall be utilized in at least 75 percent of the total landscaped area.
3. Hydrozoning irrigation techniques shall be incorporated into the landscape design.

In addition, a water budget must be developed for landscape irrigation use that conforms to the state Model Water Efficient Landscaping Ordinance (MWELO). As discussed above, MM 18-1 and the MMRP for the Project requires that the water efficiency requirements of the County Code or the County Green Building Standards Code, whichever are more stringent, be implemented by the project and must be confirmed prior to the prior to issuance of applicable construction permits for each Project tentative map. Consequently, the Project is consistent with AVAP Policy COS 2.1 and fully complies with the County Code.

Response to Comment F.8-239:

Please see responses to Comments F.8-170, F.8-229, and F.8-233. There is no merit to the Commenters' argument that the Project site must be designated as a SEA, and the question of whether the Project site should be designated for developed has been definitively resolved on numerous previous occasions.

By contending that the Project is "inconsistent with the previous version of the AVAP," the Commenters are presumably referring to the draft version of the AVAP presented to the Board of Supervisors in November 2014, which was *never adopted*. The County is not required to demonstrate that a project conforms to a general plan feature that was ultimately rejected by the Board of Supervisors and not included in any applicable plan. Moreover, as described in response to Comments F.8-229 and F.8-233, and as explained by the Los Angeles County Superior Court, even the November 2014 draft AVAP "was intended to cause development within the EOAs," and Commenter CBD has explicitly conceded that the AVAP EIR was adequate in its analysis of the November 2014 draft AVAP.[2621]

Response to Comment F.8-240:

Please see response to Comment F.8-227. "Because EIRs are required only to evaluate 'any inconsistencies' with plans, no analysis should be required if the project is consistent with the relevant plans."[2622] Here, there is no requirement to analyze or mitigate any environmental impacts from land use conflicts, because the County has properly determined that the Project is in harmony with the General Plan's goals and policies, when viewed as a whole, and in light of the County's broad discretion to weigh and balance potentially conflicting goals and policies.[2623]

In compliance with applicable County Specific Plan requirements and state law, the Project Specific Plan includes the location of the project's internal circulation network of roadways. As described in the Draft EIR, the only required amendments to the AVAP are straightforward amendments to add the internal Project site roadways to the AVAP Highway Map and the General Plan Highway Plan Policy Map.[2624] These straightforward amendments do not have any potential to cause any significant impact on the physical environment. (See

[2621] AVAP Ruling, at pp. 13 and 16; see also AVAP Transcript at p. 58 ("We haven't attacked the adequacy of the EIR, per se . . .").

[2622] *N. Coast Rivers Alliance*, 216 Cal.App.4th at 632 [quoting C*ity of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 918-919]

[2623] *Ibid.*

[2624] DRP 2017, pp. 5.8-1, -2, -23

Lighthouse Field Beach, 131 Cal.App.4th at 1207 ["[A]n inconsistency between a project and other land use controls does not in itself mandate a finding of significance… [i]t is merely a factor to be considered in determining whether a particular project may cause a significant environmental effect].) Therefore, the EIR properly concludes that there will be no impacts to the physical environmental from land use conflicts.

Response to Comment F.8-241:

Please see response to Comment F.8-227. Irrespective of whether the Project creates any tension with the specific goals and policies cited by the Commenters, "[a]n agency . . . has the discretion to approve a plan even though the plan is not consistent with all of a specific plan's policies",[2625] and are authorized to '"weigh and balance the various policies when considering project compliance."[2626]

Regardless, the Project does not conflict with any applicable goals and policies in the AVAP's Public Safety, Services and Facilities Element. Please see responses to Comments F.8-62 through F.8-64 and F.8-206 through F.8-211. As those responses explain, the Project would neither inadequately protect residents from fire or seismic hazards, violate policies limiting development in active seismic areas (inferred to regard the Alquist-Priolo Earthquake Hazards Act), nor fail to contain proper measures to prevent landslides. The Draft EIR also demonstrates that the Project complied with all applicable goals and policies in the AVAP Public Safety, Services, and Facilities Element.[2627] This comment does not refute of any of these specific findings, but merely connects the Commenters' unsubstantiated assertions regarding inadequate fire and seismic safety to a violation of this element of AVAP. As shown, the Project is consistent with all applicable goals and policies.

Response to Comment F.8-242:

Please see response to Comment F.8-227. "Because EIRs are required only to evaluate 'any inconsistencies' with plans, no analysis should be required if the project is consistent with the relevant plans."[2628] Here, there is no requirement to analyze or mitigate any environmental impacts from land use conflicts, because the County has properly determined that the Project is in harmony with the General Plan's goals and policies, when viewed as a whole, and in light of the County's broad discretion to weigh and balance potentially conflicting goals and policies.[2629]

In compliance with applicable County Specific Plan requirements and state law, the Project Specific Plan includes the location of the project's internal circulation network of roadways. As described in the Draft EIR, the only required amendments to the AVAP are straightforward amendments to add the internal Project site roadways to the AVAP Highway

[2625] *Sierra Club*, 121 Cal. App. 4th at 1511
[2626] *San Francisco Tomorrow*, 228 Cal. App. 4th at 1252
[2627] DRP 2017, pp. 5.8-60 to -67
[2628] *N. Coast Rivers Alliance*, 216 Cal.App.4th at 632 [quoting C*ity of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 918-919]
[2629] *Ibid.*

Map and the General Plan Highway Plan Policy Map.[2630] These straightforward amendments do not have any potential to cause any significant impact on the physical environment. (See *Lighthouse Field Beach*, 131 Cal.App.4th at 1207 ["[A]n inconsistency between a project and other land use controls does not in itself mandate a finding of significance… [i]t is merely a factor to be considered in determining whether a particular project may cause a significant environmental effect].) Therefore, the EIR properly concludes that there will be no impacts to the physical environmental from land use conflicts.

Response to Comment F.8-243:

This comment regarding the administrative record is noted, will be included as part of the record, and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the Proposed Project. The County will continue to implement its document retention and management policies, and if the Draft EIR is certified, the project is approved, and a lawsuit is filed, the petitioner in the lawsuit is required to either elect to prepare the administrative record or to request that the County prepare the record. If petitioner elects to prepare the record, the County is required to review the record for completeness. As noted above, Commenter CBD currently has a lawsuit pending against the County in relation to the EIR for the AVAP, for which the administrative record was prepared as required by law as part of the litigation process. The comment does not address or specifically question the content of the Draft EIR, and no further response is required.

Response to Comment F.8-244:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment expresses an opinion about and does not address or specifically question the content of the Draft EIR, and no further response is required.

Response to Comment F.8-245:

See response to Comment F.8-25A.

Response to Comment F.8-246:

The referenced document was cited in Comment F.8-200 in support of the Commenter's claim that Los Angeles County, Kern County, and San Bernardino County rank among the nation's worst in overall ozone and PM 2.5 pollution. This referenced document is addressed in response to Comment F.8-200. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

[2630] DRP 2017, pp. 5.8-1, -2, -23

Response to Comment F.8-247:

The referenced one-page document is titled *Antelope Valley Regional Conservation Investment Strategy (AV RCIS),* with a footer that reads "Antelope Valley RCIS, Public Meeting, March 7, 2017." The document consists of (i) a Stakeholders for the AV RCIS," which list includes the name of commenter CBD. The Commenter's submittal of this document, and the document itself, are noted, included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. This document was also cited in Comment F.8-172 and hyperlinked at Comment F.8-172B, and is therefore substantively addressed in responses to Comments F.8-172 and F.8-172B.

Response to Comment F.8-248:

This is an incomplete citation. It appears to be a citation to the same document listed in Comment F.8-289, which is responded to in response to Comment F.8-289. In the event this is not the same document cited in Comment F.8-289, the Lead Agency notes that not enough information has been provided to allow identification of the document after diligent search, and it therefore cannot be addressed in this Final EIR.

Response to Comment F.8-249:

The referenced document was cited in Comment F.8-190 to support the claim that Southern California has an abundance of diesel shipping traffic. This reference document is addressed in response to Comment F.8-190. This document is noted and will be included in the administrative record and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-250:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *Marking of deer fences to reduce frequency of collisions by woodland grouse*, are acknowledged.

Response to Comment F.8-251:

The Draft EIR incorporates the analysis of potential climate change impacts to hydrology used in the Early Long Term (ELT) scenario developed by the California Department of Water Resources in Appendix C of the State Water Project Delivery Capability Report (DCR).[2631] The climate change methodologies used in the ELT scenario are described in Appendix 5.A.2, Climate Change Approach and Implications for Aquatic Species, of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2632] Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and

[2631] DRP 2017, Appendix 5.18-D
[2632] BDCP 2014

analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Section and World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2633] BDCP Appendix 5.A.2 provides more current and California-specific information regarding hydrology and climate change than the cited source, which in any event primarily addresses energy use for water supplies in the southwestern United States.

Response to Comment F.8-252:

The referenced document was cited in Comment F.8-188 in support of the Commenter's claim that "poor air quality that contributed to climate change will in turn worsen the impacts of climate and attendant air pollution problems." This referenced document is addressed in response to Comment F.8-188. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-253:

The referenced document was cited in Comment F.8-204 as a source of mitigation measures to be considered in the EIR. This reference document is addressed in response to Comment F.8-204. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-254:

Note that the reference is tied to Comment F.8-152; please see response to Comment F.8-152. The comment and the referenced document, *Status of the Ringtail in California,* are acknowledged.

Response to Comment F.8-255:

The referenced document was cited in Comment F.8-190 to support the claim that Southern California has an abundance of diesel shipping traffic. This reference document is addressed in response to Comment F.8-190. This document is noted and will be included in the administrative record and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

[2633] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

Response to Comment F.8-256:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *Influence of roads on the endangered Stephens' kangaroo rat (*Dipodomys stephensi*): are dirt and gravel roads different,* are acknowledged.

Response to Comment F.8-257:

Note that the reference is tied to Comment F.8-107; please see response to Comment F.8-107. The comment and the referenced document, *Effects of Invasive Alien Plants on Fire Regimes,* are acknowledged.

Response to Comment F.8-258:

Note that the reference is the same as Comment F.8-147B, which is a footnote related to Comment F.8-147; please see responses to Comments F.8-147 and F.8-147B. The comment and the referenced document, *Nonbreeding bald eagle communal and solitary roosting behavior and roost habitat on the northern Chesapeake Bay,* are acknowledged.

Response to Comment F.8-259:

The referenced document was cited in Comment F.8-204 as a source of mitigation measures to be considered in the Draft EIR. This reference document is addressed in response to Comment F.8-204. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-260:

The referenced document was cited in Comment F.8-204 as a source of mitigation measures to be considered in the Draft EIR. This reference document is addressed in response to Comment F.8-204. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-261:

The referenced document was cited in Comment F.8-204 as a source of mitigation measures to be considered in the Draft EIR. This reference document is addressed in response to Comment F.8-204. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-262:

The California Environmental Quality Act (CEQA) does not require a response to a general reference without a specific point as to why it is included. The reference is acknowledged as being included in the comment letter. The reference will be included as part of the record

and will be provided to the Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-263:

Note that the reference is the same as Comment F.8-152A, which is a footnote related to Comment F.8-152; please see responses to Comments F.8-152 and F.8-152A. The comment and the referenced document, *California Wildlife Habitat Relationships System: Ringtail Bassariscus astutus,* are acknowledged.

Response to Comment F.8-264:

Note that the reference is the same as Comment F.8-137A, which is a footnote related to Comment F.8-137; please see responses to Comments F.8-137 and F.8-137A. The comment and the referenced document, *Fully Protected Animals,* are acknowledged.

Response to Comment F.8-265:

Note that the reference is the same as Comment F.8-87A, which is a footnote related to Comment F.8-87; please see responses to Comments F.8-87 and F.8-87A. The comment and the referenced document, *Newhall Ranch Resource and Development Management and Development Plan, Final Additional Environmental Analysis, Appendix 2.1,* are acknowledged.

Response to Comment F.8-266:

The California Environmental Quality Act (CEQA) does not require a response to a general reference without a specific point as to why it is included. The reference is acknowledged as being included in the comment letter. The reference will be included as part of the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-267:

The referenced document was cited in Comment F.8-80 in support of the Commenter's claim that, without implementation of energy efficiency, the State's peak electricity demand is projected to grow by 1.14 percent between 2010 and 2020. This referenced document is addressed in response to Comment F.8-80. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-268:

This reference was cited to support a specific statement in Comment F.8-206, and is therefore acknowledged here, but addressed in response to Comment F.8-206. As noted in response to Comment F.8-206, the USGS map cited in Comment F.8-206 is meant to be used

as a broad (i.e., Statewide), general (i.e., unquantified) indication of potential shaking potential over different portions of the state. The 2003 map cited in the comment has been superseded by a 2016 version.[2634] As stated on this map, "The resulting earthquake shaking potential is used in developing building code design values, estimating future earthquake losses, and prioritizing earthquake retrofit." Calculations of earthquake shaking hazard for California are part of a cooperative project between USGS and California Geological Survey (CGS) and are part of the National Seismic Hazard Maps. On the National Seismic Hazard Maps website, the difference between geologic hazard and geologic risk is discussed. As stated on this website, "Bottom line: High earthquake hazard does not mean high risk. Also, while you can't change the underlying earthquake hazard, you can reduce earthquake risk by managing the built environment".[2635] This is consistent with, and supports, the following statement on Draft EIR page 5.1-15: "Compliance with geotechnical recommendations, which reflect building code requirements, would result in the construction of earthquake-resistant structures. However, in the event of a major seismic event, no structure is completely safe from damage. Incorporation of these measures reduces the potential risk from seismic and geotechnical conditions to the maximum extent practicable under current engineering practice." Additionally, the National Seismic Hazard Maps website states "there are versions of the maps designed specifically for the public, to help people learn more about the hazard from earthquake ground shaking in their area".[2636] An example of such a map is then presented, and is the Frequency of Damaging Earthquake Shaking Around the U.S..[2637] As shown on this map, the risk for earthquake shaking throughout Southern California is essentially the same, with a reduced risk along the southeastern portion of the State. This is consistent with, and supports, the following statement on Draft EIR page 5.1-15: "It should be emphasized that, while the Project site has identified geotechnical constraints, the overall seismic risk at the Project site is the same as Southern California in its entirety."

Response to Comment F.8-269:

See response to Comment F.8-27A.

Response to Comment F.8-270:

The referenced document was cited in Comment F.8-81 in support of the Commenter's claim that the CPUC has committed to the goal of zero net energy for all new residential construction. This referenced document is addressed in response to Comment F.8-81. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-271:

Note that the reference is the same as Comment F.8-112A, which is a footnote related to Comment F.8-112; please see responses to Comments F.8-112 and F.8-112A. The comment and the referenced document, *Use of Ecoregions, Hydrologic Unit Codes, and Marine*

[2634] Available at: ftp://ftp.conservation.ca.gov/pub/dmg/pubs/ms/048/MS_048_revised_2016.pdf.
[2635] USGS 2017
[2636] *Ibid*.
[2637] Available at: https://earthquake.usgs.gov/hazards/learn/images/2014hazmap-induced-lg.gif.

Protection Study Regions as the Planning Units for the State Wildlife Action Plan Update, are acknowledged.

Response to Comment F.8-272:

The referenced document was cited in Comment F.8-79 to support the claim that the development of utility-scale renewable energy facilities has the potential to adversely affect biological resources. This reference document is addressed in response to Comment F.8-79. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-273:

Note that the reference is the same as Comment F.8-145B, which is a footnote related to Comment F.8-145; please see responses to Comments F.8-145 and F.8-145B. The comment and the referenced document, *Viewsheds: a complementary management approach to buffer zones,* are acknowledged.

Response to Comment F.8-274:

Although this document is included on the list of references that follows the Commenter's full comment letter, it is not cited in the body of the comment letter itself, and the Commenter did not provide any explanation as to the intended use of the referenced document. The referenced document is titled *Scenarios of Climate Change in California: An Overview* and is dated February 2006. CEQA does not require a response to general reference documents submitted in support of comments.[2638] The Commenter's submittal of this document, and the document itself, are noted, included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. It is noted that a 2007 version of a similar document is also included on the reference list that follows the Commenter's full comment letter, as discussed in response to Comment F.8-223. It is further noted that the Project's potential significant impacts related to climate change are analyzed in Section 5.21, Climate Change.

Response to Comment F.8-275:

Note that the reference is tied to Comment F.8-107; please see response to Comment F.8-107. The comment and the referenced document, *Spatial patterns of agricultural expansion determine impacts on biodiversity and carbon storage,* are acknowledged.

Response to Comment F.8-276:

Note that the reference is the same as Comment F.8-140A, which is a footnote related to Comment F.8-140; please see responses to Comments F.8-140 and F.8-140A. The comment and the referenced document, *California Condor Activity in the Tejon Ranch Region,* are acknowledged.

[2638] *Environmental Protection Info. V. Department of Forestry and Fire Protection* (2008) 44 Cal. 4th 459, 483, 487

Response to Comment F.8-277:

The referenced document was cited in Comment F.8-84 to support the Commenter's characterization of "green buildings." This reference document is addressed in response to Comment F.8-84. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-278:

Note that the reference is the same as Comment F.8-112A, which is a footnote related to Comment F.8-112; please see responses to Comments F.8-112 and F.8-112A. The comment and the referenced document, *Proposed Reserve Design for Tejon Ranch - A Threatened California Legacy,* are acknowledged.

Response to Comment F.8-279:

Note that the reference is the same as Comment F.8-147A, which is a footnote related to Comment F.8-147; please see responses to Comments F.8-147 and F.8-147A. The comment and the referenced document, *Recommended buffer zones and seasonal restrictions for Colorado raptors,* are acknowledged. Please note that this reference was not included on the CD which accompanied the comment letter. A literature review was conducted and was unable to locate the reference as listed. However, a 2008 paper with the same title and a line of text which indicates the author listed, G.R. Craig, originally developed the guidelines in 2002 and that the 2008 revision is the current version. Therefore, the 2008 version was reviewed in preparation of responses to Comments F.8-147 and F.8-147A.

Response to Comment F.8-280:

Note that the reference is tied to Comment F.8-107; please see response to Comment F.8-107. The comment and the referenced document, *Hopes for the Future: Restoration Ecology and Conservation Biology,* are acknowledged.

Response to Comment F.8-281:

Note that the reference is the same as Comment F.8-161A, which is a footnote related to Comment F.8-161; please see responses to Comments F.8-161 and F.8-161A. The comment and the referenced document, *Relocation, repatriation and trans location of amphibians and reptiles: are they conservation strategies that work?,* are acknowledged.

Response to Comment F.8-282:

The referenced document was cited in Comment F.8-81 in support of the Commenter's claim that distributed solar is a good example of appropriately sited renewable energy. This referenced document is addressed in response to Comment F.8-81. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-283:

The referenced document was cited in Comment F.8-188 in support of the Commenter's claim that that greenhouse gas emissions contribute to human-induced climate change. This referenced document is addressed in response to Comment F.8-188. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-284:

The referenced document was cited in Comment F.8-188 in support of the Commenter's claim that air pollution adversely impacts aquatic species in the form of acid rain. This referenced document is addressed in response to Comment F.8-188. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-285:

The referenced document was cited in Comment F.8-225 to support the Commenter's claim that shifting weather patterns are having an adverse effect on water quality and quantity in many countries where groundwater sources are overdrawn. The referenced document is a 2005 report published by Harvard Medical School Center for Health and the Global Environment titled Climate Change Futures. The referenced document evaluates the potential effects of climate change on human health that may occur under two different "business as usual" climate change scenarios, including potential climate change effects related to water supply and quality in various regions of the world, including Central Europe, South America, Africa. The potential effects of climate change on Project water supplies are addressed in response to Comment F.8-225. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-286:

Note that the reference is the same as Comment F.8-129A, which is a footnote related to Comment F.8-129; please see responses to Comments F.8-129 and F.8-129A. The comment and the referenced document, *Mitigation Related Transplantation, Relocation, and Reintroduction Projects Involving Endangered and Threatened and Rare Plant Species in California, Final Submitted to the California Department of Fish and Game-Endangered Plant Program,* are acknowledged.

Response to Comment F.8-287:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *Roads as conduits for exotic plant invasions in a semiarid landscape,* are acknowledged.

Response to Comment F.8-288:

The referenced document was cited in Comment F.8-191 in support of the Commenter's claim that the Draft EIR should include a life cycle assessment of the entire Project. This referenced document is addressed in response to Comment F.8-191. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-289:

The Draft EIR incorporates the analysis of potential climate change impacts to hydrology used in the Early Long Term (ELT) scenario developed by the California Department of Water Resources in Appendix C of the State Water Project Delivery Capability Report (DCR).[2639] The climate change methodologies used in the ELT scenario are described in Appendix 5.A.2, Climate Change Approach and Implications for Aquatic Species, of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2640] Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Section and World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2641] BDCP Appendix 5.A.2 provides more current and California-specific information regarding hydrology and climate change than the cited source.

Response to Comment F.8-290:

Note that the reference is the same as Comment F.8-159A, which is a footnote related to Comment F.8-159; please see responses to Comments F.8-159 and F.8-159A. The comment and the referenced document, *Spacing and ecology of north American badgers (*Taxidea taxus*) in a prairie-dog (*Cynomys leucurus*) complex,* are acknowledged.

Response to Comment F.8-291:

This reference was cited to support a specific statement in Comment F.8-211, and is therefore acknowledged here, but addressed more directly in Comment F.8-211. Documentation regarding the landslides triggered by the 1994 Northridge earthquake, situated approximately 50 miles to the south and in a different geotechnical context, bears no relation to the risk of seismically-induced landslides on the Project site. This document

[2639] DRP 2017, Appendix 5.18-D

[2640] BDCP 2014

[2641] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

does not represent expert opinion or other facts that supplant the findings of the site-specific geotechnical studies.

Response to Comment F.8-292:

The referenced document was cited in Comment F.8-80 in support of the Commenter's claim that electricity generated from fossil fuels contributed to air pollution from carbon dioxide and fine particulate matter, and water pollution from direct spills or impacts to groundwater from drilling, mining, and injection activities. This referenced document is addressed in response to Comment F.8-80. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-293:

The referenced document was cited in Comment F.8-81 in support of the Commenter's claim that energy efficiency measures reduces energy consumption and thus has beneficial impacts. This referenced document is addressed in response to Comment F.8-81. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-294:

Although this document is included on the list of references that follows the Commenter's full comment letter, it is not cited in the body of the comment letter itself, and the Commenter did not provide any explanation as to the intended use of the referenced document. The referenced document is a single chapter of a larger volume titled *Climate Change 2007: Working Group I: The Physical Science Basis*, and is itself subtitled *Chapter 3: Observations: Surface and Atmospheric Climate Change*. CEQA does not require a response to general reference documents submitted in support of comments.[2642] The Commenter did not provide a copy of the referenced document to the lead agency. The Commenter's submittal of this document, and the document itself, are noted, included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. It is noted that the Project's potential significant impacts related to climate change are analyzed in Section 5.21, *Climate Change*.

Response to Comment F.8-295:

Note that the reference is the same as Comment F.8-165A, which is a footnote related to Comment F.8-165; please see responses to Comments F.8-165 and F.8-165A. The comment and the referenced document, *A literature review and analysis of pronghorn populations at Tejon Ranch, California,* are acknowledged.

[2642] *Ibid.*

Response to Comment F.8-296:

The Draft EIR incorporates the analysis of potential climate change impacts to hydrology used in the Early Long Term (ELT) scenario developed by the California Department of Water Resources in Appendix C of the State Water Project Delivery Capability Report (DCR).[2643] The climate change methodologies used in the ELT scenario are described in Appendix 5.A.2, Climate Change Approach and Implications for Aquatic Species, of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2644] Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Section and World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2645] BDCP Appendix 5.A.2 provides more current and California-specific information regarding hydrology and climate change than the cited source, which in any event primarily addresses energy use for water supplies in the southwestern United States.

Response to Comment F.8-297:

The referenced document was cited in Comment F.8-190 to support the Commenter's claim that certain air pollutants, including PM, have been linked to adverse health effects, including birth defects. The referenced document is addressed in response to Comment F.8-190. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-298:

Note that the reference is tied to Comment F.8-109; please see response to Comment F.8-109. The comment and the referenced document, *Silent Spring Revisited: Pesticide Use and Endangered Species*, are acknowledged.

Response to Comment F.8-299:

Note that the reference is the same as Comment F.8-159A, which is a footnote related to Comment F.8-159; please see responses to Comments F.8-159 and F.8-159A. The comment and the referenced document, *Taxidea taxus,* are acknowledged.

2643 DRP 2017, Appendix 5.18-D

2644 Bay Delta Conservation Plan (BDCP). 2014. 2013 Public Review Draft BDCP. http://baydeltaconservationplan.com/EnvironmentalReview/EnvironmentalReview/2013-2014PublicReview/2013PublicReviewDraftBDCP.aspx.

2645 *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

Response to Comment F.8-300:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *Ecological Light Pollution,* are acknowledged.

Response to Comment F.8-301:

Note that the reference is the same as Comment F.8-180A, which is a footnote related to Comment F.8-180; please see responses to Comments F.8-180 and F.8-180A. The comment and the referenced document, *On the perils of ecological restoration: Lessons from the El Segundo blue butterfly,* are acknowledged.

Response to Comment F.8-302:

The referenced document is the Antelope Valley Area Plan, adopted in June 2015. This document is discussed throughout the Draft EIR and will be included in the administrative record. This document is also cited in Comment F.8-7 and is therefore also discussed in detail in that response.

Response to Comment F.8-303:

The referenced document is the Los Angeles County General Plan. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-304:

The referenced document was cited in Comment F.8-81 in support of the Commenter's claim that legislation is needed to promote the appropriate siting and use of renewable energy, such as CALGreen and its requirement that new construction incorporate solar-ready roofs and solar –ready pre-wiring. This referenced document is addressed in response to Comment F.8-81. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-305:

Note that the reference is tied to Comment F.8-79; please see response to Comment F.8-79. The comment and the referenced document, *Wildlife Conservation and Solar Energy Development in the Desert Southwest,* are acknowledged.

Response to Comment F.8-306:

The referenced document was cited in Comment F.8-81 in support of the Commenter's claim that shifting from non-renewable fossil fuels to renewable energy sources will reduce GHG emissions, air, water and pollution impacts to biological resources, provided renewable energy facilities are properly sited. This referenced document is addressed in response to

Comment F.8-81. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-307:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *Poisoning Our Imperiled Wildlife,* are acknowledged.

Response to Comment F.8-308:

Note that the reference is tied to Comment F.8-107; please see response to Comment F.8-107. The comment and the referenced document, *Historical declined of coastal sage scrub in the Riverside-Perris Plain,* are acknowledged.

Response to Comment F.8-309:

Note that the reference is the same as Comment F.8-116A, which is a footnote related to Comment F.8-116; please see responses to Comments F.8-116 and F.8-116A. The comment and the referenced document, *How much compensation is enough? A framework for incorporating uncertainty and time discounting when calculating offset ratios for impacted habitat,* are acknowledged.

Response to Comment F.8-310:

The referenced document was cited in Comment F.8-189 to support the Commenter's observation that transportation presents one of the most significant sources of pollution in urban areas. The Commenter is correct, as is discussed in response to Comment F.8-189. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-311:

Note that the reference is tied to Comment F.8-107; please see response to Comment F.8-107. The comment and the referenced document, *Alterations of Riparian Ecosystems Caused by River Regulation: Dam operations have caused global-scale ecological changes in riparian ecosystems,* are acknowledged.

Response to Comment F.8-312:

See response to Comment F.8-28A.

Response to Comment F.8-313:

See response to Comment F.8-17A.

Response to Comment F.8-314:

Note that the reference is the same as Comment F.8-116A, which is a footnote related to Comment F.8-116; please see responses to Comments F.8-116 and F.8-116A. The comment and the referenced document, *Biodiversity offsets: two New Zealand case studies and an assessment framework,* are acknowledged.

Response to Comment F.8-315:

The Draft EIR incorporates the analysis of potential climate change impacts to hydrology used in the Early Long Term (ELT) scenario developed by the California Department of Water Resources in Appendix C of the State Water Project Delivery Capability Report (DCR).[2646] The climate change methodologies used in the ELT scenario are described in Appendix 5.A.2, Climate Change Approach and Implications for Aquatic Species, of the public review documents prepared and published for the proposed Bay Delta Conservation Plan (BDCP).[2647] Among other reference sources, BDCP Appendix 5.A.2 considers multiple water supply planning and climate change studies and publications, including studies and publications by the California Climate Action Team, updates to the California Water Plan, and analyses prepared with the participation of the U.S. National Marine Fisheries Service, California Climate Action Registry, the Coupled Model Intercomparison Project Phase 3 (SIMP3), the U.S. Bureau of Reclamation, the California Department of Fish and Wildlife, the Suisun Resource Conservation District, the U.S. Fish and Wildlife Section and World Climate Research Program and the Intergovernmental Panel on Climate Change (IPCC).[2648] BDCP Appendix 5.A.2 provides more current and California-specific information regarding hydrology and climate change than the cited source.

Response to Comment F.8-316:

The referenced document was cited in Comment F.8-204 as a source of mitigation measures to be considered in the Draft EIR. This reference document is addressed in response to Comment F.8-204. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-317:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *Landowner's Guide to Wildlife Friendly Fences,* are acknowledged.

[2646] DRP 2017, Appendix 5.18-D

[2647] BDCP 2014

[2648] *Id.,* BDCP Appendix 5.A.2, Table 5.A.2.2-1, Summary of Recent State and Federal Approaches for Incorporating Climate Change in California Water Planning, and the references cited pp. 5.A.2.0-4 and 5.A.2-108 to 5.A.2-112.

Response to Comment F.8-318:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *Effects of the Herbicide Roundup on Freshwater Microbial Communities: A Mesocosm Study,* are acknowledged.

Response to Comment F.8-319:

The referenced document was cited in Comment F.8-81 in support of the Commenter's claim that zero net energy buildings produce enough renewable energy to meet the building's annual energy needs. This referenced document is addressed in response to Comment F.8-81. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-320:

This reference document was cited in Comment F.8-108 to support a statement that roads create habitat fragmentation. As such, the assertion is addressed in response to Comment F.8-108. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-321:

The article referenced in this footnote discusses the California Energy Commission's denial of a 100-megawatt natural gas–fired gas turbine power plant in part because rooftop solar photovoltaic (PV) could potentially achieve the same objectives for comparable cost. The author argues several points: that urban PV is a cost-effective alternative to peaking gas-fired power, could provide reliable power in many places nationwide, could fulfill 75 percent of California's renewables target, and could minimize new transmission line buildout. The net effect of these points is to place more focus on urban PV to carry a much bigger share of the nation's renewable energy load than had been previously contemplated by policymakers.

The Specific Plan's Green Development Program requires the installation of on-site solar panel systems on roof areas for a minimum of 30 percent of all single-family detached and attached residential units; a minimum of 30 percent of all multi-family residential units, and a minimum of 60 percent of buildings located within Business Park land use designations. It should be noted that the Project does not propose to install rooftop solar on 100 percent of single-family detached homes. It is noted that Draft EIR Table 5.21-11 inaccurately states that a minimum of 100 percent of all single-family detached residential units will be constructed with solar energy collection equipment. This statement is a typographical error. As explained in response to Comment F.3A-71, MM 21-2 requires the Project Applicant/Developer to provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature, and the CALGreen Code requires that all residential houses be constructed with "solar ready" roofs that can accommodate solar collection systems. In addition, MM 21-5 requires the Project to equip a minimum of 70

percent of public and community pools and spas with active solar water heating systems where heating is necessary or desired, and MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. Similarly, MM 21-2 requires the Project to comply with CALGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent.

Response to Comment F.8-322:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *The Lethal Impacts of Roundup on Aquatic and Terrestrial Amphibians, Ecological Applications,* are acknowledged.

Response to Comment F.8-323:

Note that the reference is the same as Comment F.8-145A, which is a footnote related to Comment F.8-145; please see responses to Comments F.8-145 and F.8-145A. The comment and the referenced document, *Recommendations for protecting raptors from human disturbance: a review,* are acknowledged.

Response to Comment F.8-324:

The referenced document was cited in Comment F.8-204 as a source of mitigation measures to be considered in the EIR. This reference document is addressed in response to Comment F.8-204. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-325:

The referenced document was cited in Comment F.8-204 as a source of mitigation measures to be considered in the EIR. This reference document is addressed in response to Comment F.8-204. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-326:

The referenced document was cited in Comment F.8-204 as a source of mitigation measures to be considered in the EIR. This reference document is addressed in response to Comment F.8-204. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-327:

The article referenced in this footnote describes the full range and scale of climate change effects on global biodiversity that have been observed in natural systems. The researchers identified a set of core ecological processes that underpin ecosystem functioning and support services to people. Of the 94 processes considered, 82 percent showed evidence of impact from climate change in the peer-reviewed literature. Examples of observed impacts from meta-analyses and case studies go beyond well-established shifts in species ranges and changes to phenology and population dynamics to include disruptions that scale from the gene to the ecosystem. Understanding shifts in ecological processes can guide human adaptation strategies. In addition to reducing greenhouse gases, the article posits that climate action and policy must therefore focus equally on strategies that safeguard biodiversity and ecosystems. The referenced document is noted for the record. As discussed in responses to Comments F.8-175 through F.8-178, climate change is acknowledged as an existing condition that has influenced the current biological setting of the Project site, and this existing physical setting is the "baseline" from which Project impacts are assessed in Section 5.7, Biological Resources, in the Draft EIR. Further, as discussed in response to Comment F.8-20, the Project is sited in a location projected for future development by, and is consistent with, the regional Sustainable Communities Strategy adopted pursuant to Senate Bill 375, the state's premiere strategy for addressing greenhouse gas emissions related to the land use sector.

Response to Comment F.8-328:

This document was cited in Comment F.8-225 to support a specific statement. However, this document was not provided on the Commenter's reference CD, and it could not be located after a diligent online search using the title and author information provided by the Commenter as search terms. Therefore, it cannot be addressed in this Final EIR. However, please see response to Comment F.8-225 for a response regarding the Commenter's assertions in that comment.

Response to Comment F.8-329:

Note that the reference is tied to Comment F.8-109; please see response to Comment F.8-109. The comment and the referenced document, *Measuring the Success of Wildlife Linkage Efforts,* are acknowledged.

Response to Comment F.8-330:

The California Environmental Quality Act (CEQA) does not require a response to a general reference without a specific point as to why it is included. The reference is acknowledged as being included in the comment letter. The reference will be included as part of the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-331:

The referenced document is a summary of geology in the Imperial Valley. It is acknowledged and will be provided to the Regional Planning Commission and Board of Supervisors as part of the record. The referenced hyperlink is no longer in service, but this document was provided on the Commenter's CD. It was cited to support a statement in Comment F.8-112 and the citation is provided in a footnote at Comment F.8-112B. It is, therefore, addressed in response to Comment F.8-112B.

Response to Comment F.8-332:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *Birdsong and anthropogenic noise: implications and applications for conservation,* are acknowledged.

Response to Comment F.8-333:

Note that the reference is tied to Comment F.8-109; please see response to Comment F.8-109. The comment and the referenced document, *South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion,* are acknowledged.

Response to Comment F.8-334:

Note that the reference is the same as Comment F.8-147A, which is a footnote related to Comment F.8-147; please see responses to Comments F.8-147 and F.8-147A. The comment and the referenced document, *Behavioral Responses of Wintering Bald Eagles to Human Activity,* are acknowledged.

Response to Comment F.8-335:

Note that the reference is tied to Comment F.8-79; please see response to Comment F.8-79. The comment and the referenced document, *An Ill Wind,* are acknowledged.

Response to Comment F.8-336:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *Road crossing in Sigmodon Hispidus and Microtus Ochrogaster,* are acknowledged.

Response to Comment F.8-337:

The referenced document was cited in Comment F.8-80 in support of the Commenter's claim that water and energy utilities should work together to design more efficient systems in order to reduce adverse impacts on water and air resources. This reference document is addressed in response to Comment F.8-80. This document is noted, will be included in the administrative record, and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

Response to Comment F.8-338:

The California Environmental Quality Act (CEQA) does not require a response to a general reference without a specific point as to why it is included. The reference is acknowledged as being included in the comment letter. The reference will be included as part of the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-339:

The California Environmental Quality Act (CEQA) does not require a response to a general reference without a specific point as to why it is included. The reference is acknowledged as being included in the comment letter. The reference will be included as part of the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-340:

The California Environmental Quality Act (CEQA) does not require a response to a general reference without a specific point as to why it is included. The reference is acknowledged as being included in the comment letter. The reference will be included as part of the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response to Comment F.8-341:

Note that the reference is the same as Comment F.8-150A, which is a footnote related to Comment F.8-150; please see responses to Comments F.8-150 and F.8-150A. The comment and the referenced document, *The Status of Swainson's Hawk Breeding in the Antelope Valley of California,* are acknowledged.

Response to Comment F.8-342:

This reference document, *U.S. Census QuickFacts*, (U. S. Census Bureau, 2016) was cited and provided as part of the comment letter. It provides statistics for the entire United States and shows the percent of the country's total population in the civilian labor force (persons age 16 years or more) was 63.3 percent from 2011 to 2015. This information was used to estimate the number of residents of the Project that would be part of the civilian labor force (36,176 persons) in Comment F.8-197. As indicated in the response to Comment F.8-197, which addresses the referenced document, the estimated 23,675 jobs at the Project would include both skilled and non-skilled workers that could be filled by residents of the Project. Residents are also expected to be travelling to off-site areas for employment, which is accounted for in the Traffic Study for the Project.

Response to Comment F.8-343:

Note that the reference is the same as Comment F.8-144A, which is a footnote related to Comment F.8-144; please see responses to Comments F.8-144 and F.8-144A. The comment and the referenced document, *Bald and Golden Eagles: Population demographics and estimation of sustainable take in the United States,* are acknowledged.

Response to Comment F.8-344:

Note that the reference is the same as Comment F.8-138A, which is a footnote related to Comment F.8-138; please see responses to Comments F.8-138 and F.8-138A. The comment and the referenced document, *California Condor Recovery Program 2015 Annual Condor Population Status Update,* are acknowledged.

Response to Comment F.8-345:

Note that the reference is the same as Comment F.8-145C, which is a footnote related to Comment F.8-145; please see responses to Comments F.8-145 and F.8-145C. The comment and the referenced document, *Resident Golden Eagle Ranging Behaviour Before and After Construction of a Windfarm in Argyll,* are acknowledged.

Response to Comment F.8-346:

Note that the reference is tied to Comment F.8-107; please see response to Comment F.8-107. The comment and the referenced document, *A preliminary assessment of avian mortality at utility-scale solar energy facilities in the United States,* are acknowledged.

Response to Comment F.8-347:

Note that the reference is tied to Comment F.8-108; please see response to Comment F.8-108. The comment and the referenced document, *A phantom road experiment reveals traffic noise is an invisible source of habitat degradation,* are acknowledged.

Response to Comment F.8-348:

The article referenced in this footnote is intended to be a guide for local government officials, planners, and citizens concerned about how development within existing towns and cities—especially infill housing and mixed-use development—can help revitalize communities and accommodate the future growth of the Bay Area.

The author argues that given the region's housing crisis, residential or mixed-use infill is important to create additional housing near jobs in many existing Bay Area communities. Infill development, however, faces many obstacles in the Bay area, including but not limited to land availability, outdated zoning requirements, and lengthy permitting processes. Local governments can tackle these obstacles by creating specific plans that revise zoning codes, adopt design guidelines, and streamline permitting processes, amongst other actions. Bay Area communities, such as San Jose, San Rafael, San Francisco, Emeryville, and Oakland have

already created a favorable context for infill by creating specific plans. State and regional policy, plus citizen action and nongovernmental organizations, can build political support for infill and help Bay Area cities and towns become more livable and sustainable through infill development.

As discussed in response to Comment F.8-7, the County adopted the AVAP in 2015 as a component of its General Plan in order to establish a comprehensive land use plan for accommodating projected growth in the planning area, as required by Government Code §65583. Indeed, the AVAP expressly states that it was prepared "[i]n anticipation of future growth" and is thus "focused on ways to manage this growth".[2649] As shown in Draft EIR Table 5.9-5, significant population growth is anticipated in TAZ 20280000, which covers the portion of the Project site north of SR-138. Specifically, SCAG projects that TAZ 20280000 will grow from 372 people in 2008 to 50,505 people by 2040, as shown in Draft EIR Table 5.9-5.

As discussed in response to Comment F.7-1, the planning policies and environmental benefits of the Rural Preservation Strategy are closely aligned with the regional land use policies described in the 2016-2040 Regional Transportation Plan/Sustainable Communities Plan (2016 RTP/SCS) prepared by the Southern California Association of Governments (SCAG). Specifically, the Project is consistent with, and implements, regional and County plans to strategically locate future growth in a manner that both achieves statewide GHG reduction goals and relieves the potential adverse and social effects of focusing too much future growth in both agricultural areas and in infill, transit-oriented areas. It is AVAP's stated intent to establish a land use plan that will accommodate projected growth while also preserving the rural character of Antelope Valley.

Response to Comment F.8-349:

Note that the reference is the same as Comment F.8-163A, which is a footnote related to Comment F.8-163; please see responses to Comments F.8-163 and F.8-163A. The comment and the referenced document, *Distribution and abundance of western burrowing owls (*Athene cunicularia hypugaea*) in southeastern California,* are acknowledged.

Response to Comment F.8-350:

This introductory comment does not raise any specific concerns regarding the Project's potential environmental effects or the adequacy of the Draft EIR. Therefore, no further response is required. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment F.8-351:

This introductory comment does not raise any specific concerns regarding the Project's potential environmental effects or the adequacy of the Draft EIR. Therefore, no further

[2649] DRP 2015, pp. I-6

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

Response to Comment F.8-352:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment does not specifically address or question the content of the Draft EIR, and no further response is required.

Response to Comment F.8-353:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment does not specifically address or question the content of the Draft EIR, and no further response is required.

Response to Comment F.8-354:

The Los Angeles County's Traffic Impact Analysis Report Guidelines (County of Los Angeles Department of Public Works, January 1997) state that counts should not be over one year old. The County also applies discretion based on the specifics of the study. The Project Traffic Study (Draft EIR Appendix 5.10-A) work effort was initiated in February 2015 and the traffic counts used in the traffic analysis were obtained at various times, generally between March 2014 and July 2015. As shown in Draft EIR Table 5.10-3 ICU and LOS Summary – Existing (2014 and 2015) Conditions, page 5.10-21, traffic volume data for intersections in the Santa Clarita Valley area were obtained in March 2014 and the traffic volume data for intersections along the SR-138 and in Kern County were obtained in July 2015. The dates of the traffic counts used for the impact analysis are in accordance with the guidelines of each applicable jurisdiction, as also discussed in further detail in responses to Comments F.8-355 through F.8-363.

Response to Comment F.8-355:

The Los Angeles County's Traffic Impact Analysis Report Guidelines (County of Los Angeles Department of Public Works, January 1997) and the County traffic scoping instructions (County of Los Angeles Department of Public Works, Traffic and Lighting Division, March 2014) state that counts should not be over one year old. The County also applies discretion based on the specifics of the study. The Project Traffic Study[2650] work effort was initiated in February 2015. Therefore, the oldest counts should not be older than February 2014 according to policy. The oldest counts used in the traffic study are from March 2014 (for intersections in the Santa Clarita Valley area), and the remainder were collected in January 2015 and July 2015. As such, all within the one-year timeframe specified in the guidelines and therefore not a violation of Los Angeles County policy.

[2650] DRP 2017, Appendix 5.10-A

Response to Comment F.8-356:

The Project Traffic Study work effort was initiated in February 2015.[2651] Therefore, traffic counts should not be older than February 2014 based on a one-year criterion. The oldest traffic counts used for the intersection analysis are from March 2014 for intersections in the Santa Clarita Valley area and the remainder were collected in January 2015 and July 2015. As such, all are within the one-year timeframe specified in the CMP guidelines (LACMTA 2010 Congestion Management Program, Appendix D – Guidelines for CMP Transportation Impact Analysis, Section D.5.1 – Existing Traffic Conditions). Furthermore, the traffic counts taken at the two CMP study locations, 300th Street West at SR-138 and 60th Street West at SR-138, were done in July 2015, which is after the traffic study was initiated in February 2015.

Response to Comment F.8-357:

The Project Traffic Study (Draft EIR Appendix 5.10-A) work effort by Stantec was initiated in February 2015.[2652] Therefore, any traffic counts conducted on and after February 2014 are consistent with and fully comply with all applicable criteria. As shown in Draft EIR Table 5.10-3 ICU and LOS Summary – Existing (2014 and 2015) Conditions,[2653] the count data for intersections in the Santa Clarita Valley area are from March 2014 and January 2015, and the count data for intersections along the SR-138 and for intersections in Kern County are from July 2015. Therefore, all the counts are within the one-year time frame and comply with the Los Angeles County and Metro guidance.

Response to Comment F.8-358:

The Project Traffic Study work effort was initiated in February 2015.[2654] Therefore, any traffic counts conducted on and after February 2014 are consistent with and fully comply with all applicable criteria. As shown in Draft EIR Table 5.10-3 ICU and LOS Summary – Existing (2014 and 2015) Conditions,[2655] the oldest counts used in the traffic study are from March 2014 and January 2015 for intersections in the Santa Clarita Valley area, and the count data for intersections along the SR-138 and for intersections in Kern County are from July 2015. Therefore, all the counts are within the one-year timeframe recommended by the Transportation Impact Analysis for Site Development: An ITE Proposed Recommended Practice document by the Institute of Transportation Engineers (ITE).

Response to Comment F.8-359:

The Project Traffic Study work effort was initiated in February 2015.[2656] Therefore, any traffic counts conducted on and after February 2014 are consistent with and fully comply with all applicable criteria, Los Angeles County and Metro criteria. The oldest counts used in

2651 *Ibid.*
2652 *Ibid.*
2653 *Id.,* p. 5.10-21
2654 *Id.,* Appendix 5.10-A
2655 *Id.,* p. 5.10-21
2656 *Id.,* Appendix 5.10-A

the Centennial traffic study are from March 2014 for intersections in the Santa Clarita Valley area. The traffic counts from the remaining intersections were obtained in January and July 2015. Therefore, the counts used in the traffic study are within the one year timeframe specified in the Los Angeles County and Metro guidance (County of Los Angeles Department of Public Works Traffic Impact Report Guidelines, January 1997, County of Los Angeles Department of Public Works, Traffic and Lighting Division, Traffic Study Scoping, March 2014, and LACMTA 2010 Congestion Management Program, Appendix D – Guidelines for CMP Transportation Impact Analysis, Section D.5.1 – Existing Traffic Conditions).

Response to Comment F.8-360:

The traffic counts referenced in the comment were collected in July 2015 along SR-138, a rural highway with limited influence by school traffic, and a small number of other rural intersections in in Kern County. As reflected in the low intersection capacity utilization values in Draft EIR Table 5.10-3 ICU and LOS Summary – Existing (2014 and 2015) Conditions, the SR-138 and the nearby intersections are characterized by very low volumes currently.[2657] Due to the remote location of the highway, the volume of school trips in this rural area are minimal and would not affect the findings of the analysis. Specifically, a comparison was made between the traffic study counts dated July 2015 on the SR-138 and additional counts dated December 2015 on the SR-138.[2658] As shown in the table below, the comparison shows that along the SR-138 corridor, during the AM peak hour when school trips occur, traffic volumes in July (no-school days) are generally equivalent to the traffic volumes in December (school days). Therefore, due to the remote location of the SR-138 corridor, the volume of school trips is minimal and would not affect the findings of the analysis.

Intersection	AM Peak Hour Total		
	July 2015	December 2015	Difference
1. 300th St W & SR-138	198	183	-15
2. Three Points Road & SR-138	208	200	-8
4. 230th St W & SR-138	182	174	-8
5. 190th St W & SR-138	198	161	-37
6. 170th St W & SR-138	223	200	-23
7. 110th St W & SR-138	201	172	-29
8. 90th St & w SR-138	277	284	7
10. 30th St W & SR-138	261	239	-22
11. SR-14 SB Ramps & SR-138	269	248	-21
12. SR-14 NB Ramps & SR-138	184	204	20

Response to Comment F.8-361:

As noted in response to Comment F.8-360, due to the remote location of the highway, the volume of school trips in the rural area that is the subject of the comment are minimal and would not affect the findings of the analysis. Specifically, a comparison was made between

[2657] *Id.,* Table 5.10-3, p. 5.10-21; *Id.,* Exhibit 5.10-3

[2658] Caltrans, June 2017. Northwest SR-138 Corridor Improvement Project FEIR/EIS.

the traffic study counts dated July 2015 on the SR-138 and additional counts dated December 2015 on the SR-138.[2659] As shown in the table in response to Comment F.8-360, the comparison shows that along the SR-138 corridor, during the AM peak hour when school trips occur, traffic volumes in July (no-school days) are generally equivalent to the traffic volumes in December (school days). Therefore, due to the remote location of the SR-138 corridor, the volume of school trips is minimal and would not affect the findings of the analysis.

Response to Comment F.8-362:

The Project Traffic Study utilized data from multiple sources that were collected at multiple times to inform the analysis.[2660] Data published by the Caltrans Division of Traffic Operations represents the standardized set of traffic volumes for State highways. During the data collection effort undertaken for the Traffic Study that was initiated in February 2015, the 2014 Caltrans data represented the most current set of published information from the Caltrans Division of Traffic Operations.[2661] As discussed in the Traffic Study, new peak hour and daily traffic counts were collected along the SR-138 corridor and various other locations in 2015 specifically for use in the study.[2662]

Updated data typically is released by Caltrans one to two years after the end of the calendar year. As of September 2017, the most current published data from the Caltrans Division of Traffic Operations are the 2015 traffic counts.

Traffic counts from 2010 were obtained from the Los Angeles County Department of Public Works Machine Count Traffic Volumes database.[2663] The 2010 counts were utilized as a supplement to check the validity of the traffic counts collected in 2014 and in 2015 at the same locations on the SR-138. As discussed in the Traffic Study,[2664] the 2010 data from the LA County Public Works database was utilized only for derivation of representative K and D factors (peak hour and directional factors, respectively) for the SR-138. That data was only used to check the validity of the new traffic counts. However, the new counts were not adjusted to reflect 2010 conditions. As shown in Table 2-5 Freeway Peak Hour K & D Factors – Existing (2014 and 2015) Conditions,[2665] the K and D factors for the SR-138 reflect the K and D factors that were derived using the new 2015 peak hour counts. The 2010 traffic counts obtained from the Los Angeles County Department of Public Works Machine Count Traffic Volumes database were not utilized as a part of the impact analysis.

Response to Comment F.8-363:

As noted in response to Comment F.8-362, traffic counts from 2010 obtained from the Los Angeles County Department of Public Works Machine Count Traffic Volumes database were

[2659] Caltrans 2017
[2660] DRP 2017, Appendix 5.10-A
[2661] Caltrans, October 2015. 2014 Traffic Volumes on California State Highways.
[2662] DRP 2017, Appendix 5.10-A, Section 2.1.2
[2663] Los Angeles County Department of Public Works (LACDPW). 2015 (July). Machine Count Traffic Volumes database.
[2664] DRP 2017, Appendix 5.10-A, Section 2.1.2
[2665] *Id.,* Appendix 5.10-A, p. 2.19

utilized as a supplement to check the validity of the traffic counts collected in 2014 and in 2015 at the same locations on the SR-138.[2666] As discussed in the Project Traffic Study, "For SR 138, mid-block and intersection counts were collected in 2015 for use in this study".[2667] As shown in Table 2-5 Freeway Peak Hour K & D Factors – Existing (2014 and 2015) Conditions, the K and D factors for the SR-138 reflect the K and D factors that were derived using the new 2015 peak hour counts.[2668] The 2010 traffic counts obtained from the Los Angeles County Department of Public Works Machine Count Traffic Volumes database were not utilized as a part of the impact analysis.

Response to Comment F.8-364:

As noted in response to Comment F.8-362, traffic counts from 2010 obtained from the Los Angeles County Department of Public Works Machine Count Traffic Volumes database were utilized as a supplement to check the validity of the traffic counts collected in 2014 and in 2015 at the same locations on the SR-138.[2669] As discussed in the Project Traffic Study, "For SR 138, mid-block and intersection counts were collected in 2015 for use in this study".[2670] Furthermore, the new peak hour counts were not adjusted to reflect 2010 conditions. As shown in Table 2-5 Freeway Peak Hour K & D Factors – Existing (2014 and 2015) Conditions, the K and D factors for the SR-138 reflect the K and D factors that were derived using the new 2015 peak hour counts.[2671] The 2010 traffic counts obtained from the Los Angeles County Department of Public Works Machine Count Traffic Volumes database were not utilized as a part of the impact analysis. The actual intersection peak hour turning movement counts utilized for the SR-138 impact analysis were collected in 2015.[2672]

Response to Comment F.8-365:

As noted in response to Comment F.8-362, traffic counts from 2010 obtained from the Los Angeles County Department of Public Works Machine Count Traffic Volumes database were not utilized for the impact analysis.[2673] The actual intersection peak hour turning movement counts utilized for the SR-138 impact analysis were collected in 2015. As shown on Draft EIR page 5.10-21, Table 5.10-3 Existing ICU and LOS Summary – Existing (2014 and 2015) Conditions, the 2015 peak hour traffic counts collected along SR-138 indicate that SR-138 is operating well below capacity with level of service (LOS) A conditions at each intersection.

Response to Comment F.8-366:

The use of K and D factors for deriving peak hour traffic volumes is consistent with Caltrans methodology. The explanation of peak hour volume data and definitions of K and D factors available on Caltrans' Traffic Census Program webpage states that "peak hour volume data consists of hourly volume relationships and data location. The hourly volumes are expressed

2666 LACDPW 2015
2667 DRP 2017, Appendix 5.10-A, p. 2.6
2668 *Id.,* Appendix 5.10-A, p. 2.19
2669 LACDPW 2015
2670 DRP 2017, Appendix 5.10-A, p. 2.6
2671 *Id.,* Appendix 5.10-A, p. 2.19
2672 *Id.,* p. 5.10-21, Table 5.10-3 ICU and LOS Summary – Existing (2015 and 2015 Conditions)
2673 LACDPW 2015

as a percentage of Annual Average Daily Traffic (AADT). The percentages are shown for both the AM and the PM peak periods… KD multiplied with the AADT gives the one-way peak period directional flow rate or the design hourly volume (DHV). The design hourly volume is used for either Operational Analysis or Design Analysis".[2674] Therefore, since the peak hour volumes in the Project Traffic Study are used for the impact analysis, the use of K and D factors for deriving peak hour traffic volumes is consistent with Caltrans methodology.[2675]

Response to Comment F.8-367:

Due to the daily and seasonal variation in roadway traffic volumes, traffic counts by their very nature represent an estimate of conditions. A traffic count, regardless of when taken or for any finite duration, provides a representation of the expected, typical volume of traffic where the count was taken. Traffic counts are used by traffic engineers to gauge the relative volume of traffic for a given period of time at the count applicable location.

To document the volume of traffic on State highways, Caltrans utilizes a methodology where traffic counts are adjusted based on daily and seasonal factors, to provide an estimate of Average Annual Daily Traffic (AADT). Factors representing the proportion of traffic during the peak hour (K factors), and the percent of traffic in the peak direction (D factors) are derived by Caltrans for representative locations to derive the type of peak hour volumes used for roadway capacity and level of service (LOS) analysis. As such, the traffic volumes used for analysis are not intended to represent an exact volume of traffic from a specific day, but rather are representative estimates of the expected typical condition at the applicable locations. The methodology used in the Project Traffic Study[2676] for estimating existing condition traffic volumes is consistent with the Caltrans methodology of using K and D factors to derive the directional flow rate or the design hourly volume that is used for either Operational Analysis or Design Analysis.[2677]

Response to Comment F.8-368:

As noted in response to Comment F.8-367, K and D factors represent the percentage of traffic during the peak hour in the peak direction and do not represent a specific age of traffic volume data. The age of the peak hour data derived by the K and D factors is determined by the date of the AADT volumes used in an analysis. As discussed above, the Project Traffic Study utilizes the most current Caltrans AADT volumes available at the time of the analysis.[2678]

Response to Comment F.8-369:

The existing condition traffic counts used in the Project Traffic Study are a reasonable estimate of existing conditions since all the traffic counts at all the intersections were less

[2674] Caltrans. Peak Hour Volume Data. Sacramento, CA: Caltrans. http://www.dot.ca.gov/trafficops/census/docs/Peak-Hour-Definitions-K-and-D-Factors.pdf.
[2675] *Id.,* Appendix 5.10-A
[2676] *Ibid.*
[2677] Caltrans, Peak Hour Volume Data
[2678] DRP 2017, Appendix 5.10-A

than one year old at the time the traffic study was initiated in February 2015.[2679] Furthermore, as shown in the table in responses to Comments F.8-360 and F.8-361, at 8 of the 10 locations in the table, the AM peak hour counts collected in July 2015 are higher (more conservative) than comparable counts in December when school was in session. Due to the remote location of the SR-138 corridor, the volume of school trips is minimal and would not affect the findings of the analysis.

As noted in response to Comment F.8-367, K and D factors represent the percentage of traffic during the peak hour in the peak direction and do not represent a specific age of traffic volume data. The age of the peak hour data derived by the K and D factors is determined by the date of the AADT volumes used in an analysis. As discussed above, the Traffic Study utilizes the most current Caltrans AADT volumes available at the time of the analysis.

Response to Comment F.8-370:

As noted in response to Comment F.8-367, the existing condition traffic counts used in the Project Traffic Study provide a reasonably accurate estimate of existing conditions.[2680] The traffic study was initiated in February 2015 and utilized intersection counts not older than February 2014. For the state highway system, the most current Caltrans AADT volumes were used at the time the study was initiated in February 2015, and for SR-138, additional traffic counts were collected in July 2015. The traffic count data complies with all applicable Caltrans, County, and other requirements pertaining to the age of the data. As such, there is no need or basis for obtaining new traffic counts to revise the Traffic Study.

Response to Comment F.8-371:

As shown in Figure 4-1 on page 4.4 of the Project Traffic Study Average Daily Traffic Volumes – Project Only, the volume of Project traffic that is forecast to pass through the I-5/SR-99 interchange under existing conditions is approximately 8,000 ADT with approximately 6,000 ADT to/from the Bakersfield area via SR-99.[2681] The remaining 2,000 ADT would be oriented to/from the north via I-5. Under cumulative conditions, project traffic that is forecast to pass through the I-5/SR-99 interchange is approximately 4,000 ADT with approximately 3,000 ADT to/from the Bakersfield area via SR-99. The remaining 1,000 ADT would be oriented to/from the north via I-5. Because the northerly distribution of project traffic is primarily oriented to/from the Bakersfield area, the Traffic Analysis properly focuses on the SR-99 corridor.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In

2679 *Ibid.*
2680 *Ibid.*
2681 *Ibid.*

response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 corridor north of SR-99 under existing plus Project and cumulative plus Project conditions and demonstrates that the Project would not result in a significant impact on these segments of I-5.[2682]

Response to Comment F.8-372:

As shown in Figure 4-1 on page 4.4 of the Project Traffic Study Average Daily Traffic Volumes – Project Only, the volume of Project traffic that is forecast to pass through the I-5/SR-99 interchange under existing conditions is approximately 8,000 ADT with approximately 6,000 ADT to/from the Bakersfield area via SR-99.[2683] The remaining 2,000 ADT would be oriented to/from the north via I-5. Under cumulative conditions, project traffic that is forecast to pass through the I-5/SR-99 interchange is approximately 4,000 ADT with approximately 3,000 ADT to/from the Bakersfield area via SR-99. The remaining 1,000 ADT would be oriented to/from the north via I-5. Because the northerly distribution of project traffic is primarily oriented to/from the Bakersfield area, the Traffic Analysis properly focuses on the SR-99 corridor.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 corridor north of SR-99 under existing plus Project and cumulative plus Project conditions and demonstrates that the Project would not result in a significant impact on these segments of I-5.[2684]

Response to Comment F.8-373:

As shown in Figure 4-1 on page 4.4 of the Project Traffic Study Average Daily Traffic Volumes – Project Only, the volume of Project traffic that is forecast to pass through the I-5/SR-99 interchange under existing conditions is approximately 8,000 ADT with approximately 6,000

[2682] Final EIR Appendix 5.10-C, Table A-5
[2683] DRP 2017, Appendix 5.10-A
[2684] Final EIR Appendix 5.10-C, Table A-5

ADT to/from the Bakersfield area via SR-99.[2685] The remaining 2,000 ADT would be oriented to/from the north via I-5. Under cumulative conditions, project traffic that is forecast to pass through the I-5/SR-99 interchange is approximately 4,000 ADT with approximately 3,000 ADT to/from the Bakersfield area via SR-99. The remaining 1,000 ADT would be oriented to/from the north via I-5. Because the northerly distribution of project traffic is primarily oriented to/from the Bakersfield area, the Traffic Analysis properly focuses on the SR-99 corridor.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 corridor north of SR-99 under existing plus Project and cumulative plus Project conditions and demonstrates that the Project would not result in a significant impact on these segments of I-5.[2686]

Response to Comment F.8-374:

The Project Traffic Study utilizes the HCM methodology to calculate the theoretical amount of roadway capacity that is available at each freeway mainline analysis location.[2687] Draft EIR Table 5.10-2, page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions, shows each component that was considered to derive the roadway capacity estimates, which is based on the Highway Capacity Manual (HCM) methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates. The capacity estimates are then utilized to prepare volume to capacity ratio (V/C) calculations consistent with the V/C methodology specified by the County Congestion Management Plan.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In

[2685] DRP 2017, Appendix 5.10-A
[2686] Final EIR Appendix 5.10-C, Table A-5
[2687] DRP 2017, Appendix 5.10-A

response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-375:

The methodology used in the Project Traffic Study for evaluating freeway impacts was developed through consultations with Caltrans.[2688] As a result of these consultations, a blended approach utilizing the Highway Capacity Manual (HCM) methodology for capacity derivation and V/C ratios for the impact analysis was determined to be appropriate. V/C calculations area also consistent with the V/C methodology specified by the County Congestion Management Plan.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-376:

As noted in responses to Comments F.8-374 and F.8-375, V/C calculations were utilized to determine Project impacts based on the V/C methodology specified by the County Congestion Management Plan and after consultations with Caltrans. The capacities used for the V/C calculations were determined utilizing the Highway Capacity Manual (HCM) methodology. Draft EIR Table 5.10-2 on page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions shows each component considered to derive the roadway

[2688] *Ibid.*

capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-377:

As noted in responses to Comments F.8-374 and F.8-375, V/C calculations were utilized to determine Project impacts based on the V/C methodology specified by the County Congestion Management Plan and after consultations with Caltrans. The capacities used for the V/C calculations were determined utilizing Highway Capacity Manual (HCM) methodology. Draft EIR Table 5.10-2 on page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions shows each component considered to derive the roadway capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017, Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative)

traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-378:

As noted in response to Comment F.8-374, the Project Traffic Study utilizes the HCM methodology to calculate the capacity values used for the V/C calculations.[2689] As such, the same input variables used for a HCM calculation of speed and density are used for the V/C calculations. Accordingly, these V/C calculations are no less complex than a density calculation. Draft EIR Table 5.10-2, page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions, shows each component that was considered to derive the roadway capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-379:

While the HCM 2010 utilized density to determine LOS, the County Congestion Management (CMP) Plan utilizes V/C ratios for the determination of significant project impacts. As noted in responses to Comments F.8-374 and F.8-375, V/C calculations were utilized to determine Project impacts based on the V/C methodology specified by the County Congestion

[2689] *Id.,* Appendix 5.10-A

Management Plan and after consultations with Caltrans. HCM methodology was utilized in the preparation of V/C ratios to comply with CMP requirements.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the Highway Capacity Manual (HCM) volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-380:

As noted in responses to Comments F.8-374 and F.8-375, V/C calculations were utilized to determine Project impacts based on the V/C methodology specified by the County Congestion Management Plan and after consultations with Caltrans. The capacities used for the V/C calculations were determined utilizing Highway Capacity Manual (HCM) methodology. Draft EIR Table 5.10-2 on page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions shows each component considered to derive the roadway capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density

calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-381:

As noted in responses to Comments F.8-374 and F.8-375, V/C calculations were utilized to determine Project impacts based on the V/C methodology specified by the County Congestion Management Plan and after consultations with Caltrans. The capacities used for the V/C calculations were determined utilizing Highway Capacity Manual (HCM) methodology. Draft EIR Table 5.10-2 on page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions shows each component considered to derive the roadway capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

Response to Comment F.8-382:

Specifically for use in the Project Traffic Study, Caltrans provided input data such as that listed in the comment for use in deriving freeway capacities for the V/C calculations.[2690] Draft EIR Table 5.10-2, page 5.10-17 Capacities for Freeways and Expressways – Existing Conditions summarizes these input variables and the resulting Highway Capoacity Manual (HCM) variables used for analysis, which consist of the following:

1. Maximum service flow rate per mixed flow (general purpose) lane under ideal conditions (MSF)
2. Lane width factor (f_w)
3. Proportion of heavy vehicles (P_t)
4. Passenger car equivalent for heavy vehicles (E_t)
5. Heavy vehicle adjustment factor (f_{HV})
6. Driver population factor (f_p)
7. Service flow rate for LOS "E" (SF)

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative)

[2690] DRP 2017, Appendix 5.10-A

traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-383:

As noted in responses to Comments F.8-378 and F.8-382, the Project Traffic Study utilizes the HCM methodology to calculate the capacity values used for the V/C calculations.[2691] As such, the same input variables used for a Highway Capacity Manual (HCM) calculation of speed and density are used for the V/C calculations. Accordingly, these V/C calculations are no less complex than a density calculation. Draft EIR Table 5.10-2, page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions, shows each component that was considered to derive the roadway capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-384:

As noted in response to Comment F.8-382, the Project Traffic Study utilizes the standard Highway Capacity Manual (HCM) methodology to derive capacities for the impact analysis V/C calculations. As such, the same input variables used for a Highway Capacity Manual

[2691] *Ibid.*

(HCM) calculation of speed and density are used for the V/C calculations.[2692] Accordingly, these V/C calculations are no less complex than a density calculation. Draft EIR Table 5.10-2, page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions, shows each component that was considered to derive the roadway capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-385:

Although the comment accurately describes the standard V/C methodology, it does not accurately describe the use of the Highway Capacity Manual (HCM) to derive the capacities employed for the V/C calculations in the Project Traffic Study.[2693] This approach was utilized after consultations with Caltrans and to be consistent with the Los Angeles County Congestion Management Plan (CMP), which uses the V/C methodology in order to address the preferences of both the CMP and Caltrans for the analysis.[2694] A standard or typical capacity per lane was not used for the V/C analysis.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the

2692 *Ibid.*
2693 *Ibid.*
2694 *Id.,* Appendix 5.10-A, p. 1.9

Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-386:

The comment accurately restates the standard density calculation methodology as shown in Chapter 11 Basic Freeway Segments of the Highway Capacity Manual 2010.

Response to Comment F.8-387:

As noted in response to Comment F.8-382, the Project Traffic Study utilizes the standard Highway Capacity Manual (HCM) methodology to derive capacities for the impact analysis V/C calculations.[2695] As such, the same input variables used for a Highway Capacity Manual (HCM) calculation of speed and density are used for the V/C calculations. Accordingly, these V/C calculations are no less complex than a density calculation. Draft EIR Table 5.10-2, page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions, shows each component that was considered to derive the roadway capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017, Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant

[2695] *Id.,* Appendix 5.10-A

impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-388:

As noted in response to Comment F.8-382, the Project Traffic Study utilizes the standard Highway Capacity Manual (HCM) methodology to derive capacities for the impact analysis V/C calculations.[2696] As such, the same input variables used for a Highway Capacity Manual (HCM) calculation of speed and density are used for the V/C calculations. Accordingly, these V/C calculations are no less complex than a density calculation. Draft EIR Table 5.10-2, page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions, shows each component that was considered to derive the roadway capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-389:

This comment is part of a discussion of the use of the Highway Capacity Manual (HCM) methodology for the analysis of freeway ramps. As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as

[2696] *Ibid.*

Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable freeway ramps as well as other highway segments and intersections.

Response to Comment F.8-390:

This comment is part of a discussion of the use of the Highway Capacity Manual (HCM) methodology for the analysis of freeway ramps. As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable freeway ramps as well as other highway segments and intersections.

Response to Comment F.8-391:

This comment is part of a discussion of the use of the Highway Capacity Manual (HCM) methodology for the analysis of freeway ramps. As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the

Project will not result in any new or more severe significant impacts to applicable freeway ramps as well as other highway segments and intersections.

Response to Comment F.8-392:

The Project Traffic Study includes a ramp capacity analysis to determine if sufficient capacity exists on the ramps to accommodate future projected increases in traffic volumes.[2697] The analysis does not in any manner ignore the interaction between freeway ramps and traffic on adjacent freeway segments.

This comment is part of a discussion of the use of the Highway Capacity Manual (HCM) methodology for the analysis of freeway ramps. As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable freeway ramps as well as other highway segments and intersections.

Response to Comment F.8-393:

Comment noted. During consultations with Caltrans, it was determined that the Highway Capacity Manual (HCM) 2010 analysis methodology was the appropriate method to evaluate SR-138 based on the existing configuration as a two-lane rural highway.

Response to Comment F.8-394:

The methodology used in the Project Traffic Study for evaluating impacts to multilane expressways.[2698] including the future configuration of SR-138, was developed through consultations with Caltrans. These discussions determined that a blended approach utilizing Highway Capacity Manual (HCM) methodology for capacity derivation and V/C ratios consistent with the Los Angeles County Congestion Management Plan (CMP) for impact analysis was appropriate.[2699]

[2697] DRP 2017, Appendix 5.10-A
[2698] *Ibid.*
[2699] *Id.,* Appendix 5,10-A, p. 1.9

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable freeway ramps as well as other highway segments and intersections.

Response to Comment F.8-395:

As discussed above, the Highway Capacity Manual (HCM) utilizes different methodologies based on the type of facility being analyzed. For example, the level of service (LOS) for a two-lane rural highway is determined based on the "percent of time spent following", whereas the LOS for a multi-lane highway is determined based on "density". Through consultation with Caltrans, it was determined that "percent of time spent following" would be the most appropriate approach for evaluating the existing configuration of SR-138. Therefore, the HCM 2010 methodology was utilized to evaluate existing conditions for SR-138. For future multi-lane configurations, including SR-138, after consultations with Caltrans the V/C methodology was used in the analysis to be consistent with the Los Angeles County Congestion Management Plan. Capacity estimates on the SR-138 were derived using variables consistent with the HCM methodology. Standard or typical capacities were not used for the V/C analysis. Draft EIR Table 5.10-2, page 5.10-17, Capacities for Freeways and Expressways – Existing Conditions, shows each component that was considered to derive the roadway capacity estimates, which is based on the HCM methodology. Roadway segment characteristics such as the number of lanes, service flow rate per lane under ideal conditions, lane width factor, proportion of heavy vehicles, passenger car equivalent for heavy vehicles, heavy vehicle adjustment factor, and driver population factor are all used to derive the roadway capacity estimates.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative)

traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-396:

The assignment of traffic volumes for cumulative conditions was prepared using the North County Sub-Area Travel Demand Model, which was most recently used by Los Angeles County when developing the Antelope Valley Area Plan (AVAP). The traffic model was first developed for use by Caltrans for the Northwest SR-138 Corridor Project analysis. The model represents a combination of the SCAG RTP/SCS model and the KernCOG model. As such, the future year traffic forecasts presented in the Centennial Traffic Study and the assignment of project trips to I-5 are consistent with recent planning studies by the County and Caltrans.

Response to Comment F.8-397:

The most current traffic data from Caltrans (2015) indicates that the segment of I-5 just north of the I-5/SR-99 split currently carries 34,000 AADT,[2700] which is lower than the volume of 48,000 ADT inferred by the data shown in the Project Traffic Study, Figure 2-4 Existing (2014 & 2015) AADT and ADT Volumes.[2701] AADT and ADT volumes are presented in the traffic study for informational purposes, as the impact analysis is based on peak hour trips. As such, any revisions to the ADT volumes would not affect the Draft EIR impact analysis.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017, Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. As shown in the STS, HCM volume-density calculations have been prepared for each of the freeways within the study area and the LOS based on the HCM volume-density calculations are consistent with the V/C based analysis. The STS includes an analysis of the I-5 at the split with SR-99 and north of SR-99 under existing plus Project and cumulative plus Project conditions during the peak AM and PM hours that is not affected by the ADT value

[2700] Caltrans. 2015 (October). 2014 Traffic Volumes on California State Highways.
[2701] DRP 2017. Appendix 5.10-A

discussed above.[2702] The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-398:

The most current traffic data from Caltrans (2015) indicates that the segment of I-5 just north of the I-5/SR-99 split currently carries 34,000 AADT,[2703] which is lower than the volume of 48,000 ADT inferred by the data shown in the Project Traffic Study, Figure 2-4 Existing (2014 & 2015) AADT and ADT Volumes.[2704] AADT and ADT volumes are presented in the traffic study for informational purposes, as the impact analysis is based on peak hour trips. As such, any revisions to the ADT volumes would not affect the Draft EIR impact analysis. Furthermore, due to a typographical error, the Cumulative Condition No-Project ADT volume for the segment of I-5 just south of SR-99, which is estimated to be 114,300 ADT, is incorrectly shown as 110,250 on page 4.32, Table 4-6 of the Traffic Study,[2705] as are the associated peak hour volumes for that segment. Based on the revised volumes, the segment of I-5 north of the I-5/SR-99 split is forecast to be 48,000 ADT, an increase of 14,000 ADT over the 2015 volume reported by Caltrans. Revisions to the I-5 volumes noted above do not affect the Draft EIR impact analysis as demonstrated in the STS.[2706]

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 at the split with SR-99 and north of SR-99 under existing plus Project and cumulative plus Project conditions during the peak AM and PM hours that is not affected by the ADT value discussed above.[2707] The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

[2702] Final EIR Appendix 5.10-C, Table A-5
[2703] Caltrans 2015, 2014 Traffic Volumes on California State Highways
[2704] DRP 2017, Appendix 5.10-A
[2705] *Ibid.*
[2706] Final EIR Appendix 5.10-C, Table A-5
[2707] *Ibid.*

Response to Comment F.8-399:

The most current traffic data from Caltrans (2015) indicates that the segment of I-5 just north of the I-5/SR-99 split currently carries 34,000 AADT,[2708] which is lower than the volume of 48,000 ADT inferred by the data shown in the Project Traffic Study, Figure 2-4 Existing (2014 & 2015) AADT and ADT Volumes.[2709] AADT and ADT volumes are presented in the traffic study for informational purposes, as the impact analysis is based on peak hour trips. As such, any revisions to the ADT volumes would not affect the Draft EIR impact analysis. As discussed in response to Comment F.8-398, the correct Cumulative Condition No-Project ADT volume for the segment of I-5 just south of SR-99 is110,250 ADT. Based on the revised volumes, the segment of I-5 north of the I-5/SR-99 split is forecast to be 48,000 ADT, an increase of 14,000 ADT over the 2015 volume reported by Caltrans. As noted in response to Comment F.8-397, AADT and ADT volumes are presented in the traffic study for informational purposes, as the impact analysis is based on peak hour trips. As such, any revisions to the ADT volumes do not affect the Draft EIR impact analysis.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 at the split with SR-99 and north of SR-99 under existing plus Project and cumulative plus Project conditions during the peak AM and PM hours that is not affected by the ADT value discussed above (see Final EIR Appendix 5.10-C, Table A-5). The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-400:

The comment references a conceptual study prepared by Caltrans (2013 I-5 Transportation Concept Report) ("I-5 TCR") that is inconsistent with more recent analyses published by Caltrans and with historical traffic counts provided by Caltrans. As shown in the table below, the I-5 TCR assumes that from 2011 to 2035, I-5 AADT traffic volumes will increase by 5.1 percent south and north of the SR-99 split, and north of SR-138. As discussed in more detail in response to Comment F.8-17, in June 2017 Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR"). The NW SR-138 FEIR provides a more recent analysis of projected traffic growth on these segments, which range from 2.6 percent to approximately 3 percent per year. The AADT for I-5 in 2040 projected in

[2708] Caltrans 2015, 2014 Traffic Volumes on California State Highways
[2709] DRP 2017, Appendix 5.10-A

the NW SR-138 FEIR north of SR-138 (122,600), is consistent with the 2035 AADT reported in the Draft EIR for this same location (124,000), which is also consistent with the volume shown in the referenced table from the Draft EIR (118,000) for south of the I-5/SR-99 split. Finally, as shown in the table below, over the past 10 years, Caltrans traffic counts show that AADT on the segments of I-5 north and south of the SR-99 interchange have increased at an average annual rate of just 0.6 percent and 1.5 percent, respectively, while AADT levels have actually declined north and south of SR-138.

GROWTH RATE COMPARISON

I-5 TCR	2011	2035	Total Growth %	Annual Growth %
I-5 n/o SR-99	41,000	91,100	122%	5.1%
I-5 s/o SR-99	81,000	179,900	122%	5.1%
I-5 n/o SR-138	75,000	166,600	122%	5.1%
NW SR-138 Corridor Study	**2012**	**2040**	**Total Growth %**	**Annual Growth %**
I-5 n/o SR-138	70,600	122,600	73%	2.6%
I-5 s/o SR-138	67,900	125,800	85%	3.0%
Caltrans Traffic Volume Reports	**2005**	**2015**	**Total Growth %**	**Annual Growth %**
I-5 n/o SR-99	32,000	34,000	6%	0.6%
I-5 s/o SR-99	71,000	82,000	15%	1.5%
I-5 n/o SR-138	73,000	72,000	-1%	-0.1%
I-5 s/o SR-138	72,000	70,000	-3%	-0.3%

Consequently, the 2013 I-5 TCR is not consistent with the more recent projections provided by Caltrans in the 2017 NW SR-138 FEIR and is not supported by Caltrans' traffic counts at the I-5/SR-99 split and at SR-138. In July 2017, Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the preferred SR-138 Alternative 2 ("Alt2") facilities to be consistent with the NW SR-138NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 north and south of SR-99 and north and south of SR-138 under existing plus Project and cumulative plus Project conditions during the peak AM and PM hours that is consistent with the most current Caltrans projections and traffic count information.[2710] The STS also demonstrates that, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

[2710] Final EIR Appendix 5.10-C, Table A-5

Response to Comment F.8-401:

As discusssed in response to Comment F.8-400, this comment is based on a conceptual study prepared by Caltrans (2013 I-5 Transportation Concept Report) ("I-5 TCR") that is inconsistent with more recent analyses published by Caltrans and with historical traffic counts documented by Caltrans. As shown in the table in response to Comment F.8-400, the I-5 TCR assumes that from 2011 to 2035, I-5 AADT traffic volumes will increase by 5.1 percent south north of the SR-99 split, and north of SR-138. As discussed in more detail in response to Comment F.8-17, in June 2017 Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR"). The NW SR-138 FEIR provides a more recent analysis of projected traffic growth on these segments, which range from 2.6 percent to approximately 3 percent per year. The AADT for I-5 in 2040 projected in the NW SR-138NW SR-138 FEIR north of SR-138 (122,600), is consistent with the 2035 AADT reported in the Draft EIR for this same location (124,000), which is also consistent with the volume shown in the referenced table from the Draft EIR in Comment F.8-400 (118,000) for south of the I-5/SR-99 split. Finally, as shown in the table in response to Comment F.8-400, over the past 10 years, Caltrans traffic counts show that AADT on the segments of I-5 north and south of the SR-99 interchange have increased at an average annual rate of just 0.6 percent and 1.5 percent, respectively, while AADT levels have actually declined north and south of SR-138.

Consequently, the 2013 I-5 TCR is not consistent with the more recent projections provided by Caltrans in the 2017 NW SR-138 FEIR and is not supported by Caltrans' traffic counts at the I-5/SR-99 split and at SR-138. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the preferred SR-138 Alternative 2 ("Alt2") facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Draft EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the Highway Capacity Manual (HCM) utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 north and south of SR-99 and north and south of SR-138 under existing plus Project and cumulative plus Project conditions during the peak AM and PM hours that is consistent with the most current Caltrans projections and traffic count information.[2711] The STS also demonstrates that, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-402:

As discusssed in response to Comment F.8-400, this comment is based on a conceptual study prepared by Caltrans (2013 I-5 Transportation Concept Report) ("I-5 TCR") that is inconsistent with more recent analyses published by Caltrans and with historical traffic counts documented by Caltrans. As shown in the table in response to Comment F.8-400, the I-5 TCR assumes that from 2011 to 2035, I-5 AADT traffic volumes will increase by 5.1 percent south north of the SR-99 split, and north of SR-138. As discussed in more detail in

[2711] *Ibid.*

response to Comment F.8-17, in June 2017 Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR"). The NW SR-138 FEIR provides a more recent analysis of projected traffic growth on these segments, which range from 2.6 percent to approximately 3 percent per year. The AADT for I-5 in 2040 projected in the NW SR-138 FEIR north of SR-138 (122,600), is consistent with the 2035 AADT reported in the Draft EIR for this same location (124,000), which is also consistent with the volume shown in the referenced table from the Draft EIR in Comment F.8-400 (118,000) for south of the I-5/SR-99 split. Finally, as shown in the table in response to Comment F.8-400, over the past 10 years, Caltrans traffic counts show that AADT on the segments of I-5 north and south of the SR-99 interchange have increased at an average annual rate of just 0.6 percent and 1.5 percent, respectively, while AADT levels have actually declined north and south of SR-138.

Consequently, the 2013 I-5 TCR is not consistent with the more recent projections provided by Caltrans in the 2017 NW SR-138 FEIR and is not supported by Caltrans' traffic counts at the I-5/SR-99 split and at SR-138. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the preferred SR-138 Alternative 2 ("Alt2") facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 north and south of SR-99 and north and south of SR-138 under existing plus Project and cumulative plus Project conditions during the peak AM and PM hours that is consistent with the most current Caltrans projections and traffic count information.[2712] The STS also demonstrates that, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR. Consequently, the analysis of the referenced facility in the comment is consistent with more recent and reliable Caltrans data, including the 2017 NW SR-138 FEIR, and provides an accurate and meaningful analysis of potential impacts to that facility using the HCM as well as the V/C methodologies.

Response to Comment F.8-403:

As discusssed in response to Comment F.8-400, this comment is based on a conceptual study prepared by Caltrans (2013 I-5 Transportation Concept Report) ("I-5 TCR") that is inconsistent with more recent analyses published by Caltrans and with historical traffic counts documented by Caltrans. As shown in the table in response to Comment F.8-400, the I-5 TCR assumes that from 2011 to 2035, I-5 AADT traffic volumes will increase by 5.1 percent south north of the SR-99 split, and north of SR-138. As discussed in more detail in response to Comment F.8-17, in June 2017 Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR"). The NW SR-138 FEIR provides a more recent analysis of projected traffic growth on these segments, which range from 2.6 percent to approximately 3 percent per year. The AADT for I-5 in 2040 projected in the NW SR-138 FEIR north of SR-138 (122,600), is consistent with the 2035 AADT reported

[2712] *Ibid.*

in the Draft EIR for this same location (124,000), which is also consistent with the volume shown in the referenced table from the Draft EIR in Comment F.8-400 (118,000) for south of the I-5/SR-99 split. Finally, as shown in the table in response to Comment F.8-400, over the past 10 years, Caltrans traffic counts show that AADT on the segments of I-5 north and south of the SR-99 interchange have increased at an average annual rate of just 0.6 percent and 1.5 percent, respectively, while AADT levels have actually declined north and south of SR-138.

Consequently, the 2013 I-5 TCR is not consistent with the more recent projections provided by Caltrans in the 2017 NW SR-138 FEIR and is not supported by Caltrans' traffic counts at the I-5/SR-99 split and at SR-138. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the preferred SR-138 Alternative 2 ("Alt2") facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 north and south of SR-99 and north and south of SR-138 under existing plus Project and cumulative plus Project conditions during the peak AM and PM hours that is consistent with the most current Caltrans projections and traffic count information.[2713] The STS also demonstrates that, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR. Consequently, the analysis of the referenced facility in the comment is consistent with more recent and reliable Caltrans data, including the 2017 NW SR-138 FEIR, and provides an accurate and meaningful analysis of potential impacts to that facility using the HCM as well as the V/C methodologies.

Response to Comment F.8-404:

Due to a typographical error, the ADT volume shown for the I-5 segment Vista Del Lago Road to Templin Highway and the segment from Templin Highway to Lake Hughes Road for cumulative conditions without the Project should be 110,000 and 111,000, respectively. Accordingly, the net increment of Project traffic should be 19,000 ADT at each location. As shown in the table below, the corrected values for the cumulative conditions without the Project at these locations results in a linear change from 22,000 to 11,000 ADT between SR-138 and Smoky Bear Road and Hasley Canyon and SR-126. Minimal change occurs in the segments between Smokey Bear Road and Parker Road due to a lack of development in those areas.

As discussed above, ADT volumes are presented in the traffic study for informational purposes.[2714] The actual impact analysis is based on peak hour trips which are not affected by the ADT information in the study. As shown in the Project Traffic Study, Table 4-6 Freeway Volume & Capacity Summary – Cumulative (2035 & 2040) Conditions, the traffic study accurately depicts the net change in peak hour traffic forecasts between conditions

[2713] *Ibid.*
[2714] DRP 2017, Appendix 5.10-A

with and without the Project.[2715] The corrections to the ADT volumes in the table below do not affect the results of the impact analysis.

	Cumulative with Project	Cumulative without Project	Project Increment
10. Between South Jct SR-138 and Smokey Bear Rd	127,000	105,000	22,000
11. Between Smokey Bear Rd and Vista Del Lago Rd	129,000	110,000	19,000
12. Between Vista Del Lago Rd and Templin Hwy	129,000	**110,000**	**19,000**
13. Between Templin Hwy and Lake Hughes Rd	130,000	**111,000**	**19,000**
14. Between Lake Hughes Rd and Parker Rd	158,000	140,000	18,000
15. Between Parker Rd and Hasley Canyon Rd	175,000	160,000	15,000
16. Between Hasley Canyon Rd and North Jct SR-126	174,000	163,000	11,000
Bold = Revised ADT Volume			

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR for peak AM and PM hours and are not affected by the ADT corrections at the two freeway segments discussed above. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-405:

As noted in response to Comment F.8-404, the ADT volume shown for the I-5 segment Vista Del Lago Road to Templin Highway and the segment from Templin Highway to Lake Hughes Road for cumulative conditions without the Project should be 110,000 and 111,000, respectively. Accordingly, the net increment of Project traffic should be 19,000 ADT at each location. As shown in the table in response to Comment F.8-404, the corrected values for the cumulative conditions without the Project at these locations results in a linear change from 22,000 to 11,000 ADT between SR-138 and Smoky Bear Road and Hasley Canyon and SR-126. Minimal change occurs in the segments between Smokey Bear Road and Parker Road due to a lack of development in those areas.

[2715] *Ibid.*

As discussed above, ADT volumes are presented in the traffic study for informational purposes.[2716] The actual impact analysis is based on peak hour trips which are not affected by the ADT information in the study. As shown in the Project Traffic Study, Table 4-6 Freeway Volume & Capacity Summary – Cumulative (2035 & 2040) Conditions, the traffic study accurately depicts the net change in peak hour traffic forecasts between conditions with and without the Project.[2717] The corrections to the ADT volumes in the table below do not affect the results of the impact analysis.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017, Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR for peak AM and PM hours and are not affected by the ADT corrections at the two freeway segments discussed above. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-406:

As noted in response to Comment F.8-404, the ADT volume shown for the I-5 segment Vista Del Lago Road to Templin Highway and the segment from Templin Highway to Lake Hughes Road for cumulative conditions without the Project should be 110,000 and 111,000, respectively. Accordingly, the net increment of Project traffic should be 19,000 ADT at each location. As shown in the table in response to Comment F.8-404, the corrected values for the cumulative conditions without the Project at these locations results in a linear change from 22,000 to 11,000 ADT between SR-138 and Smoky Bear Road and Hasley Canyon and SR-126. Minimal change occurs in the segments between Smokey Bear Road and Parker Road due to a lack of development in those areas.

As discussed above, ADT volumes are presented in the traffic study for informational purposes.[2718] The actual impact analysis is based on peak hour trips which are not affected by the ADT information in the study. As shown in the Project Traffic Study, Table 4-6 Freeway Volume & Capacity Summary – Cumulative (2035 & 2040) Conditions, the traffic study accurately depicts the net change in peak hour traffic forecasts between conditions

2716 *Ibid.*
2717 *Ibid.*
2718 *Ibid.*

with and without the Project.[2719] The corrections to the ADT volumes in the table below do not affect the results of the impact analysis.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR for peak AM and PM hours and are not affected by the ADT corrections at the two freeway segments discussed above. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-407:

As noted in response to Comment F.8-404, the ADT volume shown for the I-5 segment Vista Del Lago Road to Templin Highway and the segment from Templin Highway to Lake Hughes Road for cumulative conditions without the Project should be 110,000 and 111,000, respectively. Accordingly, the net increment of Project traffic should be 19,000 ADT at each location. As shown in the table in response to Comment F.8-404, the corrected values for the cumulative conditions without the Project at these locations results in a linear change from 22,000 to 11,000 ADT between SR-138 and Smoky Bear Road and Hasley Canyon and SR-126. Minimal change occurs in the segments between Smokey Bear Road and Parker Road due to a lack of development in those areas.

As discussed above, ADT volumes are presented in the traffic study for informational purposes.[2720] The actual impact analysis is based on peak hour trips which are not affected by the ADT information in the study. As shown in the Project Traffic Study, Table 4-6 Freeway Volume & Capacity Summary – Cumulative (2035 & 2040) Conditions, the traffic study accurately depicts the net change in peak hour traffic forecasts between conditions with and without the Project.[2721] The corrections to the ADT volumes in the table below do not affect the results of the impact analysis.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis

[2719] *Ibid.*
[2720] *Ibid.*
[2721] *Ibid.*

discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR for peak AM and PM hours and are not affected by the ADT corrections at the two freeway segments discussed above. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-408:

As noted in response to Comment F.8-404, the ADT volume shown for the I-5 segment Vista Del Lago Road to Templin Highway and the segment from Templin Highway to Lake Hughes Road for cumulative conditions without the Project should be 110,000 and 111,000, respectively. Accordingly, the net increment of Project traffic should be 19,000 ADT at each location. As shown in the table in response to Comment F.8-404, the corrected values for the cumulative conditions without the Project at these locations results in a linear change from 22,000 to 11,000 ADT between SR-138 and Smoky Bear Road and Hasley Canyon and SR-126. Minimal change occurs in the segments between Smokey Bear Road and Parker Road due to a lack of development in those areas.

As discussed above, ADT volumes are presented in the traffic study for informational purposes.[2722] The actual impact analysis is based on peak hour trips which are not affected by the ADT information in the study. As shown in the Project Traffic Study, Table 4-6 Freeway Volume & Capacity Summary – Cumulative (2035 & 2040) Conditions, the traffic study accurately depicts the net change in peak hour traffic forecasts between conditions with and without the Project.[2723] The corrections to the ADT volumes in the table below do not affect the results of the impact analysis.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR for peak AM and PM hours and are not affected by the ADT corrections at the two freeway segments discussed above. The STS also demonstrates that, using the HCM

[2722] *Ibid.*
[2723] *Ibid.*

methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-409:

As noted in response to Comment F.8-404, the ADT volume shown for the I-5 segment Vista Del Lago Road to Templin Highway and the segment from Templin Highway to Lake Hughes Road for cumulative conditions without the Project should be 110,000 and 111,000, respectively. Accordingly, the net increment of Project traffic should be 19,000 ADT at each location. As shown in the table in response to Comment F.8-404, the corrected values for the cumulative conditions without the Project at these locations results in a linear change from 22,000 to 11,000 ADT between SR-138 and Smoky Bear Road and Hasley Canyon and SR-126. Minimal change occurs in the segments between Smokey Bear Road and Parker Road due to a lack of development in those areas.

As discussed above, ADT volumes are presented in the traffic study for informational purposes.[2724] The actual impact analysis is based on peak hour trips which are not affected by the ADT information in the study. As shown in the Project Traffic Study, Table 4-6 Freeway Volume & Capacity Summary – Cumulative (2035 & 2040) Conditions, the traffic study accurately depicts the net change in peak hour traffic forecasts between conditions with and without the Project.[2725] The corrections to the ADT volumes in the table below do not affect the results of the impact analysis.

As discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017, Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR for peak AM and PM hours and are not affected by the ADT corrections at the two freeway segments discussed above. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

Response to Comment F.8-410:

The comment does not cite the text of MM 10-5 or the mandatory implementing provisions included in the Mitigation Monitoring and Reporting Program (MMRP) for the Project.[2726] MM 10-5 specifically requires that, prior to the issuance of each constuction permit, the

[2724] *Ibid.*
[2725] *Ibid.*
[2726] Final EIR Appendix 2.0-C.Rev

Project Applicant/Developer must submit a Traffic Management Plan to the County Department of Public Works for review and approval. The Traffic Management Plans must describe traffic-control measures that maintain traffic flow in all directions, including where utilities and other improvements are being implemented in existing roadways. The Traffic Management Plans are also required to identify: construction haul routes; duration and location of lane closures; location of parking for the public and construction workers during construction phases; use of flag persons; and any pedestrian-related impacts to sidewalks and intersection crossings. The Traffic Management Plan must be implemented during all stages of Project construction that generate traffic impacts. The implementation of construction traffic management plans during project development, particularly for projects that will be developed over time, is appropriate to mitigate for impacts associated with each increment of development. If a plan fails to meet the requirements in MM 10-5, the County has the discretion to not issue construction permits until the proposed construction, or the plan, are revised to the satisfaction of the County.

Response to Comment F.8-411:

MM 10-5 and the mandatory implementing provisions included in the Mitigation Monitoring and Reporting Program (MMRP)[2727] for the Project specifically require that, prior to the issuance of each constuction permit, the Project Applicant/Developer must submit a Traffic Management Plan to the County Department of Public Works for review and approval. The Traffic Management Plans must describe traffic-control measures that maintain traffic flow in all directions, including where utilities and other improvements are being implemented in existing roadways. The Traffic Management Plans are also require to identify: construction haul routes; duration and location of lane closures; location of parking for the public and construction workers during construction phases; use of flag persons; and any pedestrian-related impacts to sidewalks and intersection crossings. The Traffic Management Plan must be implemented during all stages of Project construction that generate traffic impacts. The implementation of construction traffic management plans during project development, particularly for projects that will be developed over time, is appropriate to mitigate for impacts associated with each increment of development. If a plan fails to meet the requirements in MM 10-5, the County has the discretion to not issue construction permits until the proposed construction, or the plan, are revised to the satisfaction of the County. See also responses to Comments F.8-10 to F.8-12 concerning CEQA requirements for describing a project's phasing and buildout, none of which require the level of specificity suggested in the comment.

Response to Comment F.8-412:

MM 10-5 and the mandatory implementing provisions included in the Mitigation Monitoring and Reporting Program (MMRP)[2728] for the Project specifically require that, prior to the issuance of each constuction permit, the Project Applicant/Developer must submit a Traffic Management Plan to the County Department of Public Works for review and approval. The Traffic Management Plans must describe traffic-control measures that maintain traffic flow

[2727] *Ibid.*
[2728] *Ibid.*

in all directions, including where utilities and other improvements are being implemented in existing roadways. The Traffic Management Plans are also require to identify: construction haul routes; duration and location of lane closures; location of parking for the public and construction workers during construction phases; use of flag persons; and any pedestrian-related impacts to sidewalks and intersection crossings. The Traffic Management Plan must be implemented during all stages of Project construction that generate traffic impacts. The implementation of construction traffic management plans during project development, particularly for projects that will be developed over time, is appropriate to mitigate for impacts associated with each increment of development. If a plan fails to meet the requirements in MM 10-5, the County has the discretion to not issue construction permits until the proposed construction, or the plan, are revised to the satisfaction of the County. See also responses to Comments F.8-10 to F.8-12 concerning CEQA requirements for describing a project's phasing and buildout, none of which require the level of specificity suggested in the comment.

Response to Comment F.8-413:

MM 10-5 and the mandatory implementing provisions included in the Mitigation Monitoring and Reporting Program (MMRP)[2729] for the Project specifically require that, prior to the issuance of each constuction permit, the Project Applicant/Developer must submit a Traffic Management Plan to the County Department of Public Works for review and approval. The Traffic Management Plans must describe traffic-control measures that maintain traffic flow in all directions, including where utilities and other improvements are being implemented in existing roadways. The Traffic Management Plans are also required to identify: construction haul routes; duration and location of lane closures; location of parking for the public and construction workers during construction phases; use of flag persons; and any pedestrian-related impacts to sidewalks and intersection crossings. The Traffic Management Plan must be implemented during all stages of Project construction that generate traffic impacts. The implementation of construction traffic management plans during project development, particularly for projects that will be developed over time, is appropriate to mitigate for impacts associated with each increment of development. If a plan fails to meet the requirements in MM 10-5, the County has the discretion to not issue construction permits until the proposed construction, or the plan, are revised to the satisfaction of the County. See also responses to Comments F.8-10 to F.8-12 concerning CEQA requirements for describing a project's phasing and buildout, none of which require the level of specificity suggested in the comment.

Response to Comment F.8-414:

MM 10-5 and the mandatory implementing provisions included in the Mitigation Monitoring and Reporting Program (MMRP)[2730] for the Project specifically require that, prior to the issuance of each constuction permit, the Project Applicant/Developer must submit a Traffic Management Plan to the County Department of Public Works for review and approval. The Traffic Management Plans must describe traffic-control measures that maintain traffic flow

[2729] *Ibid.*
[2730] *Ibid.*

in all directions, including where utilities and other improvements are being implemented in existing roadways. The Traffic Management Plans are also required to identify: construction haul routes; duration and location of lane closures; location of parking for the public and construction workers during construction phases; use of flag persons; and any pedestrian-related impacts to sidewalks and intersection crossings. The Traffic Management Plan must be implemented during all stages of Project construction that generate traffic impacts. The implementation of construction traffic management plans during project development, particularly for projects that will be developed over time, is appropriate to mitigate for impacts associated with each increment of development. If a plan fails to meet the requirements in MM 10-5, the County has the discretion to not issue construction permits until the proposed construction, or the plan, are revised to the satisfaction of the County. See also responses to Comments F.8-10 to F.8-12 concerning CEQA requirements for describing a project's phasing and buildout, none of which require the level of specificity suggested in the comment.

Response to Comment F.8-415:

As discussed on Draft EIR page 5.10-51, the North County Sub-Area Model used by Los Angeles County for the Antelope Valley Area Plan (AVAP) was also utilized in the Draft EIR. The model show that 40 percent of the trips made on-site would be 3 miles or less in length, and nearly 70 percent of all internal trips would be 4 miles or less. As shown in Table 3.8 of the traffic study,[2731] the North County Sub-Area Model results estimate that, on average, each internal Project trip will be 3.4 miles in length. The model estimates that an average external trip will be 45.9 miles in length. Finally, the North County Sub-Area Model estimates that 48 percent of all trips will be internal and 52 percent of all trips will be external to the Project. Consequently, the average Project trip is estimated to be 25.5 miles in length.

As discussed in more detail in response to Comment F.8-23, the North County Sub-Area Model these results are consistent with applicable traffic models for the Lancaster/Palmdale area, which is larger than the Project but also relatively isolated from other developed amenity and employment locations, project that 70 percent of all tripends are internal to the region (Enhanced Antelope Valley Transportation Analysis Model Version 2.0, City of Palmdale). Similarly, traffic models indicate that 74 percent of the total tripends in the Santa Clarita Valley will be internal when the region is built out (Santa Clarita Valley Consolidated Traffic Model Version 4.1, City of Santa Clarita and the County of Los Angeles). The North County Sub-Area Model estimates of the Project's average daily internal and external trips and tripends at buildout are also consistent with 2011-2015 American Community Survey (ACS) 5-Year Estimates of the percentage of all workers aged 16 or older working in their places of residence, or internal to 11 communities that are relatively isolated from other employment locations and that have approximately the same average total workforce as the Project at full buildout. The ACS data indicates that the percentage of workers that are employed in their place of residence ranges from 60 percent in Santa Maria, California to 46 percent in Lancaster, California and 32 percent in Palmdale, California. The average percentage of work within the place of residence for the 11 communities is 48 percent, which

[2731] DRP 2017, Appendix 5.10-A

is conistent with the mode results. The ACS time of travel to work data for the 11 communities show that, in locations such as Palmdale with a relatively high percentage of external work trips, trip times are comparatively high because a greater percentage of the residents in these communities commute to employment in other, relatively distant locations. The ACS data for Palmdale, for example, show daily work trips average nearly 41 minutes. This result is consistent with the North County Sub-Area Model estimate that external Project trips, without accounting for the proportion of work trips that would be internal to the project, would average about 45.9 miles (e.g., about 45 minutes at an average of 60 miles per hour). The ACS data further indicate that, on average, a relatively isolated community in which 52 percent of work trips are external and 48 percent of work trip are internal would have an average commute time of about 25.3 minutes. This is also generally consistent with the model estimate that average trips would be about 25.5 miles for the Project.

The model results reported in the Draft EIR, however, do not take into account the Project's Transportation Management Association (TMA) and other measures required in the Mitigation Monitoring and Reporting Program (MMRP).[2732] As discussed in more detail in response to Comment F.8-15, The Project's transportation management obligations are discussed in Draft EIR Section 4.5.5, Mobility Plan and on Draft EIR pages 4-30 to 4-39. The Mobility Plan is discussed in additional detail in Specific Plan Section 3.3, Mobility Plan, and in Specific Plan Appendix Section 2-C, Mobility Plan.[2733] The MMRP requires, among other mandatory actions, the implementation of the Mobility Plan, including (a) the provision of an extensive system of sidewalks, greenway trails, community trails, and two transit hubs to serve as alternative means of transportation on the Project site, (b) the creation and operation of a Transportation Management Association (TMA) to implement transportation improvements and programs, including transit and on-demand services, and implementation of Transportation Demand Management (TDM) measures to reduce dependence on the automobile, provide for a more efficient use of transportation resources among Project occupants, and reduce pollutant emissions, (c) construction of sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas, (d) small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations, (e) pedestrian environments incorporated with public streets, (f) parking behind buildings to encourage walking in retail areas along street frontage, and (f) parks within 0.25 mile of 80 percent of all residential units. MM 10-25 also requires that the TMA implement transit and transportation measures to ensure that (1) a minimum of 30 percent of total daily internal on-site trips, and (2) a minimum of 20 percent of peak hour external commuting trips are completed by using transit modes other than single-occupancy automobiles.

The Draft EIR and Specific Plan discuss several Project design features and TDM measures that would reduce incentives to make trips using single occupancy automobiles and encourage the use of alternative modes of transportation. These measures include compact Project designs organized in villages where residential units, commercial facilities,

[2732] Final EIR Appendix 2.0-C.Rev
[2733] DRP 2017, Appendix 5.10-A

employment generating land uses and other Project facilities are in close proximity and linked with bicycle and walking trails and the provision of transit centers, parking policies and local transportation systems that encourage non-automotive trips, and transit facilities and linkages with transit service providers to provide Project area residents and employees with multiple modes of accessibility for internal and external trips. The MMRP requires County verification of compliance with the Specific Plan Mobility Plan, including the internal and external non-single occupancy automotive trip objectives in MM 10-25, with each tentative map application (see references to the "Action Required," "When Monitoring to Occur," "Responsible Agency or Party," and "Monitoring Agency or Party" in the columns applicable to Final EIR MMs 10-25 and 10-26 in Draft EIR Appendix 2.0-A. MM10-2 also requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County.

As discussed in Specific Plan Appendix 2-C, the Project Mobility Plan requires the formation and funding of a TMA to promote, manage, and monitor transit and mobility services and infrastructure prior to the issuance of the first occupancy permit for the Project. The TMA will be responsible for monitoring the form of Project residential and employment travel, or transit modes and ensuring that the Project meets its mobility objectives. Table 2-C-1 lists TDM and auto demand reduction measures that have been documented and evaluated by planning and research groups that will be implemented by the TMA. Table 2-A-1 in Specific Plan Appendix 2-A lists the Project's Green Development Plan implementation measures, which include verification to the County that, prior 5,000th residential occupancy permit for the Project, the TMA has contracted with one or more public transportation providers to implement systems consisting of low-emissions buses, special charter operations, on-demand car or van services, or other types of transit to increase public transit ridership and reduce vehicle trips and facilitate community connectivity.

Section 4 of Specific Plan Appendix 2-C requires that the TMA adaptively manage compliance with the internal and external mobility performance standards in the MMRP by conducting transit mode surveys and other appropriate monitoring activities. Additional TDM measures will implemented by the TMA as may be required to achieve the Mobility Plan goals, including the potential use of emerging transportation technologies listed in Table 2-C-2. Transit mode surveys using standard methodologies for assessing trip counts and transit and alternative transportation mode use, and other appropriate monitoring activities will be conducted to verify the effectiveness of the TDM measures. The monitoring and adaptive management process will be a continuing obligation of the TMA to verify compliance with the MMRP internal and external mobility performance standards over time.

As discussed in more detail in response to Comment F.8-11, the tentative map approval process serves as the implementing mechanism for Project land uses, and all tentative map land uses must be consistent with the Centennial Specific Plan.[2734] Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site

[2734] Final EIR Appendix 4.0-A.Rev

plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to this Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code.

In summary, the Project trip lengths derived from the North County Sub-Area Model are generally consistent with the trips lengths and internal and external trip activity typical of communities that are located relatively far from pther locations. The model does not account for traffic reduction measures that must be implemented by the Project under the MMRP and confirmed by the County during the tentative map approval process. Contrary to the comment, there is nothing extraordinary about the Project's trip length, and there is no support for the assertions in the comment to the contrary. The Project will implement state of the art transit and transporation demand mangement measures to further reduce the projected levels of travel using single occupancy vehicles.

Response to Comment F.8-416:

Comment noted. The formation, operation, function and implementation of the Project Mobility Plan is discussed in response to Comment F.8-418 and in more detail in responses to Comments F.8-15 and F.8-16.

Response to Comment F.8-417:

Comment noted. The formation, operation, function and implementation of the Project Mobility Plan is discussed in response to Comment F.8-418 and in more detail in responses to Comments F.8-15 and F.8-16.

Response to Comment F.8-418:

The Project's transportation management obligations, including transit, are discussed in Specific Plan Section 4.5.5, Mobility Plan and on Draft EIR pages 4-30 to 4-39. The Mobility Plan is discussed in additional detail in Specific Plan Section 3.3, Mobility Plan, and in Specific Plan Appendix Section 2-C, Mobility Plan.[2735] The Mitigation Monitoring and Reporting Program (MMRP) requires, among other mandatory actions, the implementation of the Mobility Plan in the Specific Plan (see Final EIR MMs 10-25 and 10-26).[2736] The Mobility Plan includes, among other measures, (a) the provision of an extensive system of sidewalks, greenway trails, community trails, and two transit hubs to serve as alternative means of transportation on the Project site, (b) the creation and operation of a Transportation Management Association (TMA) to implement transportation improvements and programs, including transit and on-demand services, and implementation of Transportation Demand Management (TDM) measures to reduce dependence on the automobile, provide for a more efficient use of transportation resources among Project occupants, and reduce pollutant

[2735] DRP 2017, Appendix 5.10-A
[2736] Final EIR Appendix 2.0-C.Rev

emissions, (c) construction of sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas, (d) small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations, (e) pedestrian environments incorporated with public streets, (f) parking behind buildings to encourage walking in retail areas along street frontage, and (f) parks within 0.25 mile of 80 percent of all residential units. MM 10-25 also requires that the TMA implement transit and transportation measures to ensure that (1) a minimum of 30 percent of total daily internal on-site trips, and (2) a minimum of 20 percent of peak hour external commuting trips are completed by using transit modes other than single-occupancy automobiles.

The Draft EIR and Specific Plan discuss several Project design features and TDM measures that would reduce incentives to make trips using single occupancy automobiles and encourage the use of alternative modes of transportation. These measures include compact Project designs organized in villages where residential units, commercial facilities, employment generating land uses and other Project facilities are in close proximity and linked with bicycle and walking trails and the provision of transit centers, parking policies and local transportation systems that encourage non-automotive trips, and transit facilities and linkages with transit service providers to provide Project area residents and employees with multiple modes of accessibility for internal and external trips. The MMRP requires County verification of compliance with the Specific Plan Mobility Plan, including the internal and external non-single occupancy automotive trip objectives in MM 10-25, with each tentative map application (see references to the "Action Required," "When Monitoring to Occur," "Responsible Agency or Party," and "Monitoring Agency or Party in the columns applicable to Final EIR MMs 10-25 and 10-26 in Draft EIR Appendix 2.0-A. MM 10-2 also requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County.

As discussed in Specific Plan Appendix 2-C, the Project Mobility Plan requires the formation and funding of a TMA to promote, manage, and monitor transit and mobility services and infrastructure prior to the issuance of the first occupancy permit for the Project. The TMA will be responsible for monitoring the form of Project residential and employment travel, or transit modes and ensuring that the Project meets its mobility objectives. Table 2-C-1 lists TDM and auto demand reduction measures that have been documented and evaluated by planning and research groups that will be implemented by the TMA. Table 2-A-1 in Specific Plan Appendix 2-A lists the Project's Green Development Plan implementation measures, which include verification to the County that, prior to the 5,000th residential occupancy permit for the Project, the TMA has contracted with one or more public transportation providers to implement systems consisting of low-emissions buses, special charter operations, on-demand car or van services, or other types of transit to increase public transit ridership and reduce vehicle trips and facilitate community connectivity.

Section 4 of Specific Plan Appendix 2-C requires that the TMA adaptively manage compliance with the internal and external mobility performance standards in the MMRP by conducting transit mode surveys and other appropriate monitoring activities. Additional TDM measures

will be implemented by the TMA as may be required to achieve the Mobility Plan goals, including the potential use of emerging transportation technologies listed in Table 2-C-2. Transit mode surveys using standard methodologies for assessing trip counts and transit and alternative transportation mode use, and other appropriate monitoring activities will be conducted to verify the effectiveness of the TDM measures. The monitoring and adaptive management process will be a continuing obligation of the TMA to verify compliance with the MMRP internal and external mobility performance standards over time. As discussed in more detail in response to Comment F.8-11, the tentative map approval process serves as the implementing mechanism for Project land uses, and all tentative map land uses must be consistent with the Centennial Specific Plan.[2737] Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to this Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code.

Consdequently, the amount of transit to be provided will be based on demand and in compliance with the MMRP, which in turns requires that the Project Mobility Plan be fully implemented to the satisfaction of the County during the review and approval process for each teantive tract map As demand increases, the levels of transit service will be increased to accommodate the demand. The excerpt cited in the comment refers to the minimum amount of commuter transit vehicles needed to address specific off-site impacts. The actual amount of off-site commuter transit vehicles could be significantly greater based on demand for the service and the requirements of the MMRP implementing the Project Mobility Plan. Additional information concerning Project transit requirements is provided in responses to Comments F.8-15 and F.8-16.

Response to Comment F.8-419:

The Project's transportation management obligations, including transit, are discussed in Section 4.5.5, Mobility Plan, and on Draft EIR pages 4-30 to 4-39. The Mobility Plan is discussed in additional detail in Specific Plan Section 3.3, Mobility Plan, and in Specific Plan Appendix Section 2-C, Mobility Plan.[2738] The Mitigation Monitoring and Reporting Program (MMRP)[2739] requires, among other mandatory actions, the implementation of the Mobility Plan in the Specific Plan (see Final EIR MMs 10-25 and 10-26). The Mobility Plan includes, among other measures, (a) the provision of an extensive system of sidewalks, greenway trails, community trails, and two transit hubs to serve as alternative means of transportation on the Project site, (b) the creation and operation of a Transportation Management Association (TMA) to implement transportation improvements and programs, including transit and on-demand services, and implementation of Transportation Demand Management (TDM) measures to reduce dependence on the automobile, provide for a more

[2737] Final EIR Appendix 4.0-A.Rev
[2738] DRP 2017, Appendix 5.10-A
[2739] Final EIR Appendix 2.0-C.Rev

efficient use of transportation resources among Project occupants, and reduce pollutant emissions, (c) construction of sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas, (d) small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other destinations, (e) pedestrian environments incorporated with public streets, (f) parking behind buildings to encourage walking in retail areas along street frontage, and (f) parks within 0.25 mile of 80 percent of all residential units. MM 10-25 also requires that the TMA implement transit and transportation measures to ensure that (1) a minimum of 30 percent of total daily internal on-site trips, and (2) a minimum of 20 percent of peak hour external commuting trips are completed by using transit modes other than single-occupancy automobiles.

The Draft EIR and Specific Plan discuss several Project design features and TDM measures that would reduce incentives to make trips using single occupancy automobiles and encourage the use of alternative modes of transportation. These measures include compact Project designs organized in villages where residential units, commercial facilities, employment generating land uses and other Project facilities are in close proximity and linked with bicycle and walking trails and the provision of transit centers, parking policies and local transportation systems that encourage non-automotive trips, and transit facilities and linkages with transit service providers to provide Project area residents and employees with multiple modes of accessibility for internal and external trips. The MMRP requires County verification of compliance with the Specific Plan Mobility Plan, including the internal and external non-single occupancy automotive trip objectives in MM 10-25, with each tentative map application (see references to the "Action Required," "When Monitoring to Occur," "Responsible Agency or Party," and "Monitoring Agency or Party" in the columns applicable to Final EIR MM 10-25 and 10-26 in Draft EIR Appendix 2.0-A. MM 10-2 also requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County.

As discussed in Specific Plan Appendix 2-C, the Project Mobility Plan requires the formation and funding of a TMA to promote, manage, and monitor transit and mobility services and infrastructure prior to the issuance of the first occupancy permit for the Project. The TMA will be responsible for monitoring the form of Project residential and employment travel, or transit modes and ensuring that the Project meets its mobility objectives. Table 2-C-1 lists TDM and auto demand reduction measures that have been documented and evaluated by planning and research groups that will be implemented by the TMA. Table 2-A-1 in Specific Plan Appendix 2-A lists the Project's Green Development Plan implementation measures, which include verification to the County that, prior to the 5,000th residential occupancy permit for the Project, the TMA has contracted with one or more public transportation providers to implement systems consisting of low-emissions buses, special charter operations, on-demand car or van services, or other types of transit to increase public transit ridership and reduce vehicle trips and facilitate community connectivity.

Section 4 of Specific Plan Appendix 2-C requires that the TMA adaptively manage compliance with the internal and external mobility performance standards in the MMRP by conducting

transit mode surveys and other appropriate monitoring activities. Additional TDM measures will implemented by the TMA as may be required to achieve the Mobility Plan goals, including the potential use of emerging transportation technologies listed in Table 2-C-2. Transit mode surveys using standard methodologies for assessing trip counts and transit and alternative transportation mode use, and other appropriate monitoring activities will be conducted to verify the effectiveness of the TDM measures. The monitoring and adaptive management process will be a continuing obligation of the TMA to verify compliance with the MMRP internal and external mobility performance standards over time. As discussed in more detail in response to Comment F.8-11, the tentative map approval process serves as the implementing mechanism for Project land uses, and all tentative map land uses must be consistent with the Centennial Specific Plan.[2740] Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to this Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code.

Consequently, the amount of transit to be provided will be based on demand and in compliance with the MMRP, which in turn requires that the Project Mobility Plan be fully implemented to the satisfaction of the County during the review and approval process for each tentative tract map. Additional information concerning Project transit requirements is provided in responses to Comments F.8-15 and F.8-16.

Response to Comment F.8-420:

The Project's transportation management obligations, including transit, are discussed in in Section 4.5.5, *Mobility Plan* and on Draft EIR pages 4-30 to 4-39. The Mobility Plan is discussed in additional detail in Specific Plan Section 3.3, Mobility Plan, and in Specific Plan Appendix Section 2-C, *Mobility Plan*.[2741] The Mitigation Monitoring and Reporting Program (MMRP) requires, among other mandatory actions, the implementation of the Mobility Plan in the Specific Plan (see Final EIR MMs 10-25 and 10-26).[2742] The Mobility Plan includes, among other measures, (a) the provision of an extensive system of sidewalks, greenway trails, community trails, and two transit hubs to serve as alternative means of transportation on the Project site, (b) the creation and operation of a Transportation Management Association (TMA) to implement transportation improvements and programs, including transit and on-demand services, and implementation of Transportation Demand Management (TDM) measures to reduce dependence on the automobile, provide for a more efficient use of transportation resources among Project occupants, and reduce pollutant emissions, (c) construction of sidewalks, greenway trails, and community trails that link residential, schools, shopping, and employment areas, (d) small- to medium-sized streets and blocks that allow for shorter walking distances to retail, parks, schools, and other

[2740] Final EIR Appendix 4.0-A.Rev
[2741] DRP 2017, Appendix 5.10-A
[2742] Final EIR Appendix 2.0-C.Rev

destinations, (e) pedestrian environments incorporated with public streets, (f) parking behind buildings to encourage walking in retail areas along street frontage, and (f) parks within 0.25 mile of 80 percent of all residential units. MM 10-25 also requires that the TMA implement transit and transportation measures to ensure that (1) a minimum of 30 percent of total daily internal on-site trips, and (2) a minimum of 20 percent of peak hour external commuting trips are completed by using transit modes other than single-occupancy automobiles.

The Draft EIR and Specific Plan discuss several Project design features and TDM measures that would reduce incentives to make trips using single occupancy automobiles and encourage the use of alternative modes of transportation. These measures include compact Project designs organized in villages where residential units, commercial facilities, employment generating land uses and other Project facilities are in close proximity and linked with bicycle and walking trails and the provision of transit centers, parking policies and local transportation systems that encourage non-automotive trips, and transit facilities and linkages with transit service providers to provide Project area residents and employees with multiple modes of accessibility for internal and external trips. The MMRP requires County verification of compliance with the Specific Plan Mobility Plan, including the internal and external non-single occupancy automotive trip objectives in MM 10-25, with each tentative map application (see references to the "Action Required," "When Monitoring to Occur," "Responsible Agency or Party," and "Monitoring Agency or Party" in the columns applicable to Final EIR MMs 10-25 and 10-26 in Final EIR Appendix 2.0-A.Rev. MM 10-2 also requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County.

As discussed in Specific Plan Appendix 2-C, the Project Mobility Plan requires the formation and funding of a TMA to promote, manage, and monitor transit and mobility services and infrastructure prior to the issuance of the first occupancy permit for the Project. The TMA will be responsible for monitoring the form of Project residential and employment travel, or transit modes and ensuring that the Project meets its mobility objectives. Table 2-C-1 lists TDM and auto demand reduction measures that have been documented and evaluated by planning and research groups that will be implemented by the TMA. Table 2-A-1 in Specific Plan Appendix 2-A lists the Project's Green Development Plan implementation measures, which include verification to the County that, prior to the 5,000th residential occupancy permit for the Project, the TMA has contracted with one or more public transportation providers to implement systems consisting of low-emissions buses, special charter operations, on-demand car or van services, or other types of transit to increase public transit ridership and reduce vehicle trips and facilitate community connectivity.

Section 4 of Specific Plan Appendix 2-C requires that the TMA adaptively manage compliance with the internal and external mobility performance standards in the MMRP by conducting transit mode surveys and other appropriate monitoring activities. Additional TDM measures will implemented by the TMA as may be required to achieve the Mobility Plan goals, including the potential use of emerging transportation technologies listed in Table 2-C-2. Transit mode surveys using standard methodologies for assessing trip counts and transit

and alternative transportation mode use, and other appropriate monitoring activities will be conducted to verify the effectiveness of the TDM measures. The monitoring and adaptive management process will be a continuing obligation of the TMA to verify compliance with the MMRP internal and external mobility performance standards over time. As discussed in more detail in response to Comment F.8-11, the tentative map approval process serves as the implementing mechanism for Project land uses, and all tentative map land uses must be consistent with the Centennial Specific Plan (Final EIR Appendix 4.0-A.Rev). Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code. All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to this Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code.

Consequently, the amount of transit to be provided will be based on demand and in compliance with the MMRP, which in turns requires that the Project Mobility Plan be fully implemented to the satisfaction of the County during the review and approval process for each tentative tract map. Additional information concerning Project transit requirements is provided in responses to Comments F.8-15 and F.8-16.

Response to Comment F.8-421:

For the reasons discussed in the responses to comments concerning traffic issues in comment letter F.8, including the response to Appendix A of letter F.8 (responses to Comments F.8-354 to F.8-422) the Draft EIR and the Supplemental Traffic Study (STS) prepared to incorporate the Caltrans preferred Alternative 2 improvements for the SR-138[2743] provide a throrough and valid analysis of potential Project traffic and transportation impacts that fully complies with all CEQA requirements.

Response to Comment F.8-422:

Comment noted.

Response to Comment F.8-423:

As noted in response to Comment F.8-365, the SR-126 traffic counts used for analysis were collected in 2015. The unemployment rates shown in Comment F.8-423 for prior years are not applicable to the methodology utilized to obtain the SR-126 traffic counts used in the analysis and do not affect the results in any manner.

[2743] DRP 2017, Appendix 5.10-C

Response to Comment F.8-424:

As noted in response to Comment F.8-375, in response to a request by Caltrans, a Supplemental Traffic Study (STS) was prepared to incorporate the Caltrans' preferred alternative for SR-138 identified in the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Draft EIR. The STS includes Highway Capacity Manual volume-density calculations utilizing the measures of effectiveness listed in Caltrans Guide for the Preparation of Traffic Impact Studies cited in Comment F.8-424.

Response to Comment F.8-425:

As noted in response to Comment F.8-400, the comment references a conceptual study prepared by Caltrans (2013 I-5 Transportation Concept Report) ("I-5 TCR") that is inconsistent with more recent analyses published by Caltrans and with historical traffic counts provided by Caltrans. As shown in response to Comment F.8-400, the I-5 TCR assumes that from 2011 to 2035, I-5 AADT traffic volumes will increase by 5.1 percent south and north of the SR-99 split, and north of SR-138. As discussed in more detail in response to Comment F.8-17, in June 2017 Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR"). As summarized in response to Comment F.8-400, the NW SR-138 FEIR provides a more recent analysis of projected traffic growth on these segments, which range from 2.6 percent to approximately 3 percent per year. The AADT for I-5 in 2040 projected in the NW SR-138 FEIR north of SR-138 is consistent with the 2035 AADT reported in the Draft EIR for this same location and is also consistent with the volume shown in the Draft EIR for south of the I-5/SR 99 split. Response to Comment F.8-400 also documents that, over the past 10 years, Caltrans traffic counts show that AADT on the segments of I-5 north and south of the SR 99 interchange have increased at an average annual rate of just 0.6 percent and 1.5 percent, respectively, while AADT levels have actually declined north and south of SR-138. Consequently, the 2013 I-5 TCR is not consistent with the more recent projections provided by Caltrans in the 2017 NW SR-138 FEIR and is not supported by Caltrans' traffic counts at the I-5/SR-99 split and at SR-138. Finally, as discussed in response to Comment F.8-400, in July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the preferred SR-138 Alternative 2 ("Alt2") facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using Highway Capacity Manual (HCM) methodology utilized in the NW SR-138 FEIR. The STS includes an analysis of the I-5 north and south of SR-99 and north and south of SR-138 under existing plus Project and cumulative plus Project conditions during the peak AM and PM hours that is consistent with the most current Caltrans projections and traffic count information.[2744] The STS also demonstrates that the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

[2744] Final EIR Appendix 5.10-C, Table A-5

Response to Comment F.8-426:

As noted in responses to Comments F.8-404 to F.8-409, due to a typographical error, the ADT volume shown for the I-5 segment Vista Del Lago Road to Templin Highway and also the segment from Templin Highway to Lake Hughes Road for cumulative conditions without the Project should be 110,000 and 111,000, respectively. Accordingly, the net increment of Project traffic should be 19,000 ADT at each location. As shown in response to Comment F.8-404, the corrected values for the cumulative conditions without the Project at these locations results in a linear change from 22,000 to 11,000 ADT between SR-138 and Smoky Bear Road and Hasley Canyon and SR 126. Minimal change occurs in the segments between Smokey Bear Road and Parker Road due to a lack of development in those areas. ADT volumes are presented in the traffic study[2745] for informational purposes. The actual impact analysis is based on peak hour trips which are not affected by the ADT information in the study. As shown in the Project Traffic Study, Table 4-6 Freeway Volume & Capacity Summary – Cumulative (2035 & 2040) Conditions, the traffic study accurately depicts the net change in peak hour traffic forecasts between conditions with and without the Project.[2746] The corrections to the ADT volumes in the table below do not affect the results of the impact analysis. In addition, as discussed in more detail in response to Comment F.8-17, in June 2017, during the comment period for the Draft EIR, Caltrans issued the Northwest State Route 138 Corridor Improvement Project Final EIR/EIS ("NW SR-138 FEIR") and identified Alternative 2 (Expressway/Highway) ("Alt 2") as the preferred alternative for the SR-138 improvements. In July 2017 Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 facilities to be consistent with the NW SR-138 FEIR. In response, a Supplemental Traffic Study (STS) was prepared to incorporate Alt 2 with the Project traffic analysis. The STS is attached as Appendix 5.10-C of the Final EIR. As in the Draft EIR, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts are evaluated using the HCM methodology utilized in the NW SR-138 FEIR for peak AM and PM hours and are not affected by the ADT corrections at the two freeway segments discussed above. The STS also demonstrates that, using the HCM methodology, the Project will not result in any new or more severe significant impacts to applicable highway segments, intersections and ramps than considered in the Draft EIR.

[2745] DRP 2017, Appendix 5.10-A
[2746] *Ibid.*

Exhibits B and C to Letter F.8

Response to Exhibit B – Vollmar 2004. 2003-2004 Botanical Survey Report Centennial SP:

Note that Exhibit B is tied to Comments F.8-118, F.8-119, and F.8-120; please see responses to Comments F.8-118, F.8-119, and F.8-120. The comments and the document provided on the CD, *Vollmar 2004. 2003-2004 Botanical Survey Report Centennial SP,* are acknowledged and discussed within the responses mentioned above.

Response to Exhibit C – SEA Overlay:

Note that Exhibit C is tied to Comments F.8-114, F.8-170, and F.8-171; please see responses to Comments F.8-114, F.8-170, and F.8-171. The comments and the map provided on the CD, *SEA Overlay,* are acknowledged and discussed within the responses mentioned above.

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Protecting and restoring natural ecosystems and imperiled species through Science, education, policy, and environmental law

Via USPS

October 5, 2017

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

Re: Additional Comments on the Centennial Project Draft Environmental Impact Report

Dear Mr. Sackett:

These additional comments are submitted on behalf of the Center for Biological Diversity ("Center"), the Center for Food Safety and the California Native Plant Society regarding the Draft Environmental Impact Report ("DEIR") for the proposed Centennial Project ("Project"). F.9-1

In our comments dated August 16, 2017, we referenced an Administrative Draft of the Antelope Valley Regional Conservation Investment Strategy (at pg. 44). That document includes important information on the biological and conservation values of the proposed Centennial development area in the context of the larger connectivity and conservation needed in the west end of the Antelope Valley. Because the County is involved with the Antelope Valley Regional Conservation Investment Strategy, we did not previously submit that document. Subsequently, we have become aware that the Antelope Valley Regional Conservation Investment Strategy is removing the Centennial area from the planning effort at the request of Tejon Ranch[1]. However, the biological resources and conservation modeling of the Centennial area remain a valid and informative source of information for the Centennial area. The County needs to consider these data and information in the ongoing environmental review. For that reason we submit the Administrative Draft of the Antelope Valley Regional Conservation Investment Strategy. It is a large 28MB file, so it is on the included CD. F.9-2

Please feel free to contact us with any questions.

Respectfully submitted,

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1 http://smmc.ca.gov/pdf/attachment4730_Attach%201.pdf

Response to Comment Letter F.9
Center for Biological Diversity
October 5, 2017

Response to Comment F.9-1:

This is an introductory comment explaining the identity of the Commenters, who have previously submitted comment letters.

Response to Comment F.9-2:

The Commenter's submittal, via CD, of the June 2017 Administrative Draft of the Antelope Valley Regional Conservation Investment Strategy (June Admin Draft) is noted. The referenced CD was not enclosed with the October 5 letter; the letter was submitted more than two months following the close of the public comment period on the Draft EIR. The CD was received by the County in a separate transmittal approximately one week later.

The Regional Conservation Investment Strategy (RCIS) program referenced by the Commenter is a pilot program authorized by Assembly Bill 2087 (2016).

Background on RCIS Program. The Legislature expressly described the purpose of this program in Section 1850 of the California Fish and Game Code, which provides in pertinent part:

> It is . . . the policy of the state to encourage voluntary conservation mechanisms to **identify and implement advance mitigation actions** that do all of the following:
>
> (1) Can be used to compensate for project impacts, including, but not limited to, infrastructure and renewable energy projects, more efficiently.
>
> (2) Are effective ecologically.
>
> (3) Will help to conserve regionally important biological and other energy resources.
>
> It is . . . the intent of the Legislature to create nonregulatory mechanisms to guide investments in conservation, infrastructure, and compensatory mitigation for impacts to natural resources, including impacts to threatened and endangered species, other sensitive species, natural communities, ecological processes, and connectivity.
>
> In enacting this chapter, **it is not the intent of the Legislature to regulate the use of land, establish land use designations, or to affect, limit, or restrict the land use authority of any public agency**.
>
> (Fish & Game Code Section 1850(c)-(e), emphasis added.)

In Guidance issued by the California Department of Fish and Wildlife (CDFW), the program's purpose was summarized, in its entirety, as follows:

- Achieve more **strategic, effective conservation**
- Promote resiliency to climate change & other pressures
- Support infrastructure & other projects with **efficient mitigation delivery**

(RCIS Program Guidelines Public Presentation,[2747] emphasis added)

The RCIS legislation mandates the contents of a RCIS plan, which includes but is not limited to the requirement that the RCIS plan "**account for reasonably foreseeable development** of major infrastructure facilities, including, but not limited to, renewable energy and housing." The RCIS plan must also "include provisions **ensuring that the strategy will be in compliance with all applicable** state and **local requirements** and does not preempt the authority of local agencies to implement infrastructure and urban development in local general plans" (emphasis added).[2748] The RCIS plan must be developed "in consultation with local agencies that have land use authority."[2749] A draft RCIS plan must be submitted to CDFW for initial review, a revised version that adequately addresses CDFW's comments must then be prepared and made available for public review, and following public review the final version must be submitted to and may be approved by CDFW.[2750]

Antelope Valley RCIS Pilot. The process to prepare the Antelope Valley RCIS pilot (AV RCIS) began in 2016 and resulted in the publication of an "administrative draft" AV RCIS in June of 2017 (June Admin Draft).

AV RCIS Created By Private Consultants Funded by Private Foundation With No Public Agency Applicant. Although the RCIS legislation requires that an RCIS may be proposed by the department or any other public agency, and shall be developed in consultation with local agencies that have land use authority within the geographic area of the regional investment strategy,"[2751] the June Admin Draft did not have a public agency applicant or sponsor. Instead, although the June Admin Draft states that the process was begun in March of 2016 by the "Desert and Mountains Conservation Authority (DMCA) Steering Committee" and that the DMCA is the "RCIS Applicant,"[2752] the DMCA Board declined to take action to authorize the RCIS process in both 2016 and 2017, did not appoint Steering Committee members or Advisory Board members, and was itself "invited" to participate on the Steering Committee by an unidentified "working group" in June of 2016. [2753]

[2747] RCIS Program Guidelines Public Presentation (June 21, 2017), PDF, available at https://www.wildlife.ca.gov/Conservation/Planning/Regional-Conservation.
[2748] Fish & Game (F&G) Code section 1853(c)(7-8)
[2749] F&G Code section 1853(e)
[2750] F&G Code, Section 1854
[2751] F&G Code section 1552(a)
[2752] June Admin Draft 1-4
[2753] The DMCA Board meeting in March of 2016 was cancelled, in June of 2016 the Board received a "briefing" from the Deputy Director of a different agency, the Santa Monica Mountains Conservancy (SMMC) about a "working group"

Los Angeles County accepted a small ($18,500) grant from a private nonprofit foundation to help fund staff participation in the RCIS pilot for the Antelope Valley area generally, but no specific pilot plan area or parameters were proposed or agreed to by the County as of its acceptance of the grant. The June Admin Draft was accordingly produced by private consultants paid from a private foundation, apparently managed by a Sacramento law firm called the Resources Law Group, with no public agency applicant or approval. The private consultants formed a "Steering Committee" and an "Advisory Committee", without any public agency control or oversight. There is no record of any vote taken by either committee in determining what lands were to be included in the AV RCIS, what criteria and methodology was to be used to identify potential conservation and mitigation lands, or what criteria and methodology was to be used to assess the biological resource values for selected lands.

The County first learned in the summer of 2017 that the boundaries of the RCIS pilot project included the only three locations in Antelope Valley designated as Economic Opportunity Areas (EOAs) by the Los Angeles Board of Supervisors, in a unanimous vote adopting the Antelope Valley Area Plan (AVAP). The Project site is located in one of these designated growth areas, in the West EOA. The AVAP preserves the vast majority of County lands in Antelope Valley, which are slated for continued open space uses rather than development.

County representatives did not agree that the three EOAs were appropriate for inclusion in the AV RCIS pilot program, since the purpose of this program was to identify compensatory mitigation and conservation lands, and the AV RCIS must be "in compliance with all applicable . . . local requirements," which includes the AVAP Plan. After the County's request that the AV RCIS exclude the EOAs was first verbally rejected by the private consultants working under contract to the Resources Law Group, the County explained its position more formally by the County in a letter to other Steering Committee members:

> The Antelope Valley Area Plan ("AVAP"), adopted as a community-based plan for the Antelope Valley area and a component of the General Plan, relies on a Rural Preservation Strategy to meet the goals and objectives of the General Plan, by balancing priorities for environmental conservation and preservation against the need for development. As part of the AVAP Rural Preservation Strategy, three Economic Opportunity Areas ("EOAs") were adopted. . . . The AVAP Rural Preservation Strategy achieves this balance of preservation and development by concentrating development within the EOAs to preserve the open and rural areas outside the EOAs. Areas mapped as EOAs are designated by the County as priority areas for development to occur.
>
> In reviewing the administrative draft of the AVRCIS, it has become apparent that the AVRCIS has chosen to prioritize some of the EOAs for conservation. The County's adopted policy direction for the EOAs thus conflicts with the AVRCIS's designated that prioritized the same areas for conservation. This

which has "invited" DMCA to be a member of the steering committee, and the approved minutes of the June Board meeting indicate that no action was taken by the Board on participating in or approving any role for the DMCA in the Antelope Valley RCIS Pilot (*see* http://dmca.ca.gov/agenda_archive.asp for March, June and September 2016 Board meetings).

> designation in the AVRCIS also conflicts with the regional conservation investment strategy legislation, which is to provide guidance for identification of areas for compensatory mitigation and must consider local land use planning designations and foreseeable developments.
>
> To correct these inconsistencies the priority conservation designation in the EOAs under the AVRCIS must be amended to exclude the EOAs. By their function, EOAs cannot be considered areas of conservation priority.

The County responded by again restating that the EOAs be excluded from the RCIS.[2754]

Also in the summer of 2017, shortly after release of the Draft EIR for the Centennial project, Tejon Ranchcorp representatives first became aware that the AV RCIS included the Centennial development project site notwithstanding earlier assurances in writing by the AVAP lead consultant, Terry Watt, that the site had been excluded given that it was slated for development and not conservation under both the Ranch-Wide Agreement and the AVAP.[2755] Although several signatories of the Ranch-Wide Agreement, like the County, had also initially agreed to participate as members of the private and non-governmentally sanctioned committees set up by the consultants driving the AV Plan's preparation (i.e., the Steering Committee and the Advisory Committee for the AV RCIS), representatives from these organizations, including the Sierra Club (Steering Committee) and Audubon California, Natural Resources Defense Council, Endangered Habitats League (Advisory Committee), later resigned from these "committees" consistent with the scientific judgement about the biological integrity and value created through the preservation of 90 percent of the Ranch, and the limited development of only 10 percent of the Ranch, under the Ranch-Wide Agreement.[2756]

It is also noteworthy that commenter Center for Biological Diversity (CBD) serves as a member of the Advisory Committee. Center for Biological Diversity was an initial participant in the Ranch-Wide Agreement negotiations but resigned and has since pursued lawsuits against Tejon Ranch as well as Los Angeles County attempting to block implementation of the development projects on the remaining 10 percent of Tejon Ranch lands not required to be conserved in perpetuity, including four development project sites in Kern County but only one – the Centennial Project site - located within Los Angeles County. (Please also refer to response to Comment F.8-229 for further information about the Commenter's lawsuit challenge to the AVAP.) Further, in the *same timeframe* that Center for Biological Diversity was participating as a member of the AV RCIS's Advisory Committee to develop the draft AV RCIS, it took the express position in communications with Tejon Ranch on litigation pending in Kern County that it could not in *any instance* agree to the development of the proposed Centennial Project. Commenter Center for Biological Diversity (CBD) received AV RCIS Advisory Committee member status, granted by the AV RCIS's private consultants and funders. CBD's avowed opposition to any development on Tejon Ranch – they have called for

[2754] County of Los Angeles letter to AV RCIS Steering Committee, August 10, 2017

[2755] Email correspondence, T. Watt, 7/7/16, and ICF memorandum July 8, 2016

[2756] The Steering Committee and Advisory Committee membership roster as of June 2017 is included in section 6.4 and 6.5 of the administrative draft AVAP Plan (p. 6-2 to 6.3)

the entirety of the Ranch to become a new national park, and have repeatedly filed lawsuits against Ranch development projects - thereby created a clear and ongoing opportunity for CBD to bias the scope and content of the AV RCIS – including the decision by the AV RCIS funders, consultants and advocates to abruptly reverse their earlier written decisions to exclude Tejon Ranch and the Project site from the AV RCIS.

It is noteworthy that the June 2017 administrative draft AV RCIS[2757] submitted by the Commenter in a later letter (see response to Comment F.9-2) is incorrectly identified as being "prepared for" the Desert Mountains Conservation Authority (DMCA) by the Antelope Valley Steering Committee. At the time of this comment, that statement is inaccurate. The DMCA had taken no action to serve as the applicant for the AV RCIS at the time the Commenter submitted its initial comment letter and did not do so until September 13, 2017. The individual contact is Paul Edelman, who serves as the Deputy Director of the Santa Monica Mountains Conservancy (SMMC). (The SMMC's opposition to the Centennial project is noted in its separate comment letter on the Draft EIR, addressed separately herein in response to the SMMC comments.) SMMC is a member of the joint powers agency that comprises the DMCA; Mr. Edelman is also identified as the sole DMCA representative on the Steering Committee.[2758]

As initially noted above, it was almost four months after completion of the June Admin Draft, and more than a month after the "Steering Committee" received the County's letter, that the unelected governing board of the DMCA actually met to consider a resolution "authorizing both public agency sponsorship and submission" of the AV RCIS to the CDFW.[2759] This was the first and only public agency action taken on this pilot program, notwithstanding the fact that the prior 18 months private consultants, and entities such as the Commenter serving on governance "steering" and "advisory" committees appointed by the private consultants, had unilaterally (and without the "public agency" status required by the RCIS legislation) designated themselves as the decision makers in developing the AV RCIS. These private consultants made various decisions about how the AV RCIS should be developed and what it should include, and about when or whether notice, consultation and/or concurrence should be sought from any public agency, landowner, or the public generally. (For example, other than the consultation between Tejon and the lead AV RCIS consultant, who also formerly served as a Tejon Ranch consultant, there is no indication of any AV RCIS notice or comment process with state or local agency landowners, or private landowners.)

In connection with DMCA ultimately taking the role as "applicant" of the AV RCIS on September 13, 2017, it is notable that the record from the DMCA meeting contains statements that the AV RCIS was being intentionally prepared in a way that was meant to dissuade and circumvent public participation. For instance, during the September DMCA hearing, the SMMC Deputy Director and DMCA staff made the following statements:

- The AV RCIS is a "private document moving through" the approval process.

[2757] June Admin Draft
[2758] *Id.*, p. C-2
[2759] DMCA Agenda, Resolution and Staff Report, September 13, 2017

- The absence of transparency, notice and accountability is intentional: "You haven't seen the final draft and people preparing it don't want it to go public until it goes to [C]DFW" – and the Steering Committee had concluded it was better have the process remain "closed."
- The exclusion of landowner participants in the Steering Committee was likewise intentional because the "main goal is conservation priorities, not landowner priorities."

Given the Commenter's assertion that the Centennial site should never be developed and the mitigation measures are wholly inadequate, it is also noteworthy that even in the absence of giving Tejon Ranch any notice of or opportunity to comment on the DMCA's Board action on the AV RCIS, DMCA staff advised its Board that the Centennial project had the mitigation land it needed on Tejon Ranch. At the September meeting, a DMCA Board member questioned whether DMCA could be liable to Tejon Ranch given that the June Admin Draft identified the Centennial site as a conservation priority under some criteria (e.g., "Figure 3-9, Least Cost Corridor Results for Large Species Connectivity for the Antelope Valley RCIS Area."). Staff stated in response: **Tejon has a "good case [for removal from the AV RCIS] in the sense they are self-contained and have mitigation land**" – but elected not to remove Tejon Ranch and instead "play this [Tejon's removal] by ear" as the process continued. In the Staff Report for this agenda item, "The [AV RCIS] planning team has not made a decision (to staff's knowledge) as of yet about Tejon Ranch's request [for removal of Tejon Ranch from the AV RCIS]."[2760]

- With respect to a Board question regarding how the RCIS program addressed compliance with local land use requirements more generally, staff stated that it would be used in commenting on future development project proposals, that it is a "pushing" document to move development to other locations, and will be controversial because "the truth hurts."
- The Board ultimately voted to be the sponsoring agency for the AV RCIS, and to allow the Board director to submit whatever final form of AV RCIS is ultimately created by its "private" authors as directed by Steering Committee members also appointed by such private authors.

Further highlighting the lack of public participation by which the AV RCIS is being created and its character as a "private study," neither the County nor Tejon Ranch were notified of the September 13, 2017 meeting. As a result, neither the County nor Tejon were therefore able to attend or participate in the discussion of either the boundaries of the RCIS study area (which did not appropriately include designated areas included in the AVAP as economic opportunity areas, including the Project site), or in the discussion of whether to include Tejon Ranch and the Project site in the RCIS at all – notwithstanding that Tejon had previously submitted a written request to be notified of any DMCA meetings at which the RCIS was discussed. During the DMCA meeting, the staff responsible for the RCIS confirmed that the RCIS was "private" and the sponsors had affirmatively elected not to provide a draft

[2760] DMCA Staff Report, Agenda Item VII, September 13, 2017

of the administrative draft plan to other parties (e.g., other jurisdictional agencies, any landowners, etc.). The staff also concluded that the exclusion of Tejon Ranch from the RCIS would not affect the adequacy of mitigation for the Project because Tejon Ranch had its own adequate mitigation land. Finally, the staff and Board members acknowledged that the RCIS would be used to comment on and advocate for different land use and conservation actions, and that the DMCA risked legal liability for interfering with the land use decisions of local agencies and landowners.

Confirming the "private" status of the AV RCIS, a week after the DMCA Board meeting, with no further input or direction from the DMCA Board itself, another member of the Steering Committee Graham Chisholm who identifies as a member of the "Conservation Strategy Group," reported that "the steering committee was comfortable with the recommendation to remove Tejon Ranch from the draft Antelope Valley Regional Conservation Investment Strategy (AVRCIS)."[2761] Still later, the attorney for the AV RCIS, Chris Beale, emailed that "[w] on the AVRCIS is currently on hold. We expect to resume work later this year or early next year. When we do, we will take the map and information into consideration when sorting out how the administrative draft EIR will be revised to exclude Tejon Ranch lands. If we have any questions, I'll follow up with you then."[2762]

Notwithstanding the correspondence cited above, the County's request that the three designated EOA development areas in the AVAP be removed from the AV RCIS was rejected by DMCA staff and the Board, notwithstanding statutory obligation to consider approved land plans. As explained in the September DMCA Board staff report: The County's request that the EOAs be removed "has been rejected because it would completely warp the scientific modeling and outright exclude critical habitat areas." The County was not notified of, or given any opportunity to comment on, staff's recommendation or the Board's acceptance of staff's recommendation.[2763]

The County has subsequently resigned in protest from the AV RCIS Steering Committee and has further elevated its objections to CDFW leadership.[2764] CDFW responded by acknowledging the County's concerns and inviting further dialogue. The "Steering Committee" response, authored by a private consultant and without apparent authorization of the DMCA (since it was not on DMCA letterhead), disagreed that the RCIS should exclude the EOAs and reneged on a prior commitment to share a revised administrative draft with the County prior to submittal to CDFW. The Steering Committee letter also quoted the RCIS statutory language stating that the RCIS had no direct regulatory effect, while not acknowledging the Steering Committee members' statements to the DMCA board of the intended effect of the RCIS to influence land use decisions or the direct use by the Commenter of the administrative draft RCIS in its opposition comments to the Draft EIR.

Commenter CBD, as an Advisory Committee member, after learning that the Steering Committee had agreed to remove Tejon Ranch (inclusive of the Centennial project site) from

[2761] Email correspondence, G. Chisholm, September 18, 2017
[2762] Email correspondence, C. Beale, October 10, 2017
[2763] DMCA Resolution, Agenda Item VII, September 13, 2017
[2764] County letters to Steering Committee and CDFW, November 6, 2017

the AV RCIS, submitted the June Admin Draft in a comment filed more than two months after the close of the public comment period on the Centennial Draft EIR. Before addressing the three specific substantive comments identified in the letter, the background information about the AV RCIS provides the context for evaluating the scientific and legal status of this June Admin Draft:

- The June Admin Draft was not prepared by or at the direction of any expert biological resources agency (or any other public agency for that matter), but was privately funded and privately managed to intentionally include as mitigation/conservation land a proposed development site at a location designated for development under the County's applicable land use plan, in contravention of the statutory requirements of the RCIS legislation.
- Committee members on committees formed by these private parties to prepare the June Admin Draft include the Commenter and SMMC - avowed opponents of the Centennial project.
- Committee members include CBD, which based on prior written correspondence between CBD and Tejon Ranch is strongly opposed to the Project, has sued the County to challenge to the AVAP EOA development areas, and brought that policy bias to the AV RCIS including reversing earlier commitments by AV RCIS staff to exclude Tejon Ranch.
- The late submittal of the June Admin Draft is noted, with substantive responses provided in response to Comment F.9-2.
- As even the DMCA staff acknowledged, Tejon Ranch is "self-contained" and has its own "mitigation land."
- Although some DCMA and Steering Committee members (other than commenters CBD and SMMC) reportedly supporting excluding the County EOAs and/or Tejon Ranch, these concerns were apparently dismissed and the final decision was left to the funders, drafters, and Centennial Project opponent SMMC – and used by Centennial Project opponent CBD as a "late hit" objection outside the extended public comment period on the Draft EIR.
- The AV RCIS is currently on indefinite hold, but Tejon Ranch – inclusive of the Centennial project site – will be excluded from the AV RCIS.

June Admin Draft Not "Best Available Science". The Commenter's opinion that the Draft EIR needs to be revised and recirculated to "incorporate the results of the RCIS process" is noted. The June Admin draft explains that a "map-based Environmental Evaluation Modeling System (EEMS)[2765] was used to generate the biological value model results." The draft report goes on to explain that "[t]he biological value model was developed interactively with stakeholder involvement, where input from stakeholders and local experts could be dynamically changed, resulting in a transparent and nimble modeling process." The draft report then directs the reader to two Appendices, F and G, for an explanation of the

[2765] Sheehan 2016

methodology used to rank the biological value of lands within the AV RCIS area.[2766] Appendix G reads in its entirety: "Description of Modeling Methodology to be provided."[2767] The missing modeling methodology was in turn used to generate the draft report's conclusions and figures about the biological resource values of the Centennial project site and other Antelope Valley lands. A detailed response cannot be provided to missing modeling methodology, which precludes any ability for the lead agency to evaluate its legitimacy.

The Draft EIR does, however, include an assessment of the three biological resource values identified by the Commenter as relevant in the June Admin Draft. With respect to the June Admin Draft's designation of the project site as a habitat core area called "Western Antelope Valley," for example, the designation encompasses nearly all of the Centennial Project site. The Draft EIR includes all biological resources, inclusive of the three species groups (desert, agriculture/grassland, and foothill/riparian) included in the June Admin Draft, were in fact studied and documented in regard to their occurrence on the Project site. Subsequent analysis reviewed the impacts of the Centennial project accordingly. The Project site in the Draft EIR, however, was not separated as distinctly named "unit" of land as was the case with the June Admin Draft; instead, the biological resource values on the Project site were considered as part of the mosaic of habitat areas in the region, which vary in quality and connectivity throughout. It should be noted that the Project region, in regard to the biological resources evaluation in the Draft EIR, did not truncate at the Los Angeles County boundary but continued northward into Kern County and up to the Tehachapi Mountains ridgeline. The June Admin Draft, however, did truncate its "Western Antelope Valley" subarea to exclude the immediately adjacent Kern County lands, which both undermines the regional biological assessment and overstates the importance of the "island" of land created by the private consultants and project opponents responsible for preparing the June Admin Draft. As such, substantially greater habitat areas occur within the region, including those preserved in open space uses such as the conserved lands in Tejon Ranch and the conserved lands for the Angeles National Forest, than is identified in the AV RCIS Area. The Project has also been designed to avoid the highest biological value portions of the site, and approximately 1/3 of the areas on the west and northwest portions of the area mapped as the in the June Admin Draft as the "Western Antelope Valley" have been avoided and preserved within the Centennial On- and Off-site Mitigation Preserve.

Similarly, the area identified as a habitat core and referred to as "Pine Canyon" contains a portion of the Project site which was studied and analyzed in detail as well. This area contains habitat applicable to all three species groups modeled by the AV RCIS including desert, agriculture/grassland, and foothill/riparian. In addition, this area was also evaluated for off-site mitigation value and is included nearly in its entirety within the Centennial On- and Off-site Mitigation Preserve. The Centennial Mitigation Preserve captures a total of 45,000+ acres within the area (inclusive of Kern County) which represents a large percentage of the general regional core habitats west of Palmdale and Lancaster even under the apparent methodology used by the June Admin Draft preparers and project opponents.

[2766] June Admin Draft, p. 3-3
[2767] June Admin Draft, App. G

Finally, the Draft EIR extensively considered the issue of the Project site's importance to wildlife movement and connectivity, as discussed in Draft EIR Section 5.7, Biological Resources (Impact 7-2). The Draft EIR concludes that as mitigated, the Project will have a less than significant impact on wildlife movement. Specifically, the Draft EIR concludes based on extensive project-level analyses conducted over two decades, that:

> Information presented in the Wildlife Movement discussion clearly identifies the foothills and highlands of the Tehachapi Mountains as the regional linkage zone, and the core area of this linkage zone is several miles to the northwest of the Project Site. As a result, the Project's indirect impacts [to wildlife movement] are not expected to reach the primary regional linkage area, and regionally connectivity is expected to be minimally impacted. The Project would not cause any regional populations of plants or animals in adjacent regions to become isolated. The Project's indirect impacts on wildlife movement are therefor considered to be less than significant.
>
> (DRP 2017, p. 5.7-170)

The June Admin Draft, although it does not include the technical methodology used to create its resource ranking maps, shows the east-west center of the Project site as a "least cost corridor" for wildlife movement, where as noted by the Commenter "the animals have the easiest time moving through the area." (Figure 3-9) However, this location is bisected by the California aqueduct, and onsite evidence shows that there is minimal to no linkage across the aqueduct in the center of the site. This wildlife connectivity example is one of numerous examples of the kind of simple but fundamental errors that occur when predicting biological information as opposed to having access to or developing the range of site-specific studies completed for the Draft EIR. Even such foundational information as the location of the Project itself is in error in the June Admin Draft, which for example omits southern and eastern site areas from Figure 2-13. Similarly, Figures 2-3 and 2-5 incorrectly maps areas of the Project site as grasslands which are known to be woodlands, and Figure 3-13 depicts as riparian locations on the site that are not riparian.

Appendix F, "Focal Species Habitat Models," consist solely of a series of 27 figures, 26 of which depict predicted species occurrence data and confirmed species occurrence data. The methodology used to create the Figures is not explained. Half of the figures show some predicted or confirmed occurrence information on the Centennial project site. The Draft EIR considered each of the 14 species for which predicted or actual occurrence data is depicted in Appendix F, but as is the case with wildlife connectivity, the June Admin Draft both understates and overstates species data given what appears to have been limited to no access to the site-specific data included in the Draft EIR that had been published earlier in the summer. Specific responses are provided below for all species for which Appendix F shows predicted occurrences on the Project site:

Appendix F Species Figures	June Admin Draft and Actual Ground-Truthed Conditions Accurately Reported in Centennial Draft EIR
F-11: California Condor	June Admin Draft predicts extensive foraging and some roosting activity on the Project site; however, condor GPS tracking data and other data reported in the Draft EIR confirm that there is very little foraging, and no roosting (DRP 2017, pp. 5.7-94, 5.7-118 through 5.7-120, and 5.7-148).
F-12: Golden Eagle	June Admin Draft shows isolated area near SR 138 as part of the "species range;" however, this species is known to occur throughout much of the region both on- and off- the Project site (DRP 2017, pp. 5.7-90, 5.7-114, and 5.7-150).
F-14: Least Bell's Vireo	June Admin Draft predicts "high occurrence" areas on Project site; however, numerous onsite surveys show extremely little usage and no evidence validates high occurrence prediction. In addition, the Project site is not within USFWS designated Critical Habitat for this species (DRP 2017, pp. 5.7-97, 5.7-122, and 5.7-148).
F-15: Loggerhead Shrike	June Admin Draft shows predicted "high occurrence" areas on the Project site and throughout much of the project region; however, the eBird and CNDDB data provided suggest a much more sparse occurrence and no evidence validates high occurrence. As discussed in the Draft EIR, shrike were detected in various areas of the Project site, but that nesting habitat is expected to be restricted to Oso Canyon and the woodland habitats at western edge of site. (DRP 2017, pp. 5.7-95, 5.7-121, and 5.7-151)
F-16: Long-Billed Curlew	June Admin Draft shows predicted "high occurrence" areas on the Project site; however, the eBird and CNDDB data provided suggest a very limited occurrence in the region. Surveys conducted for the Centennial project detected only a few migrants on-site over multiple years. Potentially suitable breeding habitat is present on the Project site, but no nesting activities have been observed (DRP 2017, pp. 5.7-95, 5.7-121, and 5.7-151).
F-18: Northern Harrier	June Admin Draft shows predicted "high occurrence" areas on the Project site and adjacent areas; however, observation data included in Appendix F does not exhibit higher use in this area relative to the balance of the RCIS area. The Draft EIR indicates that this raptor was observed using the Project site for foraging but not breeding, although potentially suitable nesting habitat is present where sufficient amounts of vegetative cover are available to protect this ground-nesting raptor (DRP 2017, pp. 5.7-93, 5.7-117, and 5.7-150).
F-19: Prairie Falcon	June Admin Draft shows predicted "high occurrence" areas on a portion of the Project site and throughout most of the valley floor portions of the RCIS area; however, the observation data provided does not support a conclusion of higher use in Project area relative to other areas of the RCIS where the species has been detected more regularly. As described in the Draft EIR, the prairie falcon was observed using the Project site for foraging but it is not expected to breed on-site. (DRP 2017, p. 5.7-103). Also note, this falcon is not considered special status for the purposes of State CEQA guidelines but was discussed in the Draft EIR as a species considered to be at risk of decline or extirpation in Los Angeles County by the Los Angeles Chapter of the Audubon Society (DRP 2017, p. 5.7-89).
F-20: Swainson's Hawk	June Admin Draft depicts "Expert Model Distribution" range of this species which appears to depict foraging during both breeding and migrating periods without any distinction between these very different periods. No explanation of the meaning of this category is provided and the lack of distinction between migrating and breeding areas is inconsistent with other species shown such as the willow flycatcher. Surveys for the Draft EIR found migrants passing by in spring, and foraging over the east end of the Project site in vicinity of the alfalfa fields, but no breeding birds were detected. The riparian habitats on the Project site are considered too sparse to provide suitable nesting habitat for this raptor (DRP 2017, pp. 5.7-93, 5.7-115, 5.7-116, 5.7-145, 5.7-148 and 5.7-149).

Appendix F Species Figures	June Admin Draft and Actual Ground-Truthed Conditions Accurately Reported in Centennial Draft EIR
F-21: Tricolored Blackbird	June Admin Draft shows predicted "high occurrence" areas on a portion of the Project site and throughout much of the RCIS area; however, the observation data provided does not support a conclusion of higher use in the Project area relative to other areas of the RCIS where the species has been detected more regularly. As described in the Draft EIR, a nesting colony was detected on-site in 2006 and 2008 using vegetation associated with a pond on the north-central edge of the Project site, but not thereafter. In 2015, large numbers were found nesting outside the Project site in vegetation surrounding Quail Lake. The Project site provides suitable foraging habitat, but very little potentially suitable nesting habitat (DRP 2017, pp. 5.7-91, 5.7-111, 5.7-112, 5.7-113, 5.7-114, 5.7-149 and 5.7-150).
F-22: Willow Flycatcher	June Admin Draft predicts several scattered "high occurrence" locations on the Project site; however, onsite surveys have confirmed that breeding is not occurring on predicted areas of the site. Migrant willow flycatchers may occur in almost any habitat and at any location in the region during spring and fall migrations, however, numerous onsite surveys show extremely little usage and no evidence validates high occurrence prediction. In addition, the Project site is not within USFWS designated Critical Habitat for this species (DRP 2017, pp. 5.7-94, 5.7-118, and 5.7-148).
F-23: American Badger	June Admin Draft predicts "high occurrence" locations on portions of the Project site and vast portions of the valley floor within the RCIS area. Although dens have been observed on-site, they have occurred in areas outside of the mapped "high occurrence" area where, in fact, no detections have occurred. Additional, the areas designated as high occurrence provide no evidence of increased suitability relative to most other areas on the site (DRP 2017, pp. 5.7-98, 5.7-126, and 5.7-153).
F-24: Desert Kit Fox	June Admin Draft predicts "high occurrence" over most of the Project site as well as adjacent areas; however, this species is not known to exist in these areas and have never been located during two decades of on-site survey work.
F-25: Mojave Ground Squirrel	June Admin Draft correctly indicates no occurrence for this species on the Project site. The Project site is west of the known range of the Mojave ground squirrel.
F-26: Mountain Lion	June Admin Draft shows isolated area near SR 138 as part of the "species range;" however, this species is known to occur throughout much of the region both on- and off- the Project site.
F-27: Tehachapi Pocket Mouse	June Admin Draft predicts "high occurrence" at Project site; however, the entirety of the Project site was assessed by a qualified biologist and determined to be unsuitable habitat for this species.

The factual errors in the June Admin Draft are typical of what would be expected to occur in a large-scale planning exercise, given the cost and time required to complete site-specific surveys. However, it is also the case that much of this work is predictive and has not been validated by, and is in fact inaccurate, based on actual site surveys. Since Appendix F, along with the missing Appendix G, served as source data for most of the biological value ranking information in the June Admin Draft, and the species mapping source data is substantially in error as applied to the Project site, there June Admin Draft does not create substantial evidence of a new or worse significant adverse biological resource impact, and accordingly recirculation of a revised Draft EIR is unwarranted.

Commenters' Views Conflict with Independent Biological Resource Expert Findings by Five State Agencies and Sierra Club, NRDC, Endangered Habitats League and Audubon California. Finally, while the June Admin Draft is more recent, the Commenters' assertion that it presents significant new information warranting recirculation must be weighed against the many independent agencies and environmental advocacy groups that have already extensively evaluated the biological resource values of Tejon Ranch in the context of the proposed development of the Centennial site. The Tejon Ranch Land Use and Conservation Agreement (Ranch-Wide Agreement or TRCRWA) is a historic example of the "voluntary conservation mechanisms" that the Legislature intended the RCIS program to encourage. Specifically, and as agreed to in Exhibit R of the TRCRWA the Secretary for the California Resources Agency, the Director of the California Department of Fish and Game, the Director of the Wildlife Conservation Board, the Director of the California State Parks Department, the Secretary for the California Environmental Protection Agency, and the Chair of the California State Water Resources Control Board:

> [W]e understand that of the approximately 270,000 acres comprising [Tejon] Ranch, the Ranch-wide Agreement would provide for the permanent preservation of at least 178,000 acres and for the option to preserve an additional 62,000 acres through the purchase of conservation easements, or potentially fee title, for an anticipated total of approximately 240,000 acres, or almost 90 percent of the total Ranch acreage. Because of the many unique factors noted above, **including the sheer magnitude of this conservation effort and the significant resource values attributed to this property**, and in viewing the 240,000 acres in the Conserved Areas in a holistic manner, **we expect that TRC [Tejon Ranchcorp, the owner of Tejon Ranch] will be allowed to use those Conserved Areas and corresponding natural resource values associated with these Conserved Areas to meet the land conservation and corresponding natural resource mitigation requirements for and the planned development** and other activities within the Developed Areas, **including** the designated planned development projects of Tejon Mountain Village, **Centennial** and Grapevine, subject to potential limitations for Conserved Areas acquired using public funds as described below.[2768]

According to the environmental advocacy group signatories to the TRCRWA, including Audubon California, the Endangered Habitats League, the Natural Resources Defense Council, the Planning and Conservation League, and the Sierra Club (collectively referred to as the "Resource Group" in the TRCRWA):

[2768] Conservation easements were acquired with public funding on the 62,000 acres referenced in Exhibit R, as described in the Draft EIR. The Draft EIR notes that pursuant the Ranch-Wide Agreement, conservation easements were purchased in March of 2011, and that three of the five conservation easement purchase areas comprising approximately 20,000 acres are proximate to the Centennial site. (DRP 2017, p. 4-45) The Draft EIR also notes that management of these areas is "subject to the conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch." (DRP 2017, p. 5.7-62)

> This Agreement was reached **after two years of careful scientific analysis** and intense negotiations between TRC, its partners and the Resource Groups. All parties believe that the Agreement provides for a far better conservation outcome than the typical project-specific permitting and protracted litigation methods most often used in development and conservation disputes. (TRCRWA, Executive Summary, 2008, emphasis added)
>
> The Parties to this Agreement desire to protect in perpetuity substantial and significant natural resource values of the 270,000-acre Tejon Ranch. These natural resource values include an extraordinary diversity of native species and vegetation communities, numerous special status plant and animal species, intact watersheds and landscaping supporting natural ecosystem functions and regionally significant habitat connectivity.
>
> The long-term conservation of Tejon Ranch has been one of the highest priorities of the Resource Organizations. . . . By comprehensively addressing the entire Tejon Ranch, this Agreement avoids fragmentation of many of the environmentally sensitive areas on Tejon Ranch.
>
> This Agreement allows TRC to pursue development plans in defined development areas without opposition from the Resource Organizations while enabling a conservancy to preserve Tejon Ranch's natural resource values for future generations."
>
> (TRCRWA, p. 1-2, emphasis added)

Given that 90 percent of Tejon Ranch was permanently conserved, and only 10 percent can be developed (inclusive of the Centennial site), the inclusion of Tejon Ranch in the initial administrative draft of the AV RCIS (submitted under separate cover by the same commenter, see Comment F.9-1) did not further the RCIS program purpose of proactively identifying future conservation and mitigation lands for future compensatory mitigation use. Tejon Ranch, inclusive of the Centennial site, was also the subject of two years of intense scientific review by the Resource Organizations as part of the TRCRWA process, and has been the subject of more than 20 years of biological resource studies as part of the Centennial Draft EIR preparation process.

G. Individuals

CENTENNIAL

at TEJON RANCH

Subject: FW: Centennial DEIR comment

From: Jack T. [mailto:jacktca@gmail.com]
Sent: Friday, May 19, 2017 6:39 PM
To: Jodie Sackett <jsackett@planning.lacounty.gov>
Subject: Centennial DEIR comment

Mr. Jodie Sackett,

I am the guy who urged you to put a "use it or lose it" clause into the Tejon Centennial equation. See my email in the 2015 comments document.

I am a middle class guy. I pay property taxes on my ranch in Neenach. I bought one of my lots from a man who was in a pickle. He owed lots of money in property tax. So he was forced to sell his property to me for cheap. Property taxes are a form of use-it-or-lose it pressure.

Let's take a look at the adjective "tentative" in the DEIR. What is the difference between a "tentative" tract and a plain old tract? Owners of empty lots in Neenach with tumbleweeds down a mile down the street in Neenach pay roughly $500-1000 per lot in property tax per year. Multiply 20,000 home lots in Centennial x $750/year and the property tax bill comes out to $15,000,000 per year. That's the difference between tentative and real tracts!

Unlike the middle class, the Tejon 1% club calls their lots "tentative" tracts and they don't have to pay premium property tax because until someone tips the scale and actually calls them real tracts then they are ranch land or farm land or just plain wilderness. No doubt taxed at a different rate.

There are no provisions in the system in place to make sure that Tejon Centennial will be built. There is no what-if to assess the damage plans for Centennial will do to local and neighbor investors if it does not go forward.

In my opinion TRC (Tejon Ranch stock ticker) is a way for the 1% club to park their money in real estate to avoid paying short term capital gains taxes on the New York Stock market. The machinations of the stock market make are not even mentioned in your DEIR.

The only assumption you make is that the project will be built and that the project serves as a real plan, not a façade. You need to take the damage made to neighbors and the unfairness caused by avoiding property taxes into account in your DEIR in the case where Centennial will not be built and the investors or company decide to sit on the plan and ride it out for whatever financial gain they may have. There are plenty of scenarios I can think of which would allow them to benefit by not building.

G.1-1

Jack Tuszynski

Response to Comment Letter G.1
Jack Tuszynski
July 19, 2017

Response to Comment G.1-1:

Thank you for your comment and your participation in this public process. In accordance with Government Code § 66424.5, the term "tentative map" refers to a map made for the purpose of showing the design and improvement of a proposed subdivision and the existing conditions in and around it and need not be based upon an accurate or detailed final survey of the property. Per Government Code § 66426, tentative maps are required for all subdivisions creating five or more parcels. This comment also questions why the "machinations of the stock market" were not analyzed in the Draft EIR. In accordance with Government Code § 21100(b), the Draft EIR is required to analyze the project's potentially significant effects on the physical environment but, per CEQA Guideline § 15064(e), "[e]conomic and social changes resulting from a project shall not be treated as significant effects on the environment." Since the "machinations of the stock market" are an economic and social concern, they need not be analyzed in the EIR. This comment did not raise concern regarding the Project's potential environmental effects or the adequacy of the Draft EIR. This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

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From: susan rudnicki <susanrudnicki@gmail.com>
Sent: Friday, July 07, 2017 10:12 AM
To: Jodie Sackett
Subject: Reject Tejon Ranch devastating Centennial Project

Dear Mr. Sackett,

I am a resident of Los Angeles for my entire 61 years. We have already experienced the severe changes associated with the latest long term drought, yet the County Regional Planning Department considers a sprawling, thirsty, exurban development in the face of all science and logical thinking to the contrary.

This boondoggle should be rejected. Installing a new city in the middle of the last, best native grassland in the state of California -- far from job centers, public services and transportation -- is a project that has no place in today's smart-planning world.

The mega-development will result in significant increases in air pollution in already bad air basins. It will dump additional commuter traffic onto Interstate 5, exacerbating traffic and pollution. It will create unnecessary carbon pollution due to the location's remoteness and reliance on uncertain promises that multimodal transportation will be provided. I have been following this discussion for years and the developers always want to paint their construction project in shades of "green" for the marketing message appeal of the moment.

We have already been seeing extensive brush fires in California and the West---the "Centennial" sprawl will be another burden on already overtaxed fire surveillance and response at taxpayer's expense for pretentious "country living" surburbanites living in a VERY fire-prone landscape. This is unacceptable risk and absolute recklessness in the era of massive Climate Change. G.2-1

I have gone birding and botanical searching in the Tejon Ranch area under the auspices of the Native Plant Society. It is a gorgeous, tiny remnant of what used to be a wild California.

Los Angeles County should celebrate and protect the site's native grasslands and wildflower fields as the treasures that they are -- a natural legacy to be preserved for future generations. Maintaining the rural nature of the area will also protect the unique plants and animals that call this area home, and preserve the wildlife movement corridors that are essential for climate-change adaptation.

I urge the county to reject the ill-conceived Centennial project and instead designate the site for open space and conservation.

Thank you,

susan rudnicki

90266

Response to Comment Letter G.2
Susan Rudnicki
July 7, 2017

Response to Comment G.2-1:

Thank you for your comment and for your participation in this public process. This comment's characterization of the proposed Project is contrary to the Project's objectives and design features, which promote "smart growth" and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[2769] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[2770] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[2771]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[2772] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[2773] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[2774] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[2775] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[2776]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[2777] Rural Town Areas serve as transition area between Rural

[2769] DRP 2015, p. I-2
[2770] *Id.*, p. I-5
[2771] *Id.*, p. I-6
[2772] *Id.*, p. I-5
[2773] *Ibid*.
[2774] *Id.*, p. I-6
[2775] *Id.*, p. I-7
[2776] *Ibid*.
[2777] *Ibid*.

Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[2778] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[2779]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[2780] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[2781] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[2782]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[2783] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[2784] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an

2778 *Ibid*.
2779 *Ibid*.
2780 DRP 2017, p. 4-4
2781 DRP 2015, p. I-8
2782 *Ibid*.
2783 *Id.*, p. I-8
2784 *Ibid*.

area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-240 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[2785] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[2786] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[2787]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[2788] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016-2040 RTP/SCS.[2789] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[2790] This would be made through the operation of low or no emission transportation systems by 2040. The 2016–2040 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[2791] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016–2040 RTP/SCS[2792], are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016–2040 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project "exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect

2785 DRP 2017, pp. 5.8-73; 5.9-23, 27, 31, 33; 5.10-141, 142; 5.11-75; 5.21-85
2786 *Id.,* p. 4-7
2787 *Ibid*.
2788 *Id.,* p. 4-8
2789 *Ibid*.
2790 *Ibid*.
2791 *Ibid*.
2792 SCAG 2016a

public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2)

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[2793] The RWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[2794] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

With respect to this comment's concerns about hazards and fire safety, biological resources, transportation and traffic, air quality, and water supplies and drought please see Sections 5.3 (Fire Hazards and Safety), 5.7 (Biological Resources), 5.10 (Traffic, Access, and Circulation), 5.11 (Air Resources), and 5.18 (Water Resources) of this EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project on the topic of biological resources can be found in these documents: Sections 5.3 (Air Quality), 5.4 (Biological Resources), 5.8 (Hazards and Hazardous Materials), 5.16 (Transportation and Traffic), and 5.17 (Utilities and Service Systems) of the AVAP EIR, and Sections 3.3 (Air Quality), 3.4 (Biological Resources), 3.9 (Hazards and Hazardous Materials), 3.17 (Transportation and Traffic), and 3.18 (Utilities and Service Systems) of the RTP/SCS EIR.

[2793] DRP 2017, p. 4-45
[2794] *Ibid*.

From: Virginia DeMoss <vmdemoss@aol.com>
Sent: Friday, July 07, 2017 10:53 AM
To: Jodie Sackett
Subject: Say "NO" Tejon's Centennial Project

Dear Mr. Sackett,

Please do not let urban sprawl ruin this precious open space in Southern California!

Tejon Ranch's proposed Centennial new city is a bad idea for Los Angeles County and should be rejected. Installing a new city in the middle of the last, best native grassland in the state of California -- far from job centers, public services and transportation -- is a project that has no place in today's smart-planning world.

The mega-development will result in significant increases in air pollution in already bad air basins. It will dump additional commuter traffic onto Interstate 5, exacerbating traffic and pollution. It will create unnecessary carbon pollution due to the location's remoteness and reliance on uncertain promises that multimodal transportation will be provided.

Los Angeles County should celebrate and protect the site's native grasslands and wildflower fields as the treasures that they are -- a natural legacy to be preserved for future generations. Maintaining the rural nature of the area will also protect the unique plants and animals that call this area home, and preserve the wildlife movement corridors that are essential for climate-change adaptation.

I urge the county to reject the ill-conceived Centennial project and instead designate the site for open space and conservation.

G.3-1

Thank you,

Virginia DeMoss

90814

Response to Comment Letter G.3
Virginia DeMoss
July 7, 2017

Response to Comment G.3-1:

Thank you for your comment and for your participation in this public process. This comment's characterization of the proposed Project is contrary to the Project's objectives and design features, which promote "smart growth" and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[2795] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[2796] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[2797]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[2798] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[2799] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[2800] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[2801] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[2802]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[2803] Rural Town Areas serve as transition area between Rural

[2795] DRP. 2015, p. I-2
[2796] *Id.,* p. I-5
[2797] *Id.,* p. I-6
[2798] *Id.*, p. I-5
[2799] *Ibid*.
[2800] *Id.*, p. I-6
[2801] *Id.*, p. I-7
[2802] *Ibid*.
[2803] *Ibid*.

Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[2804] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[2805]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[2806] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[2807] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[2808]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[2809] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[2810] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an

2804 *Ibid*.
2805 *Ibid*.
2806 DRP 2017, p. 4-4
2807 DRP 2015, p. I-8
2808 *Ibid*.
2809 *Id.*, p. I-8
2810 *Ibid*.

area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-240 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[2811] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[2812] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[2813]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[2814] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016-2040 RTP/SCS.[2815] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[2816] This would be made through the operation of low or no emission transportation systems by 2040. The 2016–2040 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[2817] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016–2040 RTP/SCS,[2818] are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016–2040 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project "exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect

2811 DRP 2017, pp. 5.8-73; 5.9-23, 27, 31, 33; 5.10-141, 142; 5.11-75; 5.21-85
2812 *Id.,* p. 4-7
2813 *Ibid*.
2814 *Id.,* p. 4-8
2815 *Ibid*.
2816 *Ibid*.
2817 *Ibid*.
2818 SCAG 2016a

public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2.)

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[2819] The TRCRWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[2820] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

With respect to this comment's concerns about hazards and fire safety, biological resources, transportation and traffic, air quality, and water supplies and drought please see Sections 5.3 (Fire Hazards and Safety), 5.7 (Biological Resources), 5.10 (Traffic, Access, and Circulation), 5.11 (Air Resources), and 5.18 (Water Resources) of this EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project on the topic of biological resources can be found in these documents: Sections 5.3 (Air Quality), 5.4 (Biological Resources), 5.8 (Hazards and Hazardous Materials), 5.16 (Transportation and Traffic), and 5.17 (Utilities and Service Systems) of the AVAP EIR, and Sections 3.3 (Air Quality), 3.4 (Biological Resources), 3.9 (Hazards and Hazardous Materials), 3.17 (Transportation and Traffic), and 3.18 (Utilities and Service Systems) of the RTP/SCS EIR.

[2819] DRP 2017, p. 4-45
[2820] *Ibid*.

From: Karen Tracy <oktracy@mac.com>
Sent: Friday, July 07, 2017 11:22 AM
To: Jodie Sackett
Subject: Tejon's Centennial Project: REJECT

Dear Mr. Sackett,

This amount of massive consumption is bad for everyone and everything except profits.

This project must be rejected in order to save the land and the eco system dependent upon it. To destroy it in order to create a housing/marketing-mega-structure-sprawl is senseless and merely destructive. G.4-1

Karen Tracy

92252

Response to Comment Letter G.4
Karen Tracy
July 7, 2017

Response to Comment G.4-1:

Thank you for your comment and for your participation in this public process. This comment's characterization of the proposed Project is contrary to the Project's objectives and design features, which promote "smart growth" and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[2821] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[2822] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[2823]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[2824] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[2825] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[2826] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[2827] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[2828]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[2829] Rural Town Areas serve as transition area between Rural

[2821] DRP 2015, p. I-2
[2822] *Id.,* p. I-5
[2823] *Id.,* p. I-6
[2824] *Id.*, p. I-5
[2825] *Ibid*.
[2826] *Id.*, p. I-6
[2827] *Id.*, p. I-7
[2828] *Ibid*.
[2829] *Ibid*.

Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[2830] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[2831]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[2832] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[2833] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[2834]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[2835] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[2836] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an

2830 *Ibid*.
2831 *Ibid*.
2832 DRP 2017, p. 4-4
2833 DRP 2015, p. I-8
2834 *Ibid*.
2835 *Id.*, p. I-8
2836 *Ibid*.

area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-240 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[2837] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[2838] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[2839]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[2840] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016-2040 RTP/SCS.[2841] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[2842] This would be made through the operation of low or no emission transportation systems by 2040. The 2016–2040 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[2843] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016–2040 RTP/SCS,[2844] are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016–2040 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project "exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect

2837 DRP 2017, pp. 5.8-73; 5.9-23, 27, 31, 33; 5.10-141, 142; 5.11-75; 5.21-85
2838 *Id.,* p. 4-7
2839 *Ibid*.
2840 *Id.,* p. 4-8
2841 *Ibid*.
2842 *Ibid*.
2843 *Ibid*.
2844 SCAG 2016a

public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2)

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[2845] The TRCRWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[2846] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project on the topic of biological resources can be found in these documents: Section 5.4 of the AVAP EIR, and Section 3.4 of the RTP/SCS EIR.

[2845] DRP 2017, p. 4-45
[2846] *Ibid*.

From: Matt Pakucko <pakuckomat@aol.com>
Sent: Friday, July 07, 2017 11:28 AM
To: Jodie Sackett
Subject: REJECT! Tejon's Centennial Project

Dear Mr. Sackett,

Kill the California Condor? Really?
More urban sprawl into the desert?
Water from where?

Tejon Ranch's proposed Centennial new city is a bad idea for Los Angeles County and should be rejected. Installing a new city in the middle of the last, best native grassland in the state of California -- far from job centers, public services and transportation -- is a project that has no place in today's smart-planning world.

The mega-development will result in significant increases in air pollution in already bad air basins. It will dump additional commuter traffic onto Interstate 5, exacerbating traffic and pollution. It will create unnecessary carbon pollution due to the location's remoteness and reliance on uncertain promises that multimodal transportation will be provided.

Los Angeles County should celebrate and protect the site's native grasslands and wildflower fields as the treasures that they are -- a natural legacy to be preserved for future generations. Maintaining the rural nature of the area will also protect the unique plants and animals that call this area home, and preserve the wildlife movement corridors that are essential for climate-change adaptation.

I urge the county to reject the ill-conceived Centennial project and instead designate the site for open space and conservation.

G.5-1

Thank you,

Matt Pakucko

91326

Responses to Comment Letter G.5
Matt Pakcucko
July 7, 2017

Response to Comment G.5-1:

Thank you for your comment and for your participation in this public process. The Project's objectives and design features promote "smart growth" and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[2847] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[2848] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[2849]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[2850] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[2851] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[2852] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[2853] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[2854]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[2855] Rural Town Areas serve as transition area between Rural Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential

[2847] DRP 2015, p. I-2
[2848] *Id.,* p. I-5
[2849] *Id.,* p. I-6
[2850] *Id.*, p. I-5
[2851] *Ibid*.
[2852] *Id.*, p. I-6
[2853] *Id.*, p. I-7
[2854] *Ibid*.
[2855] *Ibid*.

and light agricultural uses.[2856] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[2857]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[2858] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[2859] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[2860]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[2861] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[2862] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

The Project's objectives and design features implement the AVAP's Rural Preservation Strategy by focusing regional development in an area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from

2856 *Ibid*.
2857 *Ibid*.
2858 DRP 2017, p. 4-4
2859 DRP 2015, p. I-8
2860 *Ibid*.
2861 *Id.*, p. I-8
2862 *Ibid*.

rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[2863] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[2864] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[2865]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[2866] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016 RTP/SCS.[2867] The 2016 RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[2868] This would be made through the operation of low or no emission transportation systems by 2040. The 2016RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[2869] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016 RTP/SCS[2870], are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project "exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2.)

2863 DRP 2017, pp. 5.8-73; 5.9-23, 27, 31, 33; 5.10-141, 142; 5.11-75; 5.21-85
2864 *Id.,* p. 4-7
2865 *Ibid*.
2866 *Id.,* p. 4-8
2867 *Ibid*.
2868 *Ibid*.
2869 *Ibid*.
2870 SCAG 2016a

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[2871] The TRCRWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[2872] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

With respect to this comment's general concerns regarding native grasslands and wildflowers and wildlife corridors, please see Section 5.7, Biological Resources, of the Draft EIR, which disclosed the Project's potential impact to these resources and determined that direct and indirect impacts would be mitigated to a less than significant level, while cumulative impacts for regional wildlife corridors and impacts to native grasslands would be a cumulative significant impact.[2873] With respect to the comment's concern about the Project killing condors, the California condor is a California fully protected species and no condor will be killed; please see Section 5.7 of the Draft EIR.

With respect to this comment's general concerns about hazards and fire safety, transportation and traffic, air quality, and water supplies and drought please see Sections 5.3 (Fire Hazards and Safety), 5.10 (Traffic, Access, and Circulation), 5.11 (Air Resources), and 5.18 (Water Resources) of the Draft EIR for a complete analysis of the Project's related potential impacts.

2871 DRP 2017, p. 4-45
2872 *Ibid.*
2873 *Id.,* pp. 5.7-158, 5.1-162

From: Sandra Namoff <snamoff@gmail.com>
Sent: Friday, July 07, 2017 11:38 AM
To: Jodie Sackett
Subject: Tejon's Centennial Project - Where would the water come from?

Dear Mr. Sackett,

Please do not approve Centennial!! New cities don't make sense in areas where drought conditions lead to major problems with water availability. Just three years ago small municipalities in arid areas of southern California were worried that their wells would be too dry to support their communities. Stop water intensive development in deserts! G.6.1

Thank you,
Sandy Namoff

Sandra Namoff

91711

Response to Comment Letter G.6
Sandra Namoff
July 7, 2017

Response to Comment G.6-1:

Thank you for your comment and for your participation in this public process. With respect to this comment's general concerns about water supply, please see Section 5.18 (Water Resources) of this EIR, which discloses all related Project impacts and identifies measures to reduce such impacts to a less than significant level. See, also, Section 5.17 (Utilities and Service Systems) of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.18 (Utilities and Service Systems) of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035). This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. Drought and water sources are discussed in Section 5.18, Water Resources.

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From: Susan Baraz <sbaraz@anet.net>
Sent: Friday, July 07, 2017 12:18 PM
To: Jodie Sackett
Subject: Reject Tejon's Sanctuary

Dear Mr. Sackett,

Tejon Ranch's proposed Centennial new city is exactly what we DON'T need for LA County!! What are all those homes and industries going to do to our already, polluted, emission soaked environment-congested roadways 5 Freeway, -and lack of places where one can actually breath and has the best native grassland in the state of California -this is yet ANOTHER project that has no place in today's already impacted -planning world. This is callousness at it;s worst. Who needs it, and who would PROFIT from turning this special area into another eye sore-for people who have less and less areas to enjoy, aside from the sanctuary it provides to so many of natures creatures and plant life.
How dare you play god with such valuable natural resources for yet another ugly massive urban sprawl in the middle of nowhere?
SHAME ON YOU ALL!!!

Los Angeles County needs to protect the site's native grasslands and wildflower fields as the treasures that they are -- preserve the wildlife movement corridors that are essential for it's wonderful influence on climate-change,

You MUST reject the ridiculous Centennial project and mark the place as the for open space and conservation for all the benefits it brings to people, clean air, and all life it helps in being such a valuable and precious resource.

G.7-1

Thank you,
Susan Baraz

Susan Baraz

90403

Response to Comment Letter G.7
Susan Baraz
July 7, 2017

Response to Comment G.7-1:

Thank you for your comment and for your participation in this public process. This comment's characterization of the proposed Project is contrary to the Project's objectives and design features, which promote "smart growth" and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[2874] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[2875] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[2876]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[2877] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[2878] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[2879] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[2880] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[2881]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[2882] Rural Town Areas serve as transition area between Rural

2874 DRP 2015, p. I-2
2875 *Id.*, p. I-5
2876 *Id.*, p. I-6
2877 *Id.*, p. I-5
2878 *Ibid*.
2879 *Id.*, p. I-6
2880 *Id.*, p. I-7
2881 *Ibid*.
2882 *Ibid*.

Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[2883] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[2884]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[2885] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[2886] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[2887]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[2888] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[2889] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an

2883 *Ibid*.
2884 *Ibid*.
2885 DRP 2017, p. 4-4
2886 DRP 2015, p. I-8
2887 *Ibid*.
2888 *Id.*, p. I-8
2889 *Ibid*.

area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-240 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[2890] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[2891] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[2892]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[2893] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016-2040 RTP/SCS.[2894] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[2895] This would be made through the operation of low or no emission transportation systems by 2040. The 2016–2040 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[2896] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016–2040 RTP/SCS[2897], are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016–2040 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project "exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect

2890 DRP 2017, pp. 5.8-73; 5.9-23, -27, -31, -33; 5.10-141, 142; 5.11-75; 5.21-85
2891 *Id.,* p. 4-7
2892 *Ibid*.
2893 *Id.,* p. 4-8
2894 *Ibid*.
2895 *Ibid*.
2896 *Ibid*.
2897 SCAG 2016a

public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2)

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[2898] The TRCRWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[2899] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

With respect to this comment's general concerns regarding native grasslands and wildflower, please see Section 5.7 (Biological Resources) of the Draft EIR, which disclosed the Project's potential impact to this resource and determined that direct and indirect impacts would be mitigated to a less than significant level, while cumulative impacts would be significant after mitigation.[2900]

With respect to this comment's general concerns about traffic and air quality, please see Sections 5.10 (Traffic, Access, and Circulation), 5.11 (Air Resources), and 5.13 (Visual Resources) of this EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project can be found in these documents: Sections 5.1 (Aesthetics), 5.3 (Air Quality), 5.4 (Biological Resources), and 5.16 (Transportation and Traffic) of the AVAP EIR, and Sections 3.1 (Aesthetics), 3.3 (Air Quality), 3.4 (Biological Resources), and 3.17 (Transportation and Traffic) of the 2016-2040 RTP/SCS EIR.

[2898] DRP 2017, p. 4-45
[2899] *Ibid*.
[2900] *Id.,* pp. 5.7-158, 5.1-162

From: Rose Ann Witt <rawitt@verizon.net>
Sent: Friday, July 07, 2017 2:21 PM
To: Jodie Sackett
Subject: Tejon's Centennial Project Must be Rejected!

Dear Mr. Sackett,

Tejon Ranch's proposed Centennial new city is a bad idea for Los Angeles County and should be rejected. Installing a new city in the middle of the last, best native grassland in the state of California -- far from job centers, public services and transportation -- is a project that has no place in today's smart-planning world.

The mega-development will result in significant increases in air pollution in already bad air basins. It will dump additional commuter traffic onto Interstate 5, exacerbating traffic and pollution. It will create unnecessary carbon pollution due to the location's remoteness and reliance on uncertain promises that multimodal transportation will be provided.

Los Angeles County should celebrate and protect the site's native grasslands and wildflower fields as the treasures that they are -- a natural legacy to be preserved for future generations. Maintaining the rural nature of the area will also protect the unique plants and animals that call this area home, and preserve the wildlife movement corridors that are essential for climate-change adaptation.

As a biologist and concerned California taxpayer, I urge the county to reject the ill-conceived Centennial project and instead designate the site for open space and conservation.

G.8-1

Thank you,

Rose Ann Witt

91362

Response to Comment Letter G.8
Rose Ann Witt
July 7, 2017

Response to Comment G.8-1:

Thank you for your comment and for your participation in this public process. This comment's characterization of the proposed Project is contrary to the Project's objectives and design features, which promote "smart growth" and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[2901] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[2902] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[2903]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[2904] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[2905] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[2906] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[2907] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[2908]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[2909] Rural Town Areas serve as transition area between Rural

[2901] DRP 2015, p. I-2
[2902] *Id.,* p. I-5
[2903] *Id.,* p. I-6
[2904] *Id.*, p. I-5
[2905] *Ibid*.
[2906] *Id.*, p. I-6
[2907] *Id.*, p. I-7
[2908] *Ibid*.
[2909] *Ibid*.

Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[2910] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[2911]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[2912] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[2913] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[2914]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[2915] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[2916] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an

2910 *Ibid*.
2911 *Ibid*.
2912 DRP 2017, p. 4-4
2913 DRP 2015, p. I-8
2914 *Ibid*.
2915 *Id.*, p. I-8
2916 *Ibid*.

area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-240 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[2917] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[2918] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[2919]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[2920] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016-2040 RTP/SCS.[2921] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[2922] This would be made through the operation of low or no emission transportation systems by 2040. The 2016–2040 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[2923] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016–2040 RTP/SCS,[2924] are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016–2040 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project "exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect

2917 DRP 2017, pp. 5.8-73; 5.9-23, -27, -31, -33; 5.10-141, 142; 5.11-75; 5.21-85
2918 *Id.,* p. 4-7
2919 *Ibid*.
2920 *Id.,* p. 4-8
2921 *Ibid*.
2922 *Ibid*.
2923 *Ibid*.
2924 SCAG 2016a

public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2)

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[2925] The TRCRWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[2926] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

With respect to this comment's general concerns regarding native grasslands and wildflower, please see Section 5.7 (Biological Resources) of the Draft EIR, which disclosed the Project's potential impact to these resources. As discussed, direct and indirect impacts to native grasslands would be mitigated to a less than significant level, while cumulative impacts would be significant after mitigation.[2927]

With respect to this comment's general concerns about hazards and fire safety, transportation and traffic, air quality, and water supplies and drought please see Sections 5.3 (Fire Hazards and Safety), 5.10 (Traffic, Access, and Circulation), 5.11 (Air Resources), and 5.18 (Water Resources) of this EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project can be found in these documents: Sections 5.3 (Air Quality), 5.4 (Biological Resources), 5.8 (Hazards and Hazardous Materials), 5.16 (Transportation and Traffic), and 5.17 (Utilities and Service Systems) of the AVAP EIR, and Sections 3.3 (Air Quality), 3.4 (Biological Resources), 3.9 (Hazards and Hazardous Materials), 3.17 (Transportation and Traffic), and 3.18 (Utilities and Service Systems) of the RTP/SCS EIR.

[2925] DRP 2017, p. 4-45
[2926] *Ibid*.
[2927] *Id.,* pp. 5.7-158, 5.1-162

From: Marianna Breton <marianna2pep@yahoo.com>
Sent: Friday, July 07, 2017 6:53 PM
To: Jodie Sackett
Subject: Reject Centennial housing project in the middle of the desert

Dear Mr. Sackett,

This Centennial development in Antelope Valley is a bad idea for Los Angeles County and should be rejected. Installing a new mega city in the middle of the last, best native grassland in the state of California is an environmental disaster which will create more gridlock on arteries leading into the city.

Los Angeles County should celebrate and protect the site's native grasslands and wildflower fields as the treasures that they are -- a natural legacy to be preserved for future generations. Maintaining the rural nature of the area will also protect the unique plants and animals that call this area home, and preserve the wildlife movement corridors that are essential for climate-change adaptation.

L.A. County regional planning must reject this proposal as there is plenty of available housing the high desert communities.

G.9-1

Thank you,

Marianna Breton

91765

Response to Comment Letter G.9
Marianna Breton
July 7, 2017

Response to Comment G.9-1:

Thank you for your comment and for your participation in this public process. This comment's characterization of the proposed Project is contrary to the Project's objectives and design features, which promote "smart growth" and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[2928] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[2929] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[2930]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[2931] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[2932] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[2933] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[2934] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[2935]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[2936] Rural Town Areas serve as transition area between Rural

[2928] DRP 2015, p. I-2
[2929] *Id.*, p. I-5
[2930] *Id.*, p. I-6
[2931] *Id.*, p. I-5
[2932] *Ibid*.
[2933] *Id.*, p. I-6
[2934] *Id.*, p. I-7
[2935] *Ibid*.
[2936] *Ibid*.

Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[2937] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[2938]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[2939] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[2940] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[2941]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[2942] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[2943] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an

2937 *Ibid*.
2938 *Ibid*.
2939 DRP 2017, p. 4-4
2940 DRP 2015, p. I-8
2941 *Ibid*.
2942 *Id.*, p. I-8
2943 *Ibid*.

area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-240 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[2944] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[2945] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[2946]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[2947] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016-2040 RTP/SCS.[2948] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[2949] This would be made through the operation of low or no emission transportation systems by 2040. The 2016–2040 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[2950] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016–2040 RTP/SCS,[2951] are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016–2040 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project "exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect

2944 DRP 2017, pp. 5.8-73; 5.9-23, -27, -31, -33; 5.10-141, 142; 5.11-75; 5.21-85
2945 *Id.,* p. 4-7
2946 *Ibid*.
2947 *Id.,* p. 4-8
2948 *Ibid*.
2949 *Ibid*.
2950 *Ibid*.
2951 SCAG 2016a

public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2)

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[2952] The TRCRWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[2953] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

With respect to this comment's general concerns regarding native grasslands and wildflower, please see Section 5.7, Biological Resources, of the Draft EIR, which disclosed the Project's potential impact to these resources. As discussed, direct and indirect impacts to native grasslands would be mitigated to a less than significant level, while cumulative impacts would be significant after mitigation.[2954]

With respect to this comment's general concerns about transportation and traffic, please see Section 5.10, Traffic, Access, and Circulation, of the Draft EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project can be found in these documents: Sections 5.4 (Biological Resources) and 5.16 (Transportation and Traffic) of the AVAP EIR, and Sections 3.4 (Biological Resources) and 3.17 (Transportation and Traffic) of the RTP/SCS EIR.

[2952] DRP 2017, p. 4-45
[2953] *Ibid*.
[2954] *Id.,* pp. 5.7-158, 5.1-162

From: Brad Berger <bberger@uci.edu>
Sent: Saturday, July 08, 2017 8:02 AM
To: Jodie Sackett
Subject: Bad Idea: Tejon's Centennial Project

Dear Mr. Sackett,

Tejon Ranch's Centennial Project would destroy yet another piece of the dwindling "old California" that gives the region character. The sparsely developed 138 corridor is a much needed buffer between the growth of the Lancaster/Palmdale area, and the south end of the decimated central valley of California. G.10

Please reject this plan.

Brad Berger

92268

Response to Comment Letter G.10
Brad Berger
July 8, 2017

Response to Comment G.10-1:

Thank you for your comment and for your participation in this public process. This comment's assertion that the Project would destroy the character of the region is contrary to the Project's objectives and design features, which protect the rural character of the region, promote "smart growth," and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[2955] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[2956] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[2957]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[2958] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[2959] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[2960] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[2961] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[2962]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-

[2955] DRP 2015, p. I-2
[2956] *Id.,* p. I-5
[2957] *Id.,* p. I-6
[2958] *Id.*, p. I-5
[2959] *Ibid*.
[2960] *Id.*, p. I-6
[2961] *Id.*, p. I-7
[2962] *Ibid*.

oriented commercial uses.[2963] Rural Town Areas serve as transition area between Rural Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[2964] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[2965]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[2966] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[2967] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[2968]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[2969] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[2970] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

2963 *Ibid*.
2964 *Ibid*.
2965 *Ibid*.
2966 DRP 2017, p. 4-4
2967 DRP 2015, p. I-8
2968 *Ibid*.
2969 *Id.*, p. I-8
2970 *Ibid*.

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-240 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[2971] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[2972] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[2973]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[2974] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016-2040 RTP/SCS.[2975] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[2976] This would be made through the operation of low or no emission transportation systems by 2040. The 2016–2040 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[2977] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016–2040 RTP/SCS,[2978] are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016–2040 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project

2971 DRP 2017, pp. 5.8-73; 5.9-23, -27, -31, -33; 5.10-141, 142; 5.11-75; 5.21-85
2972 *Id.,* p. 4-7
2973 *Ibid*.
2974 *Id.,* p. 4-8
2975 *Ibid*.
2976 *Ibid*.
2977 *Ibid*.
2978 SCAG 2016a

"exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2)

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[2979] The TRCRWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[2980] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

With respect to this comment's reference to the region's "character," it is assumed that the Commenter is raising a concern about the visual character of the Project site. As discussed in Section 5.13, Visual Resources, the Project proposes to preserve many existing features to minimize the visual alteration of the site, as listed in PDFs 13-1 through 13-6, as required for implementation through MMs 7-13 from Section 5.7, Biological Resources, and MMs 13-1 through 13-3. These include retention of rock outcroppings visible from off-site areas; use of landform/contour grading; use of landscaping designs that are similar to the natural topography; preservation of open space; use of native and regionally appropriate plant species in public landscape areas; provision of development setbacks from natural areas; and inclusion of aesthetically pleasing and consistent Project signing both internally and externally. However, even with these features, the overall change to the site resulting from grading and development of the Project would be a substantial visual impact that may be perceived by some as an impact for which no additional feasible mitigation exists. As such, the Draft EIR describes the significant and unavoidable impacts related to a change in visual character of the Project site, as experienced by viewers at public vantage points (primarily existing transportation thoroughfares including SR-138 and 300th Street West).

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

[2979] DRP 2017, p. 4-45
[2980] *Ibid*.

topic of aesthetics can be found in these documents: Section 5.1 of the AVAP EIR, and Section 3.1 of the RTP/SCS EIR.

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From: Samuel Dea <sdea@planning.lacounty.gov>
Sent: Monday, July 10, 2017 7:28 AM
To: Kristin Starbird; Jodie Sackett
Subject: FW: Centenial Project DEIR, SCH # 2001031072

Please add Mr. Bourgeois to the notification list.

Sam

From: jbourg2271@aol.com [mailto:jbourg2271@aol.com]
Sent: Sunday, July 02, 2017 1:12 PM
To: Samuel Dea <sdea@planning.lacounty.gov>
Cc: JBourg2271@aol.com; jbourgeois029@gmail.com
Subject: Centenial Project DEIR, SCH # 2001031072

Mr. Dea,

I am requesting under Public Resource Code Section 21092.2 to add the email addresses and mailing address below to the notification list, regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. G.11-1

jbourg2271@aol.com

jbourgeois029@gmail.com

Mailing Address:

160 W. Foothill Parkway S Ste. 105-92

Corona, Ca 92882

Please confirm receipt of this email.

Thank You,

Joe Bourgeois

Response to Comment Letter G.11
Joe Bourgeois
July 2, 2017

Response to Comment G.11-1:

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

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Pamela De Vries

Botany
Restoration Ecology

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E-mail:
pdevries@frazmtn.com

July 4, 2017

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

Via email and USPS

Re: Comments on the Centennial Project Draft Environmental Impact Report
State Clearinghouse No. 2004031072
County Project No. 02-232
General Plan Amendment No. 02-232
Zone Change No. 02-232
Vesting Tentative Parcel Map No. 060022
Conditional Use Permit No. 02-232
Development Agreement No. RPPL2016003940

Dear Mr. Sackett:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Tejon Ranch Centennial Project.

My comments are primarily concerned with the presentation of existing biological conditions, specifically the accuracy of the mapping of vegetation types on the project site. I also have several comments on the discussion of rare plants.

General Comments on Vegetation Mapping and Related Discussions

The vegetation map presented in the DEIR is based on mapping surveys that were conducted almost twelve years ago, in August and September of 2005 (apart from a newly incorporated portion of the project site east of 300th St. W. that was mapped in August 2015). There is no indication in this DEIR that the vegetation map developed in 2005 has been ground-truthed for accuracy anytime during the last twelve years; it is reasonable to assume that at least some changes have occurred over this long period of time and that the vegetation map as presented is not completely accurate. G.12-1

Likewise, the discussion of vegetation types is outdated. In the methodology section, Paragraph 4 of the Vegetation Mapping section states that the "Nomenclature for G.12-2

vegetation types generally follows that of The Vegetation Classification and Mapping Program: List of California Terrestrial Natural Communities Recognized by the California Natural Diversity Database (CDFG 2010)." This title is not included in the reference section; however, the following entry is included in the reference section:

California Department of Fish and Game (CDFG). 2010 (September). *List of Vegetation Alliances and Associations, Vegetation Classification and Mapping Program.*

The actual nomenclature used in the report appears to be based on *The Vegetation Classification and Mapping Program List of California Terrestrial Natural Communities Recognized by the California Natural Diversity Database* published by The Wildlife and Habitat Data Analysis Branch of the Department of Fish and Game in September 2003. This 2003 document was superseded by the *List of Vegetation Alliances and Associations. Vegetation Classification and Mapping Program*, published by the California Department of Fish and Game in September 2010. The *List of Vegetation Alliances and Associations* is based on *A Manual of California Vegetation*, 2nd Edition, published by the California Native Plant Society, Sacramento, in 2009. Unlike the 2003 *List*, the 2009 *Manual of California Vegetation* (and likewise, the 2010 *List of Vegetation Alliances*) classifies vegetation types based on Alliances, which are floristically defined vegetation types identified by their dominant and/or characteristic species. The CNDDB numeric codes used in the 2003 publication are also no longer valid in the updated *List of Vegetation Alliances and Associations.*

The use of 2003 nomenclature and numeric coding with an apparent reference to the 2010 standards is confusing in the DEIR. For example:

G.12-2 cont.

Goldenbush Scrub (30.000.00): This code is from the 2003 list and refers to the general category of Scrub and Chaparral. Neither goldenbush scrub or this numeric code are included in the 2010 list. This vegetation type should be reclassified as *Ericameria linerifolia* alliance with the new code, 38.125.00.

Great Basin Scrub (35.000.00): Neither Great Basin Scrub or the code 35.000.00 are included in the 2010 list. The text indicates that this is a vegetation type that is 'dominated by rubber rabbitbrush (*Ericameria nauseosa*).' It should be reclassified as the *Ericameria nauseosa* alliance, 35.310.00.

Rabbitbrush Scrub (35.300.00): The text indicates that this vegetation type is dominated by 'rubber rabbitbrush,' and it appears to be the same vegetation type as 'Great Basin Scrub,' (see comment above).

Alluvial Scrub (32.070.00): Alluvial scrub does not appear in the 2010 list. The code 32.070.00 refers to Scalebroom Scrub (*Lepidospartum squamatum*) in the 2003 list and to the *Eriogonum fasciculatum-(Lepidospartum squamatum*) alluvial fan alliance in the 2010 list. The text for this vegetation type indicates that it is dominated by tarragon (*Artemisia dracunculus*) and rubber rabbitbrush. Although *Lepidospartum* is mentioned in the text, this vegetation type should probably be reclassified as *Artemisia dracunculus* alliance, 35.160.01.

Riparian Herb (45.000.00): Riparian Herb does not appear in the 2010 list. The code 45.000.00 refers to the general classification of 'Meadows and Seeps not dominated by grasses' in the 2003 list. The text indicates a variety of co-dominants, including tarragon and beardless wild-rye (*Elymus triticoides*), which is a native perennial grass. This vegetation type should be reclassified, possibly as an *Artemisia dracunculus* alliance (35.160.01) and combined with the reclassified Alluvial scrub type mentioned above.

I have not addressed every vegetation type presented in the DEIR in the above examples. Virtually all of the vegetation types and CNDDB codes included in the DEIR are based on the outdated 2003 list and should be revised to the more current 2010 published standards which are accepted by both California Department of Fish and Wildlife and the U.S. Department of Fish and Wildlife. Rare vegetation types should also be reviewed and/or revised based on the current classifications and standards. I will address the *Grass- and Herb-Dominated* vegetation type discussion separately below.

G.12-2 cont.

Delineation and Discussion of Grassland Vegetation Types

The methods section includes a discussion on the Delineation of Grasslands (Page 5.7-25). The second paragraph in this section begins with the following statement:

> There is no official operational definition of "native perennial grassland" that has been published by the CDFW, CNPS, or California Native Grass Association (CNGA).

This statement is not accurate. In the key to herbaceous vegetation included in *The Manual of California Vegetation* published by the California Native Plant Society (Sawyer, Keeler-Wolf and Evans, 2009), a perennial grassland is defined as having "Native plants diagnostically present with >10% relative cover; non-native annual plants may be present at high cover—Perennial grasslands and herblands" (page 736, dichotomous couplet 9'). These stands are further delineated as either coastal prairie or drier interior types. Among the alliances included in the drier interior climates of California are the *Nassella cernua* (provisional) alliance, the *Poa secunda* alliance, and the *Leymus triticoides* alliance, all of which are present on the Centennial project site. [Note current nomenclature for *Nassella cernua* is *Stipa cernua* and current nomenclature for *Leymus triticoides* is *Elymus triticoides* (*The Jepson Manual*, 2nd Ed 2012).]

The Centennial Specific Plan Biota Report prepared for the project in 2006 (BonTerra 2006) stated that 'field mapping of non-native annual grasslands and native perennial bunchgrass vegetation types will be completed in Spring 2006…' and that the mapping method would 'utilize a native perennial grassland definition that is based on at least 20 percent relative cover of all native perennial bunchgrass species.' The Centennial Specific Plan Biota report itself is over ten years old and is out of date. I am not aware of any updates to this Biota report which was originally prepared and submitted in 2006. Current SEATAC recommendations for Biological Constraints Analysis (BCA) and subsequent Biota reports state that a vegetation map based on the alliances and associations described in *The Manual of California Vegetation* should be included.

G.12-3

None of the grasslands within the project site were differentiated and/or quantified into appropriate native perennial or semi-natural (e.g., non-native) stands in the DEIR. Likewise, none of the grasslands in proposed on-site and off-site mitigation areas were differentiated and quantified. Over 70 percent of the undifferentiated grasslands within the project boundaries will be impacted by project implementation (approximately 6,415 acres out of 9,161 acres). Although considerable information regarding the distribution and composition of the grasslands on the project site is presented in the DEIR, there is no quantitative accounting of native perennial grasslands on the site, whether it is based on the 20 percent cover described in the Biota Report or on the more appropriate ten percent cover value described in *The Manual of California Vegetation*. There is also no legitimate rational included in the DEIR that justifies presenting these grasslands as undifferentiated. In fact, in many instances, the grassland studies include results that indicate that native perennial bunch grasses are present with high cover values in many areas (Vollmar 2004).

Native perennial grasslands are a special status vegetation type. A native perennial grassland is identified by the simple presence of a native perennial grass species. Any competent botanist is capable of delineating native perennial grasslands and non-native annual grassland vegetation types in the field based on the criteria included in *The Manual of California Vegetation*. Because these vegetation types have not been quantified on either the project site or on proposed mitigation areas, it is not possible to determine if the proposed mitigation areas adequately compensate for the loss of thousands of acres of native perennial grasslands on the project site.

G.12-3 cont.

Special Status Plant Species

Please review Table 5.7-5, Special Status Plant Species. Bakersfield cactus (*Opuntia basilaris* var. *treleasei*) is included on this table with the comment that no suitable habitat is present on the site; however, the discussion for this taxon includes the updated information that a population of Bakersfield cactus was documented within one mile of the project site, and that suitable habitat does exist on the project site.

The discussion for slender mariposa lily (*Calochortus clavatus* var. *gracilis*) is somewhat ambiguous as to the determination of presence/absence on the project site. It seems that surveys were not conducted at the appropriate time to positively identify this taxon on the site. The discussion states that the determination of slender mariposa lily for the plants observed during the focused survey cannot be ruled out; however, the locations of these plants were not included in the rare plant observations graphic, Exhibit 5.7-7a.

G.12-4

Additional General Comments

Some of the plant nomenclature included in the report is outdated. For example, the Coffeeberry Scrub vegetation type discussion identifies hoary coffeeberry as *Frangula tomentella* ssp. *cuspidata.* The most current nomenclature for this taxon is *Frangula californica* subsp. *cuspidata* (The Jepson Manual, 2nd Ed. Baldwin et al 2012).

G.12-5

The Plant and Wildlife Compendia (Appendix A-5) seems to be missing a few plant taxa that have been observed and previously reported on the project site. For example, beavertail cactus (*Opuntia basilaris* var. *basilaris*) was reported on the project site by Vollmar in 2003 (Vollmar 2004). This taxon is not included on the current Plant and Wildlife compendia. Other examples are perennial spike rush (*Eleocharis macrostachya*), mosquito fern (*Azolla filiculoides*), and common yarrow (*Achillea millefolium*). Does the plant compendium only include taxa observed during more recent surveys? G.12-6

Please feel free to contact me if you have any questions regarding these comments.

Sincerely,

Pam De Vries
Botanist

References Cited

Baldwin, B.G., D.H. Goldman, D.J. Keil, R. Patterson, T.J. Rosatti and D.H. Wilken, editors. 2012. The Jepson Manual: vascular plants of California, second edition. University of California Press, Berkeley, CA.

BonTerra Consulting. 2006. Biota Report for the Centennial Specific Plan in Northwestern Antelope Valley, Northern Los Angeles County, California. Report prepared for Centennial Founders, LLC, February 2006.

California Department of Fish and Game (CDFG) 2003. The Vegetation Classification and Mapping Program: List of California Terrestrial Natural Communities Recognized by the California Natural Diversity Database. Wildlife and Habitat Data Analysis Branch, Sacramento, CA

California Department of Fish and Game (CDFG). 2010. List of Vegetation Alliances and Associations. Vegetation Classification and Mapping Program, California Department of Fish and Game. Sacramento, CA. September 2010.

Sawyer, J.O, T. Keeler-Wolf and J. Evens. 2009. A Manual of California Vegetation, second edition. California Native Plant Society, Sacramento, CA.

Vollmar Consulting. 2004. Centennial Specific Plan Project Site 2003/2004 Botanical Survey Report. Report prepared for Impact Sciences, Inc., December 2004.

Responses to Comment Letter G.12
Pamela De Vries, Botanist
July 4, 2017

Response to Comment G.12-1:

The comment expresses concern for the length of time since the vegetation mapping was conducted on the majority of the Project site. For the vast majority of focused biological surveys, a gap in time of over five years would render them outdated and they would need to be repeated or updated. In regard to vegetation mapping, on a site with relatively stable site conditions (e.g. restricted access, no fires or other major disturbances outside cattle grazing), and with vegetation types that are typically slow growing and have adaptions to the conditions found on the Project site (e.g. desert scrub, oak woodland), a change in vegetation types or dominant species composition is highly unlikely and unexpected. Therefore, the vegetation map used in the Draft EIR is expected to reflect current conditions or may be more conservative in protecting special status vegetation types.

Response to Comment G.12-2:

The comment states there are inconsistencies between vegetation type nomenclature used throughout the document, and what is cited and referenced. Additionally, the comment states that the vegetation type nomenclature is outdated. The comment is correct that there is a citation error in Section 5.7.3, Environmental Setting, and Section 5.7.9, References, in regard to the literature used to classify the vegetation types. The vegetation types used in the Draft EIR were based on The Vegetation and Mapping Program List of California Terrestrial Natural Communities Recognized by the 2003 California Natural Diversity Database. The methods section and references section will be updated to reflect this. The Draft EIR vegetation descriptions contain sufficient information which enables the reader to understand the composition of the vegetation occurring as well impacted on the project site. Although vegetation classification systems and associated naming conventions have changed in more recent years and appear to be continually changing in regard to industry standard or scientific community acceptation, the vegetation composition has not changed.

In response to this comment, the first sentence of the last paragraph on page 5.7-24 of the Draft EIR is hereby revised as follows:

> Nomenclature for vegetation types in the areas described in the paragraph above generally follows that of The Vegetation Classification and Mapping Program: *List of California Terrestrial Natural Communities Recognized by the California Natural Diversity Database* (CDFG ~~2010~~ 2003).

In addition, page 5.7-197 in Section 5.7.9, References, of the Draft EIR is hereby revised as follows:

> California Department of Fish and Game (CDFG). ~~2010~~ 2003 (September). *List of Vegetation Alliances and Associations, Vegetation Classification and Mapping Program.* Sacramento, CA: CDFG.

Response to Comment G.12-3:

The comment requests justification in the vegetation mapping of the undifferentiated grasslands on the Project site, and states that it is unknown whether proposed mitigation lands will adequately compensate for grasslands found on the Project site. The definition of "native grasslands" has varied over time and from region to region (please see response to Comment G.12-2). Ultimately, it was determined that the most conservative approach to mapping "native grasslands" was to conduct intensive species composition studies using quadrats to measure and record species and cover as precisely as possible within randomly selected sample locations within the grasslands.[2981] This data was then used to develop a model predicting the composition of grasslands across the site and Mitigation Preserve areas.[2982] As a result, the data gathered and provided in the Draft EIR is more than just the current naming convention at the time. Additionally, the distribution of areas above and below 10 percent native absolute or relative cover is extremely mixed with areas continually shifting from above and below this threshold. In an effort to ensure the appropriate impact assessment and mitigation, the Draft EIR takes a conservative approach by identifying acreages of impacts of above and below 10 percent but requiring 2:1 mitigation for all grassland impacts.[2983] The acreage of all grasslands is substantially greater than the acreage of the above 10 percent native grass cover. In regard to the Centennial Specific Plan Biota report referred to in the comment, the document was prepared for Significant Ecological Area Technical Advisory Committee as part of the Los Angeles County permitting process for Project with impacts to Significant Ecological Areas (SEAs). Initially, the Project was proposed to impact small portions of two SEAs and was accordingly processing the Project with a biota report. However, the Project has been redesigned and SEA boundaries have also been changed by Los Angeles County such that the Project's disturbance footprint is now entirely outside of any SEA.[2984] As a result, the SEA process and the biota report are no longer required. Section 5.7, Biological Resources, of the Draft EIR contains a full technical level of baseline conditions, impact assessment, and mitigation, and no additional biological resource technical document is necessary.

Response to Comment G.12-4:

The comment notes the habitat potential for Bakersfield cactus, a special status plant species, is inconsistent between the special species plant table and the discussion for this species.

2981 DRP 2017, pp. 5.7-26 and -27
2982 *Ibid.*
2983 *Id.,* p. 5.7-180, MM 7-10
2984 *Id.,* p. 5.7-2

In response to this comment, Table 5.7-5, Special Status Plant Species Table, on page 5.7-72 of the Draft EIR is hereby revised as follows:

Opuntia basilaris var. *treleasei* Bakersfield cactus	FE	SE	1B.1	Alluvial benches and fans in arid plains. ~~No suitable habitat is present on the site. Not expected to occur.~~ In 2013, a population was discovered approximately one mile from the survey area. Potentially suitable habitat occurs on the site. Potential to occur.	Not Observed

Additionally, the comment seeks clarification on the identification of slender mariposa lily, a special status plant species, during special status plant surveys. The northern most collection record for slender mariposa lily is in the Liebre Mountains approximately 7 miles south of the Project site.[2985] Based on the only blooming records of this species in 2015, which were 1,000 feet below the elevation range of the Project site[2986], peak bloom on the Project site would be estimated at middle of May. In May, surveys were conducted on the Project site beginning May 25th. Slender mariposa lily had a low potential to occur on the project site based on limited potentially suitable habitat and being more than five miles outside the known region for the species.[2987] However, if it were present, it is highly likely it would have been found during the May surveys.[2988] Although slender mariposa lily cannot be categorically ruled out, based on the low potential to occur and micro habitat preferences for this species being limited (high ridgelines and steep slopes), it is not reasonable to assume the fruiting individuals observed were slender mariposa lily. It is more reasonable to assume fruiting individuals were of desert mariposa lily (*Calochortus kennedyi*) or butterfly mariposa lily (*Calochortus venustus*), which were observed within the Project site.[2989]

Response to Comment G.12-5:

This comment makes the statement that some of the plant nomenclature is outdated in the Draft EIR. Plant nomenclature is nearly always changing within one genus or another from month-to-month and year-to-year. The particular species mentioned in the comment will be updated, however, it is expected that any other scientific names that may be from a previous version of literature can be cross-referenced to arrive at the most current taxonomy. The taxonomy used in the Draft EIR is sufficient for assessing plant species impacts. In response to this comment, page 5.7-35 in Section 5.7.3, Environmental Setting, is hereby revised as follows:

[2985] CCH 2017
[2986] CNDDB 2017
[2987] DRP 2017, Table 5.7-5, p. 5.7-69
[2988] *Ibid.*
[2989] *Id.,* p. 5.7-75

Coffeeberry Scrub (37.000.00)

This vegetation type is dominated by hoary coffeeberry (*Frangula ~~tomentella~~ californica* ssp. *cuspidata*) and oak gooseberry (*Ribes quercetorum*).

Response to Comment G.12-6:

This comment makes the statement that some plant species may be missing from the Draft EIR plant compendia. The plant compendium is intended be inclusive of all plant species found on the project site. Depending on the current taxonomic nomenclature, some names may be different than originally reported. In addition, survey areas covered within some past reports are different than current site boundaries. In these cases, every effort has been made to ensure an accurate compendium by including species from within the current site boundaries and excluding those which are not as best can be determined from review of those reports. In order to provide clarification regarding the species mentioned in the comment, Appendix 5.7-A of the Draft EIR, is hereby revised as follows. A revised version of this Appendix has been provided as part of this Final EIR, as Appendix 5.7-A.Rev, Plant and Wildlife Compendia (Revised).

On page A-1 within the row after Asteraceae, the species below is inserted:

Asteraceae	
Achillea millefolium	Common yarrow
Achyrachaena mollis	Blow wives

On page A-3 within the row after *Xanthium strumarium*, Rough cocklebur, the family and species below are inserted:

Xanthium strumarium	Rough cocklebur
Azollaceae	
Azolla filiculoides	Mosquito fern
Boraginaceae	
Amsinckia intermedia	Common fiddleneck

On page A-4 within the row after *Tripidocarpum gracile*, Dobie pod, the family and species below are inserted:

Tropidocarpum gracile	Dobie pod
Cacteacea	
Opuntia basilaris var. *basilaris*	beavertail
Caryophyllaceae	
Minuartia douglasii	Douglas' stitchwort

On page A-5 within the row after *Cyperus eragrostis*, Tall flatsedge, the species below is inserted:

Cyperus eragrostis	Tall flatsedge
Eleocharis macrostachya	Common spikerush
Eleocharis sp.	Spikerush

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Mr. John Adargo
PO Box 1412
Lebec, CA 93243-1412

LETTER REC'D 7-12-17

Gmail

John Adargo <jadargo1@gmail.com>

Proposed Project by Quail Lake. (Centennial)

1 message

John Adargo <jadargo1@gmail.com> Sat, Jul 8, 2017 at 1:06 PM
Reply-To: jadargo1@gmail.com
To: centennial@planning.lacounty.gov

To whom it may concern, or Mr. Jodie Sackett:

My ancestors inhabited this area, our families families, for over 4000 years. The White people Massacured, Murdered, imprisoned, enslaved and starved our families for this land. If you tear up this soil, you will expose a deadly spore hidden in the soil. It is a curse from our ancestors. It will infect the people who breathe the dust from the land, which contains the bones and blood of our families, and cause respiratory illness and even death. G.13-1

This curse exists because this land you call Tejon Ranch, belongs to our people, the people of the Earth. The Native People of the Earth, which this land belongs to, are still here, only we have intermarried and mixed our blood with you white people.

The Quail Lake area is sacred ground. You will encounter great burden if this land is scared (excavated/developed). The Birds that come here number in the hundreds of species. The frogs, lizards, snakes, rabbits, squirrels, fox, raccoon, and all the other wildlife will also be displaced. G.13-2

The water in the ground and the water in the lake will become contaminated with all the runoff. This is a very foolish thing you are trying to do, as you well know, shit runs downhill. I cannot believe that a human being, who is responsible to be the steward of the Earth will allow this project to continue, being built on sacred Indian Ground, you know you will succumb to really bad juju. G.13-3

I know that the Greed that drives you people to do these things to the Earth blinds you from the true meaning of Life. G.13-4
We are here only temporarily, and we must leave this Earth a better place for future generations.

The way you are going to rape this land to put a whole bunch of people that poop and drink and shower and flush and drive and all, bunched up in a small area, crowding them in to wait in lines to get on a freeway which can barely hold the traffic it currently has, pumping more pollutants into the atmosphere, using up all the water, which is in short supply already, is simply put, CRAZY. G.13-5

You have lost your minds.

This area has no infrastructure.

Storm Drains are insufficient. Roads are insufficient. This will clog up the I-5 and the 138. People trying to get to work, who commute to the 14 will be jammed up. There is not enough water to supply this project. It takes Millions of gallons of water to do construction, excavation, compaction, soil stabilization, and finally Landscaping. That's even before anyone moves into a home and starts flushing, showering, doing laundry and watering their lawn or washing their car, not to mention filling their pool. There is just not enough water, because we are already on rations right now. G.13-6

Where are all the toilets going to flush to? Sanitation Plant? Water Reclamation? G.13-7

How are you going to mitigate the runoff from this project? How will you be able to keep it out of the Lake? G.13-8

One Spill and the Water supply will be polluted and Los Angeles will be poisoned.

You people that do this are a special breed. I am glad I do not associate with your kind. I don't know how you sleep at night, knowing the land is stolen from the Native People, they were murdered so you could take their land, you sell it off for Greed, and you Rape it until it is poison and uninhabitable. When will you people realize you cannot eat money? G.13-9

Responses to Comment Letter G.13
John Adargo
July 12, 2017

Response to Comment G.13-1:

Thank you for your comment and for your participation in this public process. With regard to the condition Valley Fever, formally known as *Coccidioidomycosis*, this is a fungal disease caused by inhalation of *Coccidioides immitis* spores that are carried in dust and is known to occur in the Antelope Valley. The potential for Valley Fever spores to be found in soils of the Antelope Valley, and the effects of contracting Valley Fever, is fully disclosed in the Draft EIR. The risks from possible exposure of both construction workers and the Project-related population to Valley Fever spores is comprehensively analyzed in Section 5.3, Hazards and Fire Safety, and Section 5.11, Air Resources, of the Draft EIR. The Draft EIR concludes there would be less than significant impacts associated with Valley Fever with implementation of MMs.

Response to Comment G.13-2:

The vast majority of these birds are attracted to the water source Quail Lake has to offer. The Project will not impact Quail Lake and is buffered to the north by approximately 2,500 feet.[2990] The Project is not expected to impact avian visitors to Quail Lake. In addition, the Draft EIR recognizes that Project implementation will displace many individual common wildlife species such as those mentioned in the comment. State CEQA Guidelines require that the Project implement conservation measures to offset this impact to a less than significant level. Mitigation measures are included in the Draft EIR to both set aside large areas of protected lands, as well as enhance existing lands, to help offset impacts to common wildlife species. The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. However, because the comment does not question the adequacy of the Draft EIR, no further response is required.

Response to Comment G.13-3:

Potential Project groundwater and surface water impacts are discussed in Section 5.2, Hydrology and Flood, and Section 5.4, Water Quality of the Draft EIR. All potential hydrological and water quality impacts were determined to be less than significant with the required Project mitigation.

Potential hydrology and flood impacts to Quail Lake are discussed on Draft EIR page 5.2-25, which states that no receiving channels will receive Project development area runoff discharges under developed conditions in the Quail Lake drainage area, which includes the lake. Potential water quality impacts to Quail Lake are discussed on Draft EIR page 5.4-68, which states that no runoff from Project developed areas will occur in the Quail Lake

[2990] DRP 2017, p. 5.7-150

watershed, which includes the lake. Consequently, no runoff from Project developed areas will flow to Quail Lake and the Quail Lake drainage and watershed. The Project development will not affect the hydrology, flood or water quality conditions in the lake and the lake's watershed and drainage system.

Potential cultural resource impacts are discussed in Draft EIR Section 5.6, Cultural and Tribal Resources, and will be less than significant with mitigation (see the significance findings on page 5.6-61).

See, also, Sections 5.5 (Cultural Resources) and 5.9 (Hydrology and Water Quality) of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Sections 3.5 (Cultural Resources) and 3.10 (Hydrology and Water Quality) of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment G.13-4:

The comment and the opinions are noted. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

Response to Comment G.13-5:

The Project's water supplies are discussed in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. Potential freeway impacts are discussed in Draft EIR Section 5.10, Traffic Access and Circulation, and the significance findings are summarized on page 5.10-157. Potential air quality impacts are discussed in Draft EIR Section 5.11, Air Resources, and the significance findings are summarized on page 5.11-83. Potential climate change impacts are discussed in Draft EIR Section 5.21, Climate Change, and the significance findings are summarized on page 5.21-94.

Response to Comment G.13-6:

Existing public facilities and infrastructure in the Project area are discussed on pages 3-9 to 3-11 of Draft EIR Section 3.0, Environmental Setting. As discussed on page 3-22, the Project would be an entirely new and independent development and will not rely on aging infrastructure systems, obsolete structural engineering, or land planning constraints. All on-site infrastructure will be constructed by the Project. As discussed on page 1-9 in Draft EIR Section 1.0, Executive Summary, the Project storm drainage facilities have been designed to meet or exceed the Los Angeles County Municipal Separate Storm Sewer Systems Permit, Low Impact Development Standards Manual, and Low Impact Development hydromodification and hydrology (flood control) requirements for new development. MMs 2-1 and 2-2 require that compliance with these performance standards be confirmed in a Drainage System Engineering and Planning Report submitted to the County during the review and approval of each Project tract map. Project runoff will not exceed the planned

storm drain capacity and will not require construction of additional drainage facilities not considered in the Draft EIR and that could have significant environmental effects. Consequently, storm drain systems will have sufficient capacity for the Project. As discussed in Section 5.10, Traffic Access and Circulation, the Project will be required make fair share payments for off-site roadway construction required for Project plus other cumulative, future transportation demands and to maintain applicable Level of Service (LOS) standards for Interstate 5, State Route (SR) 138, and SR-14. The Project's water supplies are discussed in Section 5.18, Water Resources, and will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. As discussed on pages 5.18-50 and 5.18-51, and in Table 5.18-9, the Draft EIR analysis of Project water demand considers and includes construction period demand over a 20-year buildout period. As discussed on pages 5.18-46 to 5.18-50, and in Table 5.18-7, the Draft EIR analysis of Project water demand considers and includes landscaping and outdoor water demand for Project land uses. Consequently, the Draft EIR includes construction period water demand and landscaping demand, and water supplies are sufficient to serve the Project during construction, at full buildout, and on a sustainable basis after full buildout.

Response to Comment G.13-7:

The proposed Project would be an entirely new and independent development, and all onsite wastewater infrastructure would be constructed by the Project. The locations of the two wastewater reclamation facilities (WRFs) sites and capacities, sewer main lines, pump stations, force mains, and general treatment processes that would be implemented to serve future development under the Specific Plan are discussed on pages 4-59 through 4-61 in Section 4.0, Project Description, of the Draft EIR. Draft EIR Section 5.19, Wastewater Collection, includes a thorough discussion of the proposed Project's wastewater infrastructure. In summary, the Project will include wastewater treatment and recycled water distribution facilities to minimize potable water demand. The two WRFs would be constructed to provide solids handling and biogas reuse and would be connected through a recycled water distribution system to balance the storage and flow of recycled water for use throughout the Project site, primarily for outdoor irrigation. MM 19-2 requires that the Project either be annexed into an existing qualified public utility district (e.g. Golden Valley Municipal Water District) or that a new public utility district (e.g. Project Water Purveyor) be created to serve the Project. See, also, Section 5.17 of the Antelope Valley Area Plan Environmental Impact Report (SCH# 2014061043), and Section 3.18 of the Southern California Association of Governments' 2016-2040 RTP/SCS Environmental Impact Report (SCH# 2015031035).

Response to Comment G.13-8:

Potential Project runoff impacts, including hydrology, flood and water quality impacts, are discussed in Section 5.2, Hydrology and Flood, and Section 5.4, Water Quality. The Draft EIR requires that the Project implement MMs 2-1 to 2-3 to reduce potential hydrology and flood impacts to less than significant levels. Hydrology and flood control MMs 2-4 and 2-5 have been added to the hydrology and flood control mitigation required for the Project at the

request of the Lahontan Regional Water Quality Control Board (for more information, please see responses to Comments D.3-8 and D.3-9). The mitigation measures include the implementation of hydromodification control Best Management Practices (BMPs) that meet Los Angeles County LID standards and ensure that, for a capital storm event, there is no increase in peak discharge rates and no increase in runoff volume offsite compared with peak discharge rates and runoff volumes under existing, pre-development conditions. The Draft EIR requires that the Project implement MMs 4-1 and 4-2 to reduce potential water quality impacts to less than significant levels. Hydrology and flood control MMs 4-3 and 4-4 have been added to the water quality mitigation required for the Project at the request of the Lahontan Regional Water Quality Control Board (for more information, please see responses to Comments D.3-12 and D.3-13). The implementation of these mitigation measures will reduce potential Project runoff impacts to less than significant levels. Potential hydrology and flood impacts to Quail Lake are discussed on Draft EIR page 5.2-25, which states that no receiving channels will receive Project development area runoff discharges under developed conditions in the Quail Lake drainage area, which includes the lake. Potential water quality impacts to Quail Lake are discussed on Draft EIR page 5.4-68, which states that no runoff from Project developed areas will occur in the Quail Lake watershed, which includes the lake. Consequently, no runoff from Project developed areas will flow to or occur within Quail Lake and the Quail Lake drainage and watershed will not affect the hydrology, flood or water quality conditions in the lake and the lake's watershed and drainage system.

Response to Comment G.13-9:

The comment and the opinions are noted. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

From: Jodie Sackett <jsackett@planning.lacounty.gov>
Sent: Monday, July 24, 2017 10:38 AM
To: 'WILLIAMS, PAUL G GS-13 USAF AFOTEC Det 5/DTS'
Subject: RE: Centennial info request

Hello Paul, sorry you're getting this a bit late, I was out of the office last week. Note also on the below page (at top, "revised notice") we extended the comment period an extra 30 days to Wed, Aug 16, 2017.

http://planning.lacounty.gov/case/view/specific_plan_no_02_232_centennial_specific_plan

Jodie Sackett
Zoning Permits N^

-----Original Message-----
From: WILLIAMS, PAUL G GS-13 USAF AFOTEC Det 5/DTS [mailto:paul.williams.53@us.af.mil]
Sent: Tuesday, July 18, 2017 3:38 PM
To: Jodie Sackett <jsackett@planning.lacounty.gov>
Subject: Centennial info request

Ms. Sackett,

I was given you name as a source of information for the Centennial project in the Western Antelope Valley. Could you please send me a link to the EIR? G.14-1

Respectfully,

Paul

//SIGNED//
Paul G. "Greg" Williams, GS-13, DAF
AFOTEC Det 5/DTS
190 S. Wolfe Ave
Edwards AFB, CA 93524

Comm: 661-277-6812
DSN: 527-6812
CELL: 661-802-3137
FAX: 661-277-6950

Response to Comment Letter G.14
Paul G. "Greg" Williams
July 18, 2017

Response to Comment G.14-1:

Thank you for your comment and for your participation in this public process. This comment does not raise a specific concern regarding the content of the Draft EIR. Rather, it requests the Lead Agency to email the Commenter a link to the Draft EIR. The Lead Agency responded to this comment by email dated July 24, 2017 with a link to the Lead Agency's website for the project, from which the Draft EIR may be downloaded. This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required as the request to be included in the Project notification was accepted.

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RECEIVED
By KB Email at 2:49 pm, Jul 26, 2017

From: Colleen Boye [mailto:colleen.boye@gmail.com]
Sent: Wednesday, July 26, 2017 10:18 AM
To: Barger, Kathryn
Subject: Centennial development

Please do not allow Tejon Ranch to build the Centennial development in Antelope Valley. We don't need the traffic, pollution, and urban sprawl that a big development far away from jobs and the city center will create. Instead we must focus on building efficient housing within the city where the jobs are and creating the public transportation and infrastructure to support it and relieve overcrowding and congestion. G.15-1

Thank you,
Colleen Boye
Altadena, CA

Response to Comment Letter G.15
Colleen Boye
July 26, 2017

Response to Comment G.15-1:

Thank you for your comment and for your participation in this public process. This comment's assertion that the Project would destroy the character of the region is contrary to the Project's objectives and design features, which protect the rural character of the region, promote "smart growth," and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[2991] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[2992] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[2993]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[2994] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[2995] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[2996] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[2997] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[2998]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-

2991 DRP 2015, pp. 1-2
2992 *Id.*, p. 1-5
2993 *Id.*, p. 1-6
2994 *Id.*, p. 1-5
2995 *Ibid*.
2996 *Id.*, p. 1-6
2997 *Id.*, p. 1-7
2998 *Ibid*.

oriented commercial uses.[2999] Rural Town Areas serve as transition area between Rural Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[3000] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[3001]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[3002] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[3003] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[3004]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[3005] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[3006] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

2999 *Ibid*.
3000 *Ibid*.
3001 *Ibid*.
3002 DRP 2017, p. 4-4
3003 DRP 2015, p. I-8
3004 *Ibid*.
3005 *Id.*, p. I-8
3006 *Ibid*.

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-240 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[3007] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[3008] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[3009]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[3010] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016-2040 RTP/SCS.[3011] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[3012] This would be made through the operation of low or no emission transportation systems by 2040. The 2016–2040 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[3013] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016–2040 RTP/SCS,[3014] are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016–2040 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project

3007 DRP 2017, pp. 5.8-73; 5.9-23, 27, 31, 33; 5.10-141, 142; 5.11-75; 5.21-85
3008 *Id.,* p. 4-7
3009 *Ibid*.
3010 *Id.,* p. 4-8
3011 *Ibid*.
3012 *Ibid*.
3013 *Ibid*.
3014 SCAG 2016a

"exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the [South Coast Air] Basin." (See Comment D.4-2)

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[3015] The TRCRWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[3016] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

This comment does not raise any concerns regarding specific environmental effects of the Project or the adequacy of the Draft EIR. The Project's potential environmental effects related to traffic, air quality, and land use are analyzed in Sections 5.10, 5.11, and 5.8 of this EIR, respectively. This comment will be provided to the Regional Planning Commission and Board of Supervisors for consideration

[3015] DRP 2017, p. 4-45
[3016] *Ibid*.

Jodie Sackett, AICP
Zoning Permits North
Dept. of Regional Planning
320 W. Temple St., Rm. 1348
Los Angeles, CA 90012.

Dear Ms. Sackett -

As a resident of Pine Mountain Club for several years and then a resident of Frazier Park for the last 28 years, I would like to offer my comments on the Tejon Ranch Company's construction of a major new community not far from here.

For more than a decade, I have watched the Centennial team proactively reach out to the surrounding communities, giving updates on the progress of the project. They have presented to numerous Town Councils, hosted workshops where they have reviewed every aspect of the project, and sought input from the community.

Centennial is an enormous project but is obviously a meticulously planned and a carefully laid-out combination of economic opportunity and environmental preservation which will benefit the County financially and enhance it's reputation for conscientious protection of our environment.

I urge the Planning Department to move quickly to approve the project - the sooner construction starts the sooner we will begin to reap the economic and enviromental benefits,

G.16-1

Sincerely,

Larry E. Brown

Larry E. Brown
501 Wyoming Trail
Frazier Park, CA 93226

Responses to Comment Letter G.16
Larry Brown
August 10, 2017

Response to Comment G.16-1:

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

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Jodie Sackett, AICP
Zoning Permits North
Dept. of Regional Planning
320 W. Temple St., Rm. 1348
Los Angeles, CA 90012.

Dear Ms. Sackett:

As residents of Frazier park for the last 30 years we greatly value living in a rural mountain community and therefore are very sensitive to any threats to that lifestyle. But that does not mean we are adverse to improvements - and the proposed community of Centennial will bring many benefits which far outweigh any threat.

We have watched very carefully as the plans for Centennial were developed, examined, revised, and then each year as they were refined and revised again, to it's present state of a master planned, self-sustaining community where families can live and work in a community that is both environmentally sound and economically favorable.

During buildout Centennial will provide thousands of construction jobs and when completed will bring 30,000 permanent jobs to this area. The plan includes land use and zoning for residential, commercial, and light industrial development, but is what is important to us and future generations is the significant amount of conserved open space.

We deeply appreciate the careful research and planning that Tejon Ranch Corporation has put into this project and believe that the completed community of Centennial provide major benefits to nearby residents.

G.17-1

Sincerely,

Candace Huskey

Candace Huskey
500 East End
Frazier Park, CA 93225

Response to Comment Letter G.17
Candace Huskey
August 10, 2017

Response to Comment G.17-1:

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

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From: Richard Smith <gvre@gvre.com>
Sent: Wednesday, August 16, 2017 11:57 AM
To: Jodie Sackett
Cc: kbarger@bos.lacounty.gov; Centennial@Tejonranch.com
Subject: Centennial at Tejon Ranch

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

RE: CENTENNIAL AT TEJON RANCH - SUPPORT

Dear Mr. Sacket:

I am writing to show my support for the Centennial at Tejon Ranch. This master-planned community offers a wide array of housing, business park and office, commercial, schools, parks, natural open space, cultural and public uses on approximately 12,323 acres.

There are a few features that I would like to point out to reiterate why Centennial is a much-needed community:

- Centennial is the implementation of the Antelope Valley Area Plan, by creating an environmentally and economically sustainable community to help accommodate planned regional population and economic growth.
- The project will include employment and institutional land use to reduce off-site employment-related commuter trips.
- There will be 4 fire stations, a sheriff station, public library, one K-5, 5 K-8, and 1 high school, and land set aside for medical facilities.

G.18-1

Currently, local residents are forced to wait for medical/emergency services to make their way from Santa Clarita or the Antelope Valley. With the approval of Centennial, their first action is to put in a full-service sheriff station for the community.

Centennial is designed to be a sustainable, self-contained community. It embraces the smart-growth principles that are highly needed in Los Angeles County, and the Antelope Valley.
With over 20,000 permanent jobs, Centennial is the community that we have been waiting far too long for. We are asking the Regional Planning Commission to approve Centennial and allow the developers to move to the next stage.

Sincerely,

Richard Smith, Broker/President
Golden Valley Real Estate
a division of Golden Valley Real Estate, Inc.
BRE License #01494534
Office: (661) 724-0000
Cell: (661) 803-7610
Fax: (661) 724-0212
web site: http://secure-
web.cisco.com/1H5xKshmuMUx3tvCl_fE_8yxh9WgfxLn_tMK4bMGBtJ4NVaF6peLBlZkVCvuev5sGDrtpIFkSjEMiWc1YJCgXvNX
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SOUA2xcKJp432esQOZ7HUiPWcxxR5-M17iWzBkw7o_RcPtAef7g/http%3A%2F%2Fwww.gvre.com
email: gvre@gvre.com

Response to Comment Letter G.18
Richard Smith
August 16, 2017

Response to Comment G.18-1:

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

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From: Dddyasd@aol.com
Sent: Wednesday, August 16, 2017 1:38 PM
To: Jodie Sackett
Cc: kbarger@bos.lacounty.gov; Centennial@Tejonranch.com
Subject: Centennial

To who this may concern:

I firmly believe Centennial is one of the best things that will happen to Antelope Valley, Santa Clarita Valley and the San Joaquin Valley Bakersfield area.

This project will have state of the art planning from the ground up and will be equal distant to Santa Clarita, Bakersfield, Lancaster, Palmdale and Rosamond. This is fresh and very much desired in my opinion....cannot be built soon enough to alleviate over crowding in other areas.

Donald M. Days Jr.
661-256-4828
805-358-0398

PS Ms. Barger....I am not a resident of L.A. County but am a property owner there, you have made a very big impression on me, good luck!

G.19-1

Response to Comment Letter G.19
Donald M. Days Jr.
August 16, 2017

Response to Comment G.19-1:

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

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From: Robert Buchanan <rbuchanan@buchananspokes.com>
Sent: Wednesday, August 16, 2017 1:55 PM
To: Jodie Sackett
Subject: Centennial

Hello Mr. Sackett,

I am a property owner in the Lake Hughes area. I am writing to you to express my support for the development of Centennial .

Services and materials are so far away from us currently. The quality of life would be greatly improved for the area when Centennial can move forward.

G.20-1

Thank You for your consideration, Robert Buchanan

Response to Comment Letter G.20
Robert Buchanan
August 16, 2017

Response to Comment G.20-1:

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

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From: Judy <jcscoper@sbcglobal.net>
Sent: Wednesday, August 16, 2017 2:05 PM
To: Jodie Sackett
Cc: centennial@tejonranch.com
Subject: Centennial Support Letter

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

RE: CENTENNIAL AT TEJON RANCH - SUPPORT

Dear Mr. Sacket:

I am writing to show my support for the Centennial at Tejon Ranch. This master-planned community offers a wide array of housing, business park and office, commercial, schools, parks, natural open space, cultural and public uses on approximately 12,323 acres.

There are a few features that I would like to point out to reiterate why Centennial is a much-needed community:

- Centennial is the implementation of the Antelope Valley Area Plan, by creating an environmentally and economically sustainable community to help accommodate planned regional population and economic growth.
- The project will include employment and institutional land use to reduce off-site employment-related commuter trips.
- There will be 4 fire stations, a sheriff station, public library, one K-5, 5 K-8, and 1 high school, and land set aside for medical facilities.

Currently, local residents are forced to wait for medical/emergency services to make their way from Santa Clarita or the Antelope Valley. With the

G.21-1

approval of Centennial, their first action is to put in a full-service sheriff station for the community.

Centennial is designed to be a sustainable, self-contained community. It embraces the smart-growth principles that are highly needed in Los Angeles County, and the Antelope Valley.

With over 20,000 permanent jobs, Centennial is the community that we have been waiting far too long for. We are asking the Regional Planning Commission to approve Centennial and allow the developers to move to the next stage.

G.21-1 cont.

Response to Comment Letter G.21
Judy
August 16, 2017

Response to Comment G.21-1:

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

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From: Lori - Pacific <lori@pacificprinting.com>
Sent: Wednesday, August 16, 2017 2:08 PM
To: Jodie Sackett
Cc: kbarger@bos.lacounty.gov; Centennial@Tejonranch.com
Subject: Request for Centennial Support Letter

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

RE: CENTENNIAL AT TEJON RANCH - SUPPORT

Dear Mr. Sacket:

I am writing to show my support for the Centennial at Tejon Ranch. This master-planned community offers a wide array of housing, business park and office, commercial, schools, parks, natural open space, cultural and public uses on approximately 12,323 acres.

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- The project will include employment and institutional land use to reduce off-site employment-related commuter trips.
- There will be 4 fire stations, a sheriff station, public library, one K-5, 5 K-8, and 1 high school, and land set aside for medical facilities.

G.22-1

Currently, local residents are forced to wait for medical/emergency services to make their way from Santa Clarita or the Antelope Valley. With the approval of Centennial, their first action is to put in a full-service sheriff station for the community.

Centennial is designed to be a sustainable, self-contained community. It embraces the smart-growth principles that are highly needed in Los Angeles County, and the Antelope Valley.
With over 20,000 permanent jobs, Centennial is the community that we have been waiting far too long for. We are asking the Regional Planning Commission to approve Centennial and allow the developers to move to the next stage.

Thank you for reviewing this letter,

Mike Murphy
Frazier Park, CA resident

Virus-free. www.avg.com

Response to Comment Letter G.22
Mike Murphy
August 16, 2017

Response to Comment G.22-1:

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

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From: Dale King <daleking@wildblue.net>
Sent: Wednesday, August 16, 2017 4:49 PM
To: Jodie Sackett
Subject: Fwd: Letter

From: "bob smith" <duxrcool048@yahoo.com>
To: "Dale King" <daleking@wildblue.net>
Sent: Wednesday, August 16, 2017 3:06:36 PM
Subject: Letter

Dear Mr. Sacket:

I am writing to show my support for the Centennial at Tejon Ranch. This master-planned community offers a wide array of housing, business park and office, commercial, schools, parks, natural open space, cultural and public uses on approximately 12,323 acres.

There are a few features that I would like to point out to reiterate why Centennial is a much-needed community:

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- The project will include employment and institutional land use to reduce off-site employment-related commuter trips.
- There will be 4 fire stations, a sheriff station, public library, one K-5, 5 K-8, and 1 high school, and land set aside for medical facilities.

G.23-1

Currently, local residents are forced to wait for medical/emergency services to make their way from Santa Clarita or the Antelope Valley. With the approval of Centennial, their first action is to put in a full-service sheriff station for the community.

Centennial is designed to be a sustainable, self-contained community. It embraces the smart-growth principles that are highly needed in Los Angeles County, and the Antelope Valley.
With over 20,000 permanent jobs, Centennial is the community that we have been waiting far too long for. We are asking the Regional Planning Commission to approve Centennial and allow the developers to move to the next stage.

Response to Comment Letter G.23
Bob Smith
August 16, 2017

Response to Comment G.23-1:

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

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From: beatrili0118@yahoo.com
Sent: Friday, July 07, 2017 10:06 AM
To: Jodie Sackett
Subject: Re: Automatic reply: Reject Tejon's Centennial Project

He Jodie

Have a good holidays..Birth of America Month .
Thank youenjoy weekend

G.24-1

Always

Beatriz

On Jul 7, 2017 9:40 AM, Jodie Sackett wrote:

> I am currently out of the office and will return on Tuesday, July 11, 2017.

Responses to Comment Letter G.24
Beatriz
July 7, 2017

Response to Comment G.24-1:

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

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From: jack mcghee <jackmcghee007@gmail.com>
Sent: Friday, July 07, 2017 12:12 PM
To: Jodie Sackett
Subject: Re: Automatic reply: Reject Tejon's Centennial Project

Sign me on...thank you for all you do...👉😎✌😎 G.25-1

On Jul 7, 2017 12:02 PM, "Jodie Sackett" <jsackett@planning.lacounty.gov> wrote:

> I am currently out of the office and will return on Tuesday, July 11, 2017.

Responses to Comment Letter G.25
Jack McGhee
July 7, 2017

Response to Comment G.25-1:

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

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From: GER <gfconroy@yahoo.com>
Sent: Friday, July 07, 2017 5:35 PM
To: Jodie Sackett
Subject: Re: Automatic reply: Reject Tejon's Centennial Project

I support Tejon Ranch in their efforts to accommodate all stakeholders in the County.Their diligence in accommodating all parties interests is evident in the last 20+years they have surrendered 90% of the Ranch to the environmental community.STOP the MADNESS approve the Centennial project the cost of housing has been driven to unattainable levels because of hoops to jump through to satisfy the impossible hurdles created by LA County

G.26-1

On Friday, July 7, 2017, 5:26:41 PM PDT, Jodie Sackett wrote:

I am currently out of the office and will return on Tuesday, July 11, 2017.

Responses to Comment Letter G.26
GF Conroy
July 7, 2017

Response to Comment G.26-1:

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

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From: Ashley Hillard <ashleyj.hillard@yahoo.com>
Sent: Thursday, July 20, 2017 12:42 PM
To: Jodie Sackett
Subject: Auto Response: Automatic reply: Reject Tejon's Centennial Project

Follow Up Flag: Follow up
Flag Status: Completed

My new email address is ashleyhillard7@gmail.com

G.27-1

Responses to Comment Letter G.27
Ashley Hillard
July 20, 2017

Response to Comment G.27-1:

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

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From: Nick Jensen <nickjjensen1@gmail.com>
Sent: Friday, July 07, 2017 3:30 PM
To: Jodie Sackett
Subject: Reject Tejon's Centennial Project

Dear Mr. Sackett,

Tejon Ranch's Centennial Project is an example of the worst type of development. There are a myriad of reasons to categorically reject this project, but to cite a few: G.28-1

1. The project is sited far from urban centers. Los Angeles has the worst traffic in the U.S. Do we really need more than 19,000 homes situated more than an hour-long drive from Los Angeles and with no access to public transportation? G.28-2

2. The project is proposed at one of the most complex and important ecological transition zones in the state. Centennial is located in the westernmost portion of the Antelope Valley in the transition zone between the foothills of the Tehachapi Mountains and Liebre Mountains. In the reality of climate change we know that plants and animals will need transition zones such as this in order to migrate under changing conditions. This project will fragment habitats and vital wildlife corridors. G.28-3

3. Habitats on Tejon Ranch are currently unfragmented. The Centennial Project will fragment the state's largest contiguous piece of private land. Furthermore, edge effects from this development project including the introduction of invasive plants and increased human-caused wildfires will significantly cause impacts over far more than the project's reported acreage. G.28-4

4. The habitats on the Centennial Project are unique and irreplaceable. Some of the state's most extensive and intact native grasslands occur on this site, and should be preserved and managed in perpetuity as natural treasures. G.28-5

5. Scientific research on Tejon Ranch is in its infancy. As the state's single largest piece of land, Tejon has been vastly understudied by biologists. As an example of this, numerous new species of plants have recently been discovered on Tejon and doubtlessly more are waiting to be discovered. Biological surveys, even when done by well-qualified professionals, are woefully inadequate at accounting for undescribed species. More precise and detailed study of the biota on the Centennial Project is necessary. G.28-6

6. Traffic conditions on Highway 138 and Interstate 5 are already congested. The Centennial Project will only worsen these conditions. The solution to traffic congestion is not just adding lanes to existing freeways. Have we learned nothing from other development projects in Los Angeles County? G.28-7

7. The region of Tejon Ranch already suffers poor air quality. Adding more than 19,000 residences, commercial spaces, and associated vehicle traffic will only worsen these conditions. There is no way to mitigate for these effects.
Approving the Centennial Project would be a step in the wrong direction for Los Angeles County. We should strive for walkable cities, where residents live close to where they work. We deserve developments that don't add to our over-congested roadways. We should strive for development that does not decrease air quality and exacerbating the effects of climate change. G.28-8

We know that large, intact habitats are the solution to conserving plants and animal species. Now is the time to say no to Centennial, a project that will fragment habitats that are necessary to conserve plants and animals in the face of climate change. The site of the Centennial Project should be conserved in perpetuity. The Centennial Project site is not just a piece of land. It is a unique, important, and irreplaceable habitat that should be celebrated, studied and preserved. The Centennial Project should be rejected. G.28-9 G.28-10

Sincerely,
Nick Jensen

Nick Jensen

91711

Responses to Comment Letter G.28
Nick Jensen
July 7, 2017

Response to Comment G.28-1:

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

Response to Comment G.28-2:

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. Specifically, the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* and the AVAP for the purpose of sustainably accommodating regional growth projections. In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[3017] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[3018] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

The AVAP's Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development".[3019] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas (EOAs).[3020] The Project site is located entirely within the AVAP's West EOA.[3021] Per the Rural Preservation Strategy, EOAs are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[3022] During the AVAP community planning process, EOAs "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to

[3017] DRP 2015, p. I-5
[3018] *Id.*
[3019] *Id.,* p. I-7; DRP 2014a, p. 7-7
[3020] *Ibid.*
[3021] DRP 2017, p. 4-4
[3022] DRP 2015, p. I-8

[EOAs] so that the areas around them can be preserved and maintained at low density, or agricultural uses".[3023]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure".[3024] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in EOAs so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town Areas, and Rural Preserve Areas.[3025] To ensure that this strategy is implemented, the AVAP specifies that the interpretation of [AVAP] policy should be governed by the AVAP's Rural Preservation Strategy.[3026] The planning policies and environmental benefits of the Rural Preservation Strategy are closely aligned with the regional land use policies described in the 2012 and 2016 RTP/SCS documents.

As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns. Centennial's unique land use plan is designed to incorporate the main principles of "smart growth" and thus promotes compact, transit-oriented, walkable, bicycle-friendly communities.[3027] The Town Center of Centennial is located in Village 3 and is the "downtown" area of the Project. Villages 1, 2, 5, and 7 have a Village Core.[3028] Villages 6, 8, and 9 have a Neighborhood Center. As shown in Draft EIR Exhibit 4-3, Centennial Project – Villages and Core Areas, 100 percent of all residential development will be located within ¼ mile walking distance of a park, trailhead, club house or other public amenity; and an 80 percent average, but no less than 50 percent of residential units will be located within ½ mile of a Village Core or the Town Center.[3029] Village Cores will have a public gathering space (e.g., square or plaza) of 10,000 square feet or more, with street frontage on at least one side and at least two points of access from a sidewalk, trail, or other pathway.[3030] The Town Center will have a public gathering space of 1 acre or more, with street frontage on at least two sides.[3031] Additionally, 30 percent of Village 3 residential units will be within the Town Center; and 15 percent of the residential units within Villages 1, 2, 5, and 7 will be within the Village Core.[3032] High-density residential uses will be located

[3023] *Ibid.*
[3024] *Id.,* p. I-8
[3025] *Ibid.*
[3026] *Ibid.*
[3027] DRP 2017, p. 4-16
[3028] *Ibid.*
[3029] *Id.,* p. 4-17
[3030] *Ibid.*
[3031] *Ibid.*
[3032] *Ibid.*

adjacent to commercial centers and the Specific Plan's Mixed-Use Overlay areas permit residential uses in commercial centers, to further integrate residential and retail uses.[3033]

The Project also proposes to implement a community intranet system to provide easily accessible information to facilitate telecommuting and non-automotive transit mode use, further reducing demand for SOV travel.[3034] The Draft EIR also notes that sufficient facilities for non-work activities such as schools, parks, library facilities, and retail have been planned on the Project site in an effort to meet the needs of residents at buildout, reducing the need to access such services by making trips external to the Project. The purpose of this discussion is to demonstrate that, consistent with Los Angeles County and California policies, the Project has been designed to encourage local trips and to reduce incentives for trips external to the project for work, shopping and other activities. All of these design features encourage active transportation modes (e.g., walking and bicycling) and minimize use of single occupancy vehicles (SOV) for trips internal to the Project site. The updated North County Sub-Area Model used in the AVAP EIR affirmed by the Superior Court provides the estimates of Project internal trips and tripends utilized in the Draft EIR. As shown in Table 5.10-19 of the Draft EIR, the model projects that about 48 percent of the Project's total average daily trips (ADT) at buildout will be internal, and 52 percent will be external to the Project site. Accordingly, the model also projects that about 65 percent of the Project's full buildout total average daily tripends (the start or ending of a trip) will be related to trips internal to the site, and 35 percent will be related to trips that travel external to the site.

The Project's Mobility Plan proposes a multi-modal transportation system with various components (Roadways, Transit, Bicycle, and Pedestrian) and is designed to provide safe and efficient mobility throughout the community.[3035] Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies.[3036] The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, cyclists, pedestrians, and transit riders.[3037] Non-motorized transportation planning elements are also integrated into the Centennial Circulation Plan to encourage non-automotive transit modes.[3038]

The Project's Mobility Plan further requires the formation and funding of a Transportation Management Agency (TMA) prior to the issuance of the Project's first occupancy permit.[3039] The TMA is responsible for monitoring the form of travel, or transit modes, used by the people who live and work in Centennial. Consistent with state and regional transportation, air quality and greenhouse gas planning objectives that focus on reducing SOV trips, Centennial must meet the following mobility performance standards: (1) a minimum of 20 percent of total daily peak morning and afternoon external (e.g., commuting) trips must be

3033 *Id.,* p. 4-20
3034 *Id.,* p. 4-35
3035 DRP 2017, p. 4-30
3036 *Ibid.*
3037 *Id.,* p. 4-31
3038 *Ibid.*
3039 *Id.,* p. 4-30

completed by using non-SOV transit modes; and (2) a minimum of 30 percent of total daily internal (e.g., local) trips must be completed by using non-SOV transit modes.[3040]

Finally, the County and the region do need the housing units to be provided by the Project. California's housing shortage has reached crisis levels.[3041] Between 1980 and 2010, the construction of new housing units in the Los Angeles metro region fell far behind the national average.[3042] During this period, new housing construction grew by 54 percent in the typical U.S. metro area, whereas new housing units in the Los Angeles metro area grew by just 20 percent.[3043] The result has been skyrocketing housing prices. In 1970, California home prices exceeded the national average by 50 percent.[3044] By 1980, the gap had widened to 80 percent.[3045] As of 2015, the average home price in California exceeds the national average by 250 percent.[3046] California rental prices are no better. Today, the average monthly rent in California exceeds the national average by 50 percent.[3047]

Predictably, the impact of the housing crisis has been hardest on the region's most vulnerable populations. Between 1990 and 2012, poverty levels in the SCAG region have increased by 69 percent, with a quarter of all children living in poverty.[3048] In the Los Angeles metro region, approximately 30 percent of the median household's total income is used to pay housing costs, 7 percent more than the national average.[3049] However, the poorest 25 percent of Los Angeles metro area households spend, on average, 67 percent of their income on housing.[3050] As a result, these low income households are forced to spend less on other essentials. According to Harvard's Joint Center for Housing Studies, low-income households who spend more than 50 percent of their income on housing also spend 39 percent less on food than do households that spend less than 50 percent of income on housing.[3051] To seriously mitigate California's housing shortage and its disproportionate impact on low income households, California must construct 100,000 additional residential units on top of the 100,000 to 140,000 housing units the state is expected to build annually, and these units must be located almost exclusively in California's costal metro areas, including Los Angeles County.[3052]

3040 *Ibid.*
3041 California, State of, Legislative Analyst's Office (LAO). 2015. California's High Housing Costs: Causes and Consequences (p. 28). Sacramento, CA: LAO. http://www.lao.ca.gov/reports/2015/finance/housing-costs/housing-costs.pdf.
3042 *Id.,* p. 10
3043 *Ibid.*
3044 *Id.,* p. 12
3045 *Id.,* p. 3
3046 *Id.,* p. 7
3047 *Id.,* p. 12
3048 Southern California Association of Governments (SCAG). 2015 (December). Draft Environmental Impact Report for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (SCH #2015031035) (p. 3.14-13). Los Angeles, CA: SCAG. http://scagrtpscs.net/Pages/DRAFT2016PEIR.aspx.
3049 LAO 2015, p. 25
3050 *Id.,* p. 26
3051 *Id.,* p. 27
3052 *Id.,* pp. 34, 35

Response to Comment G.28-3:

Within the context of the analysis required by CEQA, the Draft EIR addressed the setting, impacts, and mitigation measures for habitat impacts including fragmentation and habitat loss,[3053] wildlife connectivity,[3054] certain predators being more likely to occur in developed areas,[3055] and invasive species avoidance and control.[3056]

It should be noted that while the Project site is within the general region of convergence of three biological regions, it does not contain this convergence within its borders. Rather, the convergence is generally occurring in the area, inclusive of on-site as well as mostly off-site lands.[3057] The geological fault line information and impacts related thereto are discuss in the Draft EIR Section 5.1, Geotechnical. In addition, although there is high biological value on portions of the Project site, much of the site has been impacted by non-native, noxious weeds such as shortpod mustard (*Hirschfeldia incana*).[3058] Similarly, riparian areas are degraded in most of the low-lying drainages. Consequently, biological diversity is less than would otherwise be expected in many areas. However, native grasslands occur in a patchy distribution throughout large portions of the site. Although grassland occurrence is also a function of soils and topography, prior site studies as discussed in the Draft EIR also attribute the patchy and uneven distribution of native grasslands on the Project site to grazing, which has potentially minimized non-native growth to a level sufficient to allow persistence of native perennial bunch grasses, as described on pages 5.7-42 through 5.7-47 of the Draft EIR. Project implementation would include mitigation actions (see Section 5.7.7, Mitigation Measures, of the Draft EIR) resulting in improved functions and values of many of these resources, in addition to preservation in perpetuity, within the 39,000-acre Centennial Mitigation Preserve as described in PDF 7-1 on page 5.7-135 of the Draft EIR.

Various regional wildlife studies have been conducted on the Project site.[3059] The conclusion of these studies has been that the sparse vegetation occurring on the Project site, coupled with the existing barriers of the California Aqueduct (both West Branch and East Branch) and Interstate 5, is not favorable for wildlife movement across the site as part of regional migration and local movement. Most wildlife using this area likely access it for water and/or to forage by crossing SR-138 from the more vegetated upland areas to the south of SR-138. Because individuals of many of the larger wildlife species in the region tend not to cross large expanses with sparse shrub cover (typical of the majority of the Project site), the central and eastern portions of the Project site are not likely to be used by the larger species to disperse between and within the regional open space areas in the site vicinity. Please note that consideration is given to major movement deterrents in the Project area, including the SR-138 and the California aqueduct, due to their substantial potential to prevent movement of some wildlife. The Aqueduct effectively serves to block east-west movement on the site for most ground-dwelling wildlife. Accordingly, passage points (some of which are bridges) are

3053 DRP 2017, 5.7-142 to -164
3054 *Id.,* pp. 5.7-164 to -170
3055 *Id.,* p. 5.7-169
3056 *Id.,* p. 5.7-167
3057 DRP 2017, pp. 5.7-50 to -64, -164 to -170
3058 *Id.,* p. 5.7-159
3059 *Id.,* Section 5.7-3, Table 5.7-2

discussed at length accordingly. SEA 17 is widely recognized as a crucial linkage area for the region and contains many undisturbed habitats. The Project has been designed to avoid direct impacts to SEA 17 completely.[3060] Also, the Project has been designed to include green space connections between undeveloped open space areas where feasible resulting in increased mobility for such species. The Project only fragments the natural open space areas within the development footprint, and these remaining pockets of open space/parkland within the footprint are not essential for the persistence of regional native wildlife populations. On the other hand, the Mitigation Preserve provides for a very large degree of connectivity and prevents future fragmentation through long-term dedication. The Project's impact on wildlife movement due to changes in mobility and habitat fragmentation is considered less than significant accordingly.[3061] Please refer to responses to Comments B.4-56, and B.4-57, for additional information and more detailed responses on this issue.

In addition, the TUMSHCP will be a major contributor to ensuring the viability of the Tehachapi Landscape linkage into the future. Through the various conditions and measures stipulated by the TUMSHCP for the various covered species, habitat for these and many additional species will be preserved and enhanced, which will promote healthy plant and wildlife communities throughout the region. Lands to be conserved as part of the TUMSHCP are adjacent to other lands within Tejon Ranch ownership and are also slated to be protected as part of the Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA). The sum of these interconnected open space commitments, development restrictions, and the measures is a conservation commitment that is, by design, consistent with conservation biology principles calling for large, interconnected blocks of habitat that support the life history requirements of Covered Species and other resident wildlife. Although the focus of the TUMSHCP is on the California condor and other species of the montane upland communities, many of the same species occur in the foothills and lowland areas as well, including the Project site. These species will benefit from the TUMSHCP, in addition to the Centennial Mitigation Preserve program described in the Draft EIR. The TUMSHCP, if fully implemented, will sustain crucial landscape linkages across cismontane Southern California.

Various mitigation measures, including the dedication of thousands of acres of open space to be preserved and managed in perpetuity, are included in Section 5.7.7, Mitigation Measures, in the Draft EIR[3062] to reduce impacts to biological resources to a less than significant level. Please refer to responses to Comments B.4-56, and B.4-57, for additional information and more detailed responses on this issue. Cumulatively considerable significant impacts are acknowledged for the biological issues of native perennial grasslands and regional wildlife movement, as discussed in Section 7.0, Cumulative Impacts, of the Draft EIR.

Response to Comment G.28-4:

With respect to habitat fragmentation, please see response to Comment G.28-3.

[3060] *Id.,* Exhibit 4-11
[3061] *Id.,* p. 5.7-166
[3062] *Id.,* pp. 5.7-173 to -194

With respect to invasive plants, Project Design Feature (PDF) 7-8 requires the preparation of a list of invasive plants species to be prohibited from use within the Project site. Although the Centennial Specific Plan includes a partial list of prohibited plants, it should be noted that any list of invasive or detrimental plants is not entirely comprehensive because many non-native species, under favorable environmental conditions, can become invasive or detrimental. For this reason, this list may be modified over time by the community forester with approval from the County staff biologist. A more exhaustive list of these plants, periodically updated by region, is published by the California Invasive Plant Council (Cal-IPC). Cal-IPC's list of invasive plants will serve as the guideline for prohibited species at Centennial.

Additionally, as stated in the Centennial Specific Plan, vegetation selected for planting shall be subject to review by the County staff biologist. Prior to selecting non-native species for use, such species should be examined to see whether they have become invasive or detrimental in other areas. Species poisonous to humans and wildlife should generally be avoided. Seed mixes for herbaceous species (ground covers including lawns or hydroseed mixes) should be certified as weed-free and not containing any of the species on the prohibited species list. Please note the inclusion of Bermuda grass on the Cal-IPC inventory. With respect to wildfire risks, the Draft EIR evaluates the Project's potential fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under the applicable thresholds of significance.[3063] This determination, however, is not reliant solely upon implementation of MM 3-9 or other mitigation measures identified in the Draft EIR. Rather, the Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9.

Phase I Environmental Site Assessments were prepared for the Project site to investigate potentially hazardous current and historic land uses that could adversely affect Project site development.[3064] Based on these reports, there are no adjacent land uses that represent fire hazards.[3065] However, as disclosed in the Draft EIR, portions of the Project site are designated by the California Department of Forestry and Fire Protection (CAL FIRE) as a VHFHSZ and as

[3063] DRP 2017, p. 5.3-39
[3064] *Id.,* p. 5.3-38
[3065] *Ibid.*

a High Fire Hazard Security Zone (HFHSZ), and the potential for wildland fire hazards would exist at the wildland/urban interface due to (a) the presence of brush; (b) increased human activity; and (c) the increased potential for fires due to accidental and arson-related causes.[3066]

CAL FIRE classifies a zone as having a moderate, high, or very high fire hazard based on a combination of how a fire will behave and the probability of flames and embers threatening buildings. As explained in the Draft EIR, current characteristics of the Project site that contribute to its hazard designation include (1) limited access, (2) lack of existing adequate fire flows, (3) topography, and (4) types of vegetative cover. These characteristics would be addressed as the Project site is developed, as discussed below.[3067]

The Drat EIR explains that Project site's limited access will be significantly improved under Project conditions. The Project would construct an extensive backbone vehicular circulation system that would provide five points of access to the site via SR-138. The design of the Project's internal circulation system would implement the County's Fire Code standards, as applicable, regarding access (e.g., roadway widths, fire hydrant placement, length of single access streets, cul-de-sac dimensions, turning radius, street parking restrictions) (see Section 5.10, Traffic, Access and Circulation, for additional discussion of roadway design; see also the Mobility Plan described in Section 3.2 of the proposed Specific Plan[3068]).

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

With respect to fire flows, the Draft EIR explains that the Project would construct a Fire Code compliant water system to support proposed land uses and provide adequate fire flows and pressure to support any fire-suppression activity in the event of wildland or structural fires (refer to Section 5.18, Water Resources, for further discussion of the water system; see also

3066 *Id.,* pp. 5.2-35. -36
3067 *Id.,* p. 5.2-35
3068 Final EIR Appendix 4.0-A.Rev

the Water Service Plan described in Section 3.5 of the proposed Specific Plan[3069]). The proposed water system includes water mains, water tanks, pump stations (where necessary), and fire hydrants to ensure sufficient fire flows and water pressure to meet County of Los Angeles Department of Public Works' and LACFD's fire-suppression standards for improved property and development. These standard requirements must be met prior to the approval of building permits; therefore, the Project would implement a water system that would meet all County requirements in support of fire-suppression activities so that less than significant water-related fire hazards would occur. Under Project conditions, fire flows at the Project site will be substantially improved as compared to existing conditions.

With regards to vegetative cover and topography, the majority of residential development is proposed for the flatter portions of the Project site. Some residential development, however, is proposed in areas that would be adjacent to large open space areas with moderate vegetative cover. Under existing conditions, the plant communities that make up this cover are highly combustible and would therefore present a high fire hazard and pose a potentially significant impact to development in these areas. As development of the Project site proceeds, however, fire hazards associated with the natural vegetative cover would be eliminated through its replacement with urban landscape vegetation, which is irrigated and less combustible than the existing vegetation.[3070] Indeed, the Project's proposed Specific Plan includes a landscaping plant palette comprised of many plant species specifically selected for their fire resistance and requires that the Project's final plant palette be approved by the LACFD.[3071]

As explained in the Draft EIR, topography is connected to wildland fire hazards because steep slopes are not only inaccessible to fire fighting vehicles, but steep canyons can create updraft conditions (much like a chimney) and a fire in a steep canyon can spread rapidly into adjacent areas.[3072] Steep canyons that are densely covered with combustible vegetation are especially hazardous. Thus, the Draft EIR explains that the potential for wildland fire hazards would still exist at the wildland/urban interface due to (a) the presence of brush; (b) increased human activity; and (c) the increased potential for fires due to accidental and arson-related causes.[3073] Generally, fire-prevention tactics for urban development in wildland fire hazard areas focus on (1) restricting the types of building materials used; (2) appropriate building design; and (3) incorporating setbacks, including fuel-modification zones.[3074] All developments within a VHFHSZ and HFHSV are required to meet the building construction requirements specified in the County Code for these areas.

The County of Los Angeles' standards that would be applied to the Project to ensure appropriate building design and materials are specified in Chapter 7A of the County Building Code (Title 26) and in the Fire Code (Title 32). The Project's proposed Specific Plan further ensures appropriate building placement and design by requiring LACFD review of all Project

3069 *Ibid.*
3070 *Id.,* p. 5.3-36
3071 *Id.,* Appendix 4.0-A, p. 3-42; Appendix 4.0-A Table 3-8
3072 *Id.,* p. 5.3-35
3073 *Id.,* p. 5.3-36
3074 *Id.,* p. 5.3-34

tentative tract maps and amendments.[3075] Moreover, to further protect against fire, the Specific Plan's General Development expressly prohibits the use of wood-burning fireplaces on the Project site.[3076] Finally, public access would be restricted in areas of the Project site that are undeveloped and contain steep slopes in accordance with the Specific Plan's Trail Plan and Open Space Management Plan.[3077] Despite limited access to the general population, those areas of the site with the greatest topographic relief would be accessible to fire-fighting equipment via helicopter, other air transport access, and existing unpaved fire roads. As required by the LACFD, upon their Project-level review (e.g., tract map review), clearance for fire access roads and gates would be incorporated into developed areas. Finally, Project implementation of the Fuel Modification Plan required by MM 3-9 would further reduce fire hazards at the wildland/urban interface.

The County Fire Department's Forestry Division (Forestry Division) provides several fire prevention services, including vegetation management services and fuel modification planning. The purpose of fuel modification is to provide defensible space between structures and wildlands. The LACFD's Fuel Modification Plan Guidelines, last revised in 2011, were created by the Forestry Division to help the public understand the process of fuel modification plan review and approval as well as set forth landscape design criteria for applicable properties located in Fire Hazard Severity Zones.[3078] Every fuel modification plan must be reviewed by the LACFD Forestry Division for defensible space, reasonable fire safety, and compliance with Sections 325.2.1, 325.2.2, 325.10, and 503.2.1 of the County Code, the Fire Department's Fuel Modification Guidelines, and California Code of Regulations Title 14, Division 1.5, Chapter 7, subchapter 2. After the plan has been approved by the Forestry Division, a signed and notarized copy of the Project Homeowners Association's approved Covenants, Conditions, and Restrictions that include the necessary fuel modification information will be recorded at the County clerk's office and a copy given to the LAFCD Fuel Modification Unit prior to site inspection and release. The fuel modification inspection ensures compliance with applicable requirements of the Fire Code, the Building Code, Section 701A.5 (Vegetation management compliance), and the Residential Code, Section R327.1.5 (Vegetation management compliance). An on-site inspection must be conducted by the LACFD Forestry Division and a final release issued by the forestry division prior to a certificate of occupancy being granted by the County building official.

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

3075 *Id.,* Appendix 4.0-A, pp. 4-12, -14
3076 *Id.,* p. 2-70
3077 *Id.,* pp. 3-88, -94
3078 *Id.,* p. 5.3-31

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

Response to Comment G.28-5:

Please see response to Comment G.28-3.

The grasslands, and the plant and wildlife species that compose them, as well as their regional value, are described in the Draft EIR.[3079] Mitigation has been included in the Draft EIR to reduce impacts to these biological resources to a less than significant level (MM 7-10).[3080] Additionally, please refer to responses to Comments A.3-3, A.3-8, B.4-18, B.4-21, B.4-24, B.4-26, B.4-29, B.4-38, B.4-39, B.4-43, B.4-58, B.4-63, F.3A-19, F.3-14, F.3-19, F.8-113, F.8-119 through F.8-125, F.8-127, F.8-128, F.8-131, F.8-141, F.8-144,F.8-146, F.8-156, F.8-158, F.8-159, F.8-163, and G.12-3, for more detailed discussions of these species. Cumulatively considerable significant impacts are acknowledged for the biological issues of native perennial grasslands and regional wildlife movement, as discussed on pages 7-15 through 7-17 in Section 7.0, Cumulative Impacts, of the Draft EIR.

As stated in MM 7-10 in the Draft EIR in Section 5.7, Biological Resources, mitigation ratios of at least 2:1 are required for grasslands.[3081] By requiring a minimum 2:1 ratio for the majority of impacted habitat, the intent is preservation of at least equal quantity of impacted habitat in the event that mitigation in some areas is unsuccessful. It is acknowledged that a net loss may occur for some species or habitats. The mitigation strategy proposed for the Project is current standard mitigation for upland vegetation types. Additionally, the intensive multi-year grassland studies have shown that grassland habitat if equal or greater value occurs in vast quantities in the current Mitigation Preserve.

It should be noted that, although much of the grassland acreage on the Project site contains a high percentage of non-native species, all grasslands impacted on the Project site are being treated as a special status habitat type and shall be mitigated for at no less than a 2:1 ratio.[3082] Furthermore, and as stated in MM 7-10 on page 5.7-181, mitigation for loss of those areas modeled as native perennial grassland will provide similar habitat quality as that which was lost. The result shall be native perennial grassland and wildflower field values that are equal to or greater than the overall ecological functions and values of those lost as a result of Project implementation.

[3079] DRP 2017, pp. 5.7-25 to -27, -40 to -47, -62, -67, -107, -111, -113 to -118, -121, -126, and -127
[3080] *Id.,* p. 5.7-180 to -182
[3081] *Id.,* p. 5.7-180
[3082] *Id.,* p. 5.7-160

Response to Comment G.28-6:

The entirety of the Project site has been evaluated for biological resources in numerous studies conducted over a 16-year period, all of which are described in Section 5.7, Biological Resources, of the Draft EIR. Third-party data, such as the scientific biological resources information developed as part of the Tejon Ranch Land Use and Conservation Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch and the Sierra Club, Natural Resource Defense Council, California Audubon Society, Endangered Habitats League, and Planning and Conservation League; the biological resource information developed and used in environmental impact reports (EIRs) for areas that include the Project site such as the Antelope Valley Area Plan EIR (Los Angeles County), the Northwest SR 138 Corridor Improvement Project EIR (Caltrans), and the Sustainable Communities Strategy EIR (SCAG); and relevant third-party scientific literature is cited in the extensive bibliography included in Section 5.7, Biological Resources, of the Draft EIR.[3083]

More specifically, with respect to the focused surveys done on the Project site and addressed in the Draft EIR, these have been conducted on the Project site since 1999 in potentially suitable habitat for the species being surveyed—an industry-wide methodology. Wildlife species generally inhabit certain habitats while avoiding others. For example, a survey for breeding tricolored blackbirds would focus on areas potentially containing their breeding habitat (marsh) and would avoid areas where no potential for that habitat occurs (oak woodland). A combination of tools such as vegetation and/or topography maps, aerial photograph, and historical knowledge of the site help biologists narrow down their survey area for a given species. Certain surveys, such as plant surveys, have been conducted comprehensively and cover the entire Project footprint.[3084] Other surveys are more general in nature, such as raptor surveys, and again in that instance the entire Project site would be surveyed. Focused surveys have been conducted in accordance with approved protocols.[3085] The various biologists studying the site since 1999 have had full access to the Project site. The diversity of the wildlife species is as expected for an extensively grazed landscape (compacted soil, invasive species) with relatively low vegetative cover over the majority of the Project site. As such, all plant and wildlife species observed or with potential to exist on the Project site based on the extensive site-specific and regional body of data is addressed in the Draft EIR. It is noted that, as appropriate under CEQA, the Draft EIR focuses on impacts associated with solely the Project site, and not the Tejon Ranch as a whole.

As neither a description of the "new species of plants" and/or "undescribed species", nor evidence of how the numerous site-specific surveys over many years are inadequate to capture the existing biological setting on the Project site are provided in this comment, no further response regarding the sufficiency of the biological resources assessment can be provided.

[3083] *Id.,* Section 5.7.9, p. 5.7-195
[3084] *Id.,* Table 5.7-2
[3085] *Id.,* Appendix 5.7-B

Response to Comment G.28-7:

Please see response to Comment G.28-2.

The proposed Project does not include widening existing freeways. The California Department of Transportation (Caltrans) has proposed the Northwest State Route 138 Corridor Improvement Project ("NW SR-138 project"), separately from and regardless of, the Centennial Project. The NW SR-138 project was determined by Caltrans to be needed with or without the Project. Conversely, the Draft EIR is also fully consistent with Caltrans' analysis of the need to improve SR-138 under forecasted cumulative conditions with or without the Project, including the NW SR-138.

To reiterate response to Comment G.28-2, as designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns. Centennial's unique land use plan is designed to incorporate the main principles of "smart growth" and thus promotes compact, transit-oriented, walkable, bicycle-friendly communities.[3086] The Town Center of Centennial is located in Village 3 and is the "downtown" area of the Project. Villages 1, 2, 5, and 7 have a Village Core.[3087] Villages 6, 8, and 9 have a Neighborhood Center. As shown in Draft EIR Exhibit 4-3, Centennial Project – Villages and Core Areas, 100 percent of all residential development will be located within ¼ mile walking distance of a park, trailhead, club house or other public amenity; and an 80 percent average, but no less than 50 percent of residential units will be located within ½ mile of a Village Core or the Town Center.[3088] Village Cores will have a public gathering space (e.g., square or plaza) of 10,000 square feet or more, with street frontage on at least one side and at least two points of access from a sidewalk, trail, or other pathway.[3089]

The Town Center will have a public gathering space of one acre or more, with street frontage on at least two sides.[3090] Additionally, 30 percent of Village 3 residential units will be within the Town Center; and 15 percent of the residential units within Villages 1, 2, 5, and 7 will be within the Village Core.[3091] High-density residential uses will be located adjacent to commercial centers and the Specific Plan's Mixed-Use Overlay areas permit residential uses in commercial centers, to further integrate residential and retail uses.[3092] The Project also proposes to implement a community intranet system to provide easily accessible information to facilitate telecommuting and non-automotive transit mode use, further

3086 *Id.,* p. 4-16
3087 *Ibid.*
3088 *Id.,* p. 4-17
3089 *Ibid.*
3090 *Ibid.*
3091 *Ibid.*
3092 *Id.,* p. 4-2

reducing demand for single occupancy vehicles (SOVs) travel.[3093] The Draft EIR also notes that sufficient facilities for non-work activities such as schools, parks, library facilities, and retail have been planned on the Project site in an effort to meet the needs of residents at buildout, reducing the need to access such services by making trips external to the Project. The purpose of this discussion is to demonstrate that, consistent with Los Angeles County and California policies, the Project has been designed to encourage local trips and to reduce incentives for trips external to the Project for work, shopping and other activities. All of these design features encourage active transportation modes (e.g., walking and bicycling) and minimize use of SOVs for trips internal to the Project site. The updated North County Sub-Area Model used in the AVAP EIR affirmed by the Superior Court provides the estimates of Project internal trips and trip-ends utilized in the Draft EIR. As shown in Table 5.10-19 of the Draft EIR, the model projects that about 48 percent of the Project's total average daily trips (ADT) at buildout will be internal, and 52 percent will be external to the Project site. Accordingly, the model also projects that about 65 percent of the Project's full buildout total average daily trip-ends (the start or ending of a trip) will be related to trips internal to the site, and 35 percent will be related to trips that travel external to the site.

The Project's Mobility Plan proposes a multi-modal transportation system with various components (Roadways, Transit, Bicycle, and Pedestrian) and is designed to provide safe and efficient mobility throughout the community.[3094] Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies.[3095] The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, cyclists, pedestrians, and transit riders.[3096] Non-motorized transportation planning elements are also integrated into the Centennial Circulation Plan to encourage non-automotive transit modes.[3097]

The Project's Mobility Plan further requires the formation and funding of a Transportation Management Agency (TMA) prior to the issuance of the Project's first occupancy permit.[3098] The TMA is responsible for monitoring the form of travel, or transit modes, used by the people who live and work in Centennial. Consistent with state and regional transportation, air quality and greenhouse gas planning objectives that focus on reducing SOV trips, Centennial must meet the following mobility performance standards: (1) a minimum of 20 percent of total daily peak morning and afternoon external (e.g., commuting) trips must be completed by using non-SOV transit modes; and (2) a minimum of 30 percent of total daily internal (e.g., local) trips must be completed by using non-SOV transit modes.[3099]

Please see Section 5.10, Traffic, Access, and Circulation, of the Draft EIR for a complete analysis of the Project's related potential impacts. The Project is within the boundaries of

3093 *Id.,* p. 4-35
3094 *Id.,* p. 4-30
3095 *Ibid.*
3096 *Id.,* p. 4-31
3097 *Ibid.*
3098 *Id.,* p. 4-30
3099 *Ibid.*

and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of transportation and traffic can be found in Section 5.16, Transportation and Traffic, of the AVAP EIR and Section 3.17, Transportation and Traffic, of the RTP/SCS EIR.

Response to Comment G.28-8:

Please see responses to Comments G.28-2 and G.28-7.

To reiterate, the Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. The Project site is located entirely within the AVAP's West EOA.[3100] Specifically, the Project has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* and the AVAP for the purpose of sustainably accommodating regional growth projections.

The AVAP and the associated EOA's are necessary to accommodate anticipated population growth in the Antelope Valley area. Centennial's unique land use plan is designed to incorporate the main principles of "smart growth" and thus promotes compact, transit-oriented, walkable, bicycle-friendly communities.[3101] As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns. The Draft EIR also notes that sufficient facilities for non-work activities such as schools, parks, library facilities, and retail have been planned on the Project site in an effort to meet the needs of residents at buildout, reducing the need to access such services by making trips external to the Project. The purpose of this discussion is to demonstrate that, consistent with Los Angeles County and California policies, the Project has been designed to encourage local trips and to reduce incentives for trips external to the Project for work, shopping and other activities. All of these design features encourage active transportation modes (e.g., walking

[3100] DRP 2017, p. 4-4
[3101] *Id.,* p. 4-16

and bicycling) and minimize use of single occupancy vehicles (SOV) for trips internal to the Project site.

The focus of the above discussion on reducing vehicle trips is germane to air quality because vehicle emissions are a primary contributor to criteria air pollutant emissions as well as greenhouse gas (GHG) emissions. As discussed in response to Comment G.28-2, consistent with state and regional transportation, air quality and greenhouse gas planning objectives that focus on reducing SOV trips, Centennial must meet the following mobility performance standards: (1) a minimum of 20 percent of total daily peak morning and afternoon external (e.g., commuting) trips must be completed by using non-SOV transit modes; and (2) a minimum of 30 percent of total daily internal (e.g., local) trips must be completed by using non-SOV transit modes.[3102] The updated North County Sub-Area Model used in the AVAP EIR affirmed by the Superior Court provides the estimates of Project internal trips and trip-ends utilized in the Draft EIR. As shown in Table 5.10-19 of the Draft EIR, the model projects that about 48 percent of the Project's total average daily trips (ADT) at buildout will be internal, and 52 percent will be external to the Project site. Accordingly, the model also projects that about 65 percent of the Project's full buildout total average daily trip-ends (the start or ending of a trip) will be related to trips internal to the site, and 35 percent will be related to trips that travel external to the site.

The Project's Mobility Plan proposes a multi-modal transportation system with various components (Roadways, Transit, Bicycle, and Pedestrian) and is designed to provide safe and efficient mobility throughout the community.[3103] Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies.[3104] The Project's Mobility Plan further requires the formation and funding of a Transportation Management Agency (TMA) prior to the issuance of the Project's first occupancy permit.[3105] The TMA is responsible for monitoring the form of travel, or transit modes, used by the people who live and work in Centennial.

As discussed in more detail in responses to Comments F.8-20 and F.8-193, the SCAG 2016 RTP/SCS and the KernCOG 2014 RTP/SCS, and their accompanying EIRs, take into account cumulative regional growth projections, including the Centennial, Newhall Ranch, Tejon Mountain Village and Grapevine projects, as required by CEQA and SB 375. Both plans have been reviewed by all federal, state and regional expert agencies with jurisdiction over the air basins within the planning areas of the SCAG 2016 RTP/SCS and KernCOG 2014 RTP/SCS and both plans have been determined to be in conformity with the State Implementation Plan (which incorporates all applicable Air Quality Management Plans [AQMPs]) to achieve and maintain air quality standards. This is explained in detail in the Draft EIR, with analysis specific to the applicable AQMPs and RTP/SCS documents.[3106]

3102 *Ibid.*
3103 *Id.,* p. 4-30
3104 *Ibid.*
3105 *Ibid.*
3106 *Id.,* p. 5.11-13 to -17, -74 to -75; 7-3 to -9, -20

Further, as explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[3107] The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[3108] Discussions with local jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016 RTP/SCS.[3109] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[3110] This would be made through the operation of low or no emission transportation systems by 2040. The 2016 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[3111] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016 RTP/SCS[3112], are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project "exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D.4-2).

Response to Comment G.28-9:

With respect to habitat fragmentation, please see responses to Comments G.28-3, G.28-4, and G.28-5.

To reiterate, within the context of the analysis required by CEQA, the Draft EIR addressed the setting, impacts, and mitigation measures for habitat impacts including fragmentation and habitat loss.[3113] Although there is high biological value on portions of the Project site, much of the site has been impacted by non-native, noxious weeds such as shortpod mustard (*Hirschfeldia incana*).[3114] Similarly, riparian areas are degraded in most of the low-lying drainages. Consequently, biological diversity is less than would otherwise be expected in many areas. However, native grasslands occur in a patchy distribution throughout large portions of the site which may be attributed to the grazing, which has potentially minimized non-native growth to a level sufficient to allow persistence of native perennial bunch grasses, as described on pages 5.7-42 through 5.7-47 of the Draft EIR. Project implementation would

3107 *Id.,* pp. 5.8-73; 5.9-23, -27, -31, -33; 5.10-141, -142; 5.11-75; 5.21-85
3108 *Id.,* p. 4-8
3109 *Ibid.*
3110 *Ibid.*
3111 *Ibid.*
3112 SCAG 2016a
3113 DRP 2017, pp. 5.7-142 to -164
3114 *Id.,* p. 5.7-159

include mitigation actions[3115] resulting in improved functions and values of many of these resources, in addition to preservation in perpetuity, within the 39,000-acre Centennial Mitigation Preserve as described in PDF 7-1 on page 5.7-135 of the Draft EIR.

The Project has been designed to include green space connections between undeveloped open space areas where feasible resulting in increased mobility for such species. The Project only fragments the natural open space areas within the development footprint, and these remaining pockets of open space/parkland within the footprint are not essential for the persistence of regional native wildlife populations. On the other hand, the Mitigation Preserve provides for a very large degree of connectivity and prevents future fragmentation through long-term dedication. The Project's impact on wildlife movement due to changes in mobility and habitat fragmentation is considered less than significant accordingly.[3116] Please also refer to responses to Comments B.4-36, B.4-56, B.4-57, B.4-75, F.3-23, F.3-25, F3A-32, F.5-2, F.5-3, F.5-4, F.5-5, F.5-7, F.7-22, F.8-109, F.8-110, F.8-172, and J.1-12 for a more detailed discussion of wildlife movement.

The Draft EIR, as found on pages 5.7-63 and 5.7-173, indicates that, in addition to the Centennial Mitigation Preserve, many species may benefit from the TUMSHCP and other open space conservation efforts, like the Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) and Antelope Valley Area Plan (AVAP). The biological importance of the Tejon Ranch (Ranch) property and surrounding region are recognized and reflected in the TRCRWA, as discussed in the Draft EIR on page 5.7-18, which explains that in recognition of the biological importance of Tejon Ranch, the project Applicant voluntarily agreed to permanently preserve 90 percent of the Ranch determined to be the most ecologically important, and limit Ranch development to the less than 10 percent of the Ranch determined to be developable without compromising the biological integrity and biological values. The proposed Project is located in a development area, has relatively limited impact on oak woodland and riparian habitat, and fully mitigates its impacts to grasslands.[3117] While the TRCRWA itself is not considered mitigation for the Centennial Project, the TRCRWA allows its conservation lands to be used as mitigation lands for development, and the Centennial Mitigation Preserve is within its boundaries. Collectively, these open space dedication and acquisition areas comprise approximately 240,000 acres, or approximately 90 percent, of the 270,000-acre Ranch. The open space preservation and development constraints in the TRCRWA have been recorded on title, and comprise the reasonable foreseeable land uses on the Ranch. Under the TRCRWA, the Conservancy will adopt, update, monitor and enforce implementation of the Ranch-wide Management Plan (RWMP) on dedicated conservation areas and option areas subject to conservation, preservation, mitigation, and enhancement measures, as required under applicable law or imposed by federal, State or local agencies as part of any permit or approval for the Ranch or projects within the Ranch.

In addition, the TUMSHCP will be a major contributor to ensuring the viability of the Tehachapi Landscape linkage into the future. Through the various conditions and measures

3115 *Id.,* Section 5.7.7
3116 *Id.,* p. 5.7-166
3117 *Id.,* Sections 5.7.6 and 5.7.7

stipulated by the TUMSHCP for the various covered species, habitat for these and many additional species will be preserved and enhanced, which will promote healthy plant and wildlife communities throughout the region. Lands to be conserved as part of the TUMSHCP are adjacent to other lands within Tejon Ranch ownership and are also slated to be protected as part of the TRCRWA. The sum of these interconnected open space commitments, development restrictions, and the measures is a conservation commitment that is, by design, consistent with conservation biology principles calling for large, interconnected blocks of habitat that support the life history requirements of Covered Species and other resident wildlife. Although the focus of the TUMSHCP is on the California condor and other species of the montane upland communities, many of the same species occur in the foothills and lowland areas as well, including the Project site. These species will benefit from the TUMSHCP, in addition to the Centennial Mitigation Preserve program described in the Draft EIR. The TUMSHCP, if fully implemented, will sustain crucial landscape linkages across cismontane Southern California.

Various mitigation measures, including the dedication of thousands of acres of open space to be preserved and managed in perpetuity, are included in Section 5.7.7, Mitigation Measures, in the Draft EIR[3118] to reduce impacts to biological resources to a less than significant level. Cumulatively considerable significant impacts are acknowledged for the biological issues of native perennial grasslands and regional wildlife movement, as discussed on pages 7-15 through 7-17 in Section 7.0, Cumulative Impacts, of the Draft EIR.

The comment to conserve the Centennial Project site and not approve the proposed Project is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration.

Response to Comment G.28-10:

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

[3118] *Id.,* pp. 5.7-173 to -194

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From: gerard conroy <gfconroy@yahoo.com>
Sent: Friday, July 07, 2017 5:26 PM
To: Jodie Sackett
Subject: Reject Tejon's Centennial Project

Dear Mr. Sackett,

Tejon Ranch's proposed Centennial new city is a small accommodation for the surrendering of over 90% of their Land. Housing will never be affordable in LA until such time as THE WEALTHY west siders relinquish control over regional planning.I support Tejon Ranch and their responsible approach to the Centennial community as a bellwether for the new millennium. G.29-1

gerard conroy

93536

Responses to Comment Letter G.29
Gerard Conroy
July 7, 2017

Response to Comment G.29-1:

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

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From: Sierra Alder <Bean4042@yahoo.com>
Sent: Sunday, July 09, 2017 2:04 PM
To: Jodie Sackett
Subject: Reject Tejon's Centennial Project

Dear Mr. Sackett,

i am writing to ask you to please reject and deny the Centennial project. Instead, please preserve and protect the native landscape as is. It is the right thing to do. G.30-1

Sincerely

Sierra Alder

93023

Responses to Comment Letter G.30
Sierra Alder
July 9, 2017

Response to Comment G.30-1:

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

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Dear Mr. Sackett,

Tejon Ranch's proposed Centennial new city is a bad idea for Los Angeles County and should be rejected. Installing a new city in the middle of the last, best native grassland in the state of California -- far from job centers, public services and transportation -- is a project that has no place in today's smart-planning world.

The mega-development will result in significant increases in air pollution in already bad air basins. It will dump additional commuter traffic onto Interstate 5, exacerbating traffic and pollution. It will create unnecessary carbon pollution due to the location's remoteness and reliance on uncertain promises that multimodal transportation will be provided.

Los Angeles County should celebrate and protect the site's native grasslands and wildflower fields as the treasures that they are -- a natural legacy to be preserved for future generations. Maintaining the rural nature of the area will also protect the unique plants and animals that call this area home, and preserve the wildlife movement corridors that are essential for climate-change adaptation.

I urge the county to reject the ill-conceived Centennial project and instead designate the site for open space and conservation.

G.31-1

Thank you,

Responses to Comment Letter G.31
Form Letter 1
Various Dates

Response to Comment G.31-1:

A form letter was prepared by an unknown source and was made available to the public for submittal via email. A total of 1,594 form letters were submitted via email. Of the 1,594 form letters submitted, 73 were duplicate form letter submissions. Within this form letter, commenters were encouraged to sign with their name as well as their zip code. Based on this information, the geographic breakdown of the remaining form letter commenters is as follows:

1. 19 commenters within the Antelope Valley;
2. 1,098 commenters outside of the Antelope Valley, but within Los Angeles County;
3. 33 commenters within Kern County;
4. 253 commenters outside of Los Angeles and Kern Counties, but within California;
5. 95 commenters outside of California;
6. 12 commenters outside of the United States; and
7. 11 commenters with no zip code or an unrecognized zip code.

The individual form letters can be found in Appendix A-1 of this Final EIR. The response to this form letter is as follows. Thank you for your comment and for your participation in this public process. This comment's characterization of the proposed Project is contrary to the Project's objectives and design features, which promote "smart growth" and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

The AVAP was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[3119] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[3120] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[3121]

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[3122] At these community meetings, area residents and other

[3119] DRP 2015, p. I-2
[3120] *Id.*, p. I-5
[3121] *Id.*, p. I-6
[3122] *Id.*, p. I-5

stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[3123] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

"The AVAP's Rural Preservation Strategy addresses issues of Valleywide significance in a manner that builds upon the communities' vision statement."[3124] The Rural Preservation Strategy is based on four types of environments that serve different purposes but collectively "preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development."[3125] These four environments include: Rural Town Centers; Rural Town Areas; Rural Preserve Areas; and Economic Opportunity Areas.[3126]

Pursuant to the Rural Preservation Strategy, Rural Town Centers serve as the focal point of low-density communities served by locally-oriented public facilities and new locally-oriented commercial uses.[3127] Rural Town Areas serve as transition area between Rural Town Centers and Rural Preserve Areas and are occupied by a mix of low-density residential and light agricultural uses.[3128] Rural Preserve Areas are located outside of Rural Town Centers and area largely undeveloped, are generally unserved by existing or planned infrastructure and public facilities, and contain environmental resources, including Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas.[3129]

The Project site is located entirely within the AVAP's West Economic Opportunity Area.[3130] Per the Rural Preservation Strategy, Economic Opportunity Areas are defined clusters of land located along two new proposed major infrastructure projects in the AVAP planning area – i.e., the High Desert Corridor and the Northwest 138 Corridor Improvement Project.[3131] During the AVAP community planning process, Economic Opportunity Areas "were identified as having tremendous potential for economic growth" and, per the Rural Preservation Strategy, major development in the AVAP "should be guided to these areas so that the areas around them can be preserved and maintained at low density, or agricultural uses."[3132]

Thus, the community vision embodied in the AVAP "necessitates a 'trade-off' between preserving rural character and developing additional infrastructure."[3133] As stated by the AVAP's Rural Preservation Strategy, this "trade-off" entails "maximiz[ing]" development in Economic Opportunity Areas so as to generate property tax revenues and developer fees needed to help fund new infrastructure and public facilities needed to serve the AVAP planning area without sacrificing the rural character of Rural Town Centers, Rural Town

3123 *Ibid.*
3124 *Id.*, p. I-6
3125 *Id.*, p. I-7
3126 *Ibid.*
3127 *Ibid.*
3128 *Ibid.*
3129 *Ibid.*
3130 DRP 2017, p. 4-4
3131 DRP 2015, p. I-8
3132 *Ibid.*
3133 *Id.*, p. I-8

Areas, and Rural Preserve Areas.[3134] To ensure that this strategy is implemented, the AVAP specifies that "[t]he interpretation of [AVAP] policy should be governed by the Vision and Rural Preservation Strategy of the Antelope Valley Area Plan."

To promote implementation of the AVAP's Rural Preservation Strategy, the AVAP's Land Use Goals and Policies direct the majority of the Antelope Valley's projected growth to Economic Opportunity Areas. (See AVAP Policies LU 1-1, 4-1.) Indeed, while it is a goal of the AVAP to ensure a land use pattern that protects environmental resources (see AVAP Goal LU 2), the AVAP policies adopted to implement such goal expressly exclude Economic Opportunity Areas, as do all other AVAP land use policies that affirmatively limit or otherwise restrict the amount of potential development within the AVAP. (See AVAP Policies LU 2.2 through LU 2.2, and LU 3.1 through 3.7.) All of these AVAP policies thus promote the Rural Preservation Strategy's expressly stated "trade-off" that requires "maximiz[ing]" opportunities for development within Economic Opportunity Areas so as to preserve the rural character of Antelope Valley outside of the Economic Opportunity Areas.

The Commenter's claim is contrary to the Project's objectives and design features, which implement the AVAP's Rural Preservation Strategy by focusing regional development in an area that can accommodate projected future growth with a balance homes and jobs along a major transportation corridor and away from rural areas less suitable for future development. As designed, the Project would reduce reliance on single-occupancy vehicles by creating a series of mixed-use villages linked by streets, transit, and pedestrian and bicycle trails. This land use pattern will provide convenient access to shopping, employment, schools, professional services and parks. Each village will contain a village core or town center comprised of high-density housing, with more intensive commercial and business park uses located closest to State Route 138 (SR-138) in order to utilize freeway exposure and support efficient transportation patterns.

As explained in Draft EIR, the Project is also consistent with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) adopted in April 2016 by the Southern California Association of Governments (SCAG).[3135] The RTP/SCS provides a plan for meeting greenhouse gas (GHG) emissions reduction targets set forth by the California Air Resources Board (CARB) through the integration of land use, housing, transportation, and environmental planning strategies.[3136] SCAG was tasked with the development of the SCS through the mandate set forth in Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), which is expected to help California reach its GHG reduction goals in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035 (from a 2005 base year).[3137]

The RTP/SCS's Integrated Growth Forecast reflects the 2010 Census, employment data from the California Employment Development Department (EDD), and population and household data from the California Department of Finance (DOF).[3138] Discussions with local

3134 *Ibid.*
3135 DRP 2017, pp. 5.8-73; 5.9-23, -27, -31, -33; 5.10-141, -142; 5.11-75; 5.21-85
3136 *Id.,* p. 4-7
3137 *Ibid.*
3138 *Id.,* p. 4-8

jurisdictions led to some adjustments, which resulted in SCAG's ability to obtain a consensus on the Integrated Growth Forecast to serve as the foundation for the 2016 RTP/SCS.[3139] The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources.[3140] This would be made through the operation of low or no emission transportation systems by 2040. The 2016 RTP/SCS includes population, household, and employment projections in Traffic Analysis Zone (TAZ) maps.[3141] TAZ projections for the area that includes the Project site, which were also reflected in corresponding figures included in 2016 RTP/SCS[3142], are consistent with the household and employment components of the Project. Thus, the Project is consistent with preferred land use scenario incorporated into the 2016 RTP/SCS, the implementation of which will help achieve the regions GHG reduction target for land use and transportation. Indeed, as recognized by the South Coast Air Quality Management District in its comment letter on the Draft EIR, the Project "exemplifies the [Lead Agency's] leadership in promoting sustainable communities development" in a manner that "will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the [South Coast Air] Basin" (see Comment D.4-2).

In addition, the proposed Project is consistent with the terms and conditions of the June 17, 2008 Tejon Ranch Conservation and Land Use Agreement (Ranch-Wide Agreement or TRCRWA) between Tejon Ranch Company (TRC), Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy (Conservancy).[3143] The TRCRWA allows TRC and its development partners to pursue approvals for development of 7,900 acres of the Tejon Ranch (Ranch) closest to existing infrastructure (e.g., I-5, SR-138) and existing development (i.e., National Cement Plant), including the Project site, without opposition from the Resource Groups, while providing for the permanent protection of approximately 90 percent of the 270,000-acre Tejon Ranch.[3144] Thus, the Project promotes regional smart growth by focusing development proximate to existing freeways and industrial uses while contributing the preservation of thousands of acres of open space and sensitive habitat.

With respect to this comment's concerns about hazards and fire safety, biological resources, transportation and traffic, air quality, and water supplies and drought please see Sections 5.3 (Fire Hazards and Safety), 5.7 (Biological Resources), 5.10 (Traffic, Access, and Circulation), 5.11 (Air Resources), and 5.18 (Water Resources) of the Draft EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments

3139 *Ibid.*
3140 *Ibid.*
3141 *Ibid.*
3142 SCAG 2016a
3143 DRP 2017, p. 4-45
3144 *Ibid.*

2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project on the topic of biological resources can be found in these documents: Sections 5.3 (Air Quality), 5.4 (Biological Resources), 5.8 (Hazards and Hazardous Materials), 5.16 (Transportation and Traffic), and 5.17 (Utilities and Service Systems) of the AVAP EIR, and Sections 3.3 (Air Quality), 3.4 (Biological Resources), 3.9 (Hazards and Hazardous Materials), 3.17 (Transportation and Traffic), and 3.18 (Utilities and Service Systems) of the RTP/SCS EIR.

Out of the 1,594 form letter submittals, 59 were modified slightly by the commenter to include additional comments. These additional comments are summarized below.

- Reject the Project.
- Developers are greedy.
- Los Angeles is overbuilt and unaffordable.
- No sprawl. The Project is far from urban centers.
- Need walkable cities and sustainable development.
- Concerns about overpopulation and population growth.
- The Project destroys habitat and wildlife and will fragment habitats.
- The Project destroys grasslands.
- Concerns about air quality, traffic, and water use.
- Concerns about wildfires and fire services.

The following responses address each of the above summarized comments.

1. Reject the Project.

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

2. Developers are greedy.

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

3. Los Angeles is overbuilt and unaffordable.

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

4. No sprawl. The Project is far from urban centers.

As discussed previously, the Project's objectives and design features promote "smart growth" and discourage sprawl by implementing the AVAP.

5. Need walkable cities and sustainable development.

As discussed previously, the Project's objectives and design features promote "smart growth" and discourage sprawl by implementing the AVAP. Specifically, Project Objective 3 includes sizing "the Project to include a broad range of employment, residential, institutional, and recreational land uses to encourage walkability and wellness, while reducing off-site employment-related commuter trips".[3145] Additionally, as stated in the Centennial Specific Plan, the Project is designed to "embrace the concepts of walkability, human-scale commercial centers, mixed uses, clustering of development, and opportunities for social interaction".[3146]

The Project includes a Green Development Program, which is intended to meet or exceed state, regional, and local requirements for energy efficiency and green building ordinances.[3147] The Centennial Green Development Program's Green Building component, found in Appendix 2-A of Appendix 4.0-A to the Draft EIR, requires all residential and non-residential development to comply with CALGreen Code Mandatory Measures, as well as the voluntary CALGreen Tier 1 measures, and to comply with the Los Angeles Green Building Ordinances.[3148] Additional measures are also included to further improve energy, water and material management conservation and efficiency, and to assure health building materials and designs. Sustainable and resiliency features will be incorporated in the design from the earliest stages through the final buildout.[3149] The Green Development Program is adopted by resolution and incorporates the County's Green Building Ordinances with respect to development for the Project Site.[3150]

6. Concerns about overpopulation and population growth.

The potential of the Project to induce substantial growth is discussed on Draft EIR pages 5.9-23 through 5.9-32, which state that substantial increases in population, housing and employment would occur with the Project and this growth would be considered significant

[3145] *Id.,* p. 4-4
[3146] *Id.,* Appendix 4.0-A, p. 2-1
[3147] *Id.*, Appendix 4.0-A, p. M-6
[3148] *Id.,* Appendix 4.0-A, p. 4 of Appendix 2-A
[3149] *Id.*, Appendix 4.0-A, p. M-6
[3150] *Id.,* p. 2-60

and unavoidable. Section 6.0, Growth Inducing Impacts, of the Draft EIR also discusses growth inducement potential and the growth inducing impacts of the Project. Again, the Project is expected to result in a significant adverse indirect growth-inducing impact. However, the Project is consistent with approved growth plans in the region, including the growth projections in the 2016 RTP/SCS and the AVAP.

7. The Project destroys habitat and wildlife and will fragment habitats.

Within the context of the analysis required by CEQA, the Draft EIR addressed the setting, impacts, and mitigation measures for habitat impacts including fragmentation and habitat loss,[3151] wildlife connectivity,[3152] predators such as feral cats being more likely to occur in developed areas,[3153] and invasive species avoidance and control.[3154]

The Project has been designed to include are green space connections between undeveloped open space areas where feasible resulting in increased mobility for such species. The Project only fragments the natural open space areas within the development footprint, and these remaining pockets of open space/parkland within the footprint are not essential for the persistence of regional native wildlife populations. On the other hand, the Mitigation Preserve provides for a very large degree of connectivity and prevents future fragmentation through long-term dedication. The Project's impact on wildlife movement due to changes in mobility and habitat fragmentation is considered less than significant accordingly.[3155]

Various mitigation measures, including the dedication of thousands of acres of open space to be preserved and managed in perpetuity, are included in Section 5.7.7, Mitigation Measures, in the Draft EIR[3156] to reduce impacts to biological resources to a less than significant level. Cumulatively considerable significant impacts are acknowledged for the biological issues of native perennial grasslands and regional wildlife movement, as discussed in Section 7.0, Cumulative Impacts, of the Draft EIR.

8. The Project destroys grasslands.

The grasslands, and the plant and wildlife species that compose them, as well as their regional value, are described in the Draft EIR.[3157] Mitigation has been included in the Draft EIR to reduce impacts to these biological resources to a less than significant level (MM 7-10).[3158] Cumulatively considerable significant impacts are acknowledged for the biological issues of native perennial grasslands and regional wildlife movement, as discussed on pages 7-15 through 7-17 in Section 7.0, Cumulative Impacts, of the Draft EIR.

3151 *Id.,* pp. 5.7-142 to -164
3152 *Id.,* pp. 5.7-164 to -170
3153 *Id.,* p. 5.7-169
3154 *Id.,* p. 5.7-167
3155 *Id.,* p. 5.7-166
3156 *Id.,* pp. 5.7-173 to -194
3157 *Id.,* pp. 5.7-25 to -27, -40 to -47, -62, -67, -107, -111, -113 to -118, -121, -126, -127
3158 *Id.,* p. 5.7-180

9. Concerns about air quality, traffic, and water use.

As addressed previously, with respect to the comment's concerns about transportation and traffic, air quality, and water supplies and drought, please see Sections 5.10 (Traffic, Access, and Circulation), 5.11 (Air Resources), and 5.18 (Water Resources) of the Draft EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project on the topic of biological resources can be found in these documents: Sections 5.3 (Air Quality), 5.16 (Transportation and Traffic), and 5.17 (Utilities and Service Systems) of the AVAP EIR, and Sections 3.3 (Air Quality), 3.17 (Transportation and Traffic), and 3.18 (Utilities and Service Systems) of the RTP/SCS EIR.

10. Concerns about wildfires and fire services.

With respect to the comment's concerns about hazards and fire safety and fire services, please see Sections 5.3 (Fire Hazards and Safety) and 5.16 (Fire and Law Enforcement Services) of the Draft EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the project area and considered on a program level, additional information that is relevant to the project on the topic of biological resources can be found in these documents: 5.8 (Hazards and Hazardous Materials) and 5.14 (Public Services) of the AVAP EIR, and 3.9 (Hazards and Hazardous Materials) and 3.15 (Public Services) of the RTP/SCS EIR.

H. Post-Closure of Review Period Comments

CENTENNIAL

at TEJON RANCH

From: Marty Kreisler <mkreisler@ca.rr.com>
Sent: Wednesday, August 16, 2017 5:43 PM
To: Jodie Sackett
Cc: kbarger@bos.lacounty.gov; Centennial@Tejonranch.com

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

SUBJECT: Centennial Support Letter

Dear Mr. Sackett:

I am writing to show my support for the Centennial at Tejon Ranch. This master-planned community reminds me a little of Valencia when it was just a vision on the drawing boards at Newhall Land. This new community will offer a wide array of housing, business park and office, commercial, schools, parks, natural open space, cultural and public uses on approximately 12,323 acres.

I know how serious and how much effort the Tejon Ranch Management has expended to make the Tejon area a showcase for environmental preservation. There are a few features that I would like to point out to reiterate why Centennial is a much-needed community:

- Centennial is the implementation of the Antelope Valley Area Plan, by creating an environmentally and economically sustainable community to help accommodate planned regional population and economic growth.
- The project will include employment and institutional land use to reduce off-site employment-related commuter trips.
- There will be 4 fire stations, a sheriff station, public library, one K-5, 5 K-8, and 1 high school, and land set aside for medical facilities.

H.1-1

Currently, local residents are forced to wait for medical/emergency services to make their way from Santa Clarita or the Antelope Valley. With the approval of Centennial, their first action is to put in a full-service sheriff station for the community.

Centennial is designed to be a sustainable, self-contained community. It embraces the smart-growth principles that are highly needed in Los Angeles County, and the Antelope Valley.

With over 20,000 permanent jobs, Centennial is the community that we have been waiting far too long for. We are asking the Regional Planning Commission to approve Centennial and allow the developers to move to the next stage.

Thank you for your consideration,

Sincerely,

Martin Kreisler
Resident, Castaic, Ca.

Response to Comment Letter H.1
Marty Kreisler
August 16, 2017

Response to Comment H.1-1:

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

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From: henry wahl <hwahl234@gmail.com>
Sent: Wednesday, August 16, 2017 6:27 PM
To: Jodie Sackett
Subject: Centeniel

I support this project. We need it badly H.2-1

Sent from my iPhone

Response to Comment Letter H.2
Henry Wahl
August 16, 2017

Response to Comment H.2-1:

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

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From: Anne (aka Weber) Burnaugh <healthystart@frazmtn.com>
Sent: Monday, August 21, 2017 3:00 PM
To: Jodie Sackett
Cc: kbarger@bos.lacounty.gov; Centennial@Tejonranch.com
Subject: Centennial project

August 21, 2017

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

RE: CENTENNIAL AT TEJON RANCH - SUPPORT

Dear Mr. Sacket:

Thank you for your time today. I would like to provide you with my thoughts regarding the Centennial project at Tejon Ranch. I have lived in the Tejon Ranch/mountain area for nearly 30 years and it always surprises me that there has been little progress in our area.

I support the well planned community and what it will offer it residents and surrounding areas like Gorman, Frazier Park, as well as the Antelope Valley area residents themselves. There is much need for employment and economic growth with businesses, schools, sheriff, and fire stations. Many of our local residents in the Frazier Park area are forced to move into the city where they are closer to much needed medical facilities. Even families move from our rural area because of lack of jobs and other needed services.

Over the past 20 years, I have been involved in the local community needs as a Director of the Mountain Communities Family Resource Center and have found that families thrive when they have the opportunities that Centennial will provide. The Centennial project will enhance the area with its sustainable, self-contained community. I am asking the Regional Planning Commission to approve the Centennial and allow the developers to move to the next stage.

H.3-1

Thank you,

Anne Burnaugh
5416 Frazier Mountain Park Road
Frazier Park, CA 93225

Virus-free. www.avg.com

Response to Comment Letter H.3
Anne Burnaugh
August 21, 2017

Response to Comment H.3-1:

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

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From: Richard Despain <richard.despain@gmail.com>
Sent: Monday, August 28, 2017 9:43 AM
To: Jodie Sackett; kbarger@bos.lacounty.gov; Centennial@tejonranch.com; Tamira Palmetto-Despain
Subject: CENTENNIAL AT TEJON RANCH - SUPPORT

Dear Mr. Sacket,

I am writing to show my support for the planned community at Centennial,Tejon Ranch. This master-planned community offers multi-use and much needed housing, business and office, commercial, schools, parks, natural open space, cultural and public uses on approximately 12,323 acres.

The Centennial project is a much-needed community in this region for many reasons, some of the biggest are;

A planned community that implements controlled growth of development unlike the neighboring cities of Los Angeles and the San Fernando Valley. Pre-planning is always the best design. I fully agree with other points made by the Tejon Development team such as:

- "Centennial is the implementation of the Antelope Valley Area Plan, by creating an environmentally and economically sustainable community to help accommodate planned regional population and economic growth".
- "The project will include employment and institutional land use to reduce off-site employment-related commuter trips".
- "There will be 4 fire stations, a sheriff station, public library, one K-5, 5 K-8, and 1 high school, and land set aside for medical facilities". H.4-1

My wife and I had to call the sheriff for a break-in and theft on our property, it took over two hours for the deputy to arrive! Currently, local residents are forced to wait for medical/emergency services to make their way from Santa Clarita or the Antelope Valley. With the approval of Centennial, their first action is to put in a full-service sheriff station for the community.

Centennial is designed to be a sustainable, self-contained community. It embraces the smart-growth principles that are highly needed in Los Angeles County, and the Antelope Valley._With a projected growth of over 20,000 permanent jobs, Centennial is the community that we have been waiting far too long for. We are asking the Regional Planning Commission to approve Centennial and allow the developers to move to the next stage.

Southern California is big and growing. Citizens, families, and the impending growth of our population are depending on the State, County and local governments to be proactive in the region.

Sincerely,

Richard & Tamira

--

G. Richard DeSpain
2108 Dallin Street
Lancaster, CA 93536
Cell 518-477-2012

Responses to Comment Letter H.4
Richard and Tamira Despain
August 28, 2017

Response to Comment H.4-1:

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

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TEJON
INDIAN TRIBE

February 14th, 2018

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

RE: CENTENNIAL AT TEJON RANCH - SUPPORT

Dear Mr. Sacket:

I am writing to express my full support for Centennial at Tejon Ranch. It is designed to be a self-sustained community where people can live and work without having to commute long distances.

Tejon Ranch has worked side-by-side with our tribe to ensure the history behind the Ranch is not lost. From establishing conservation areas to using environmentally sensitive practices in ranching, farming, and real estate, Tejon Ranch is committed conservation.

As you know, in May of 2008 Tejon Ranch reached an agreement with five environmental resource organizations, the Sierra Club, NRDC, California Audubon, Planning and Conservation league, and Endangered Habitats League, to announce the ranch wide agreement, which resulted in the permanent conservation of up to 90% of the Ranch's land.

This led to the formation of the Tejon Ranch Conservancy. Centennial has always put an emphasis on the protection of open spaces and has taken significant steps to ensure protection of the biodiversity of the surrounding space.

We are asking the Regional Planning Commission to approve Centennial and allow the developers to move to the next stage.

H.5-1

Sincerely,

Octavio Escobedo, Chairman
Tejon Indian Tribe

cc: Hon. Kathryn Barger, Supervisor 5th District

RECEIVED
APR 03 2018
BY:

Responses to Comment Letter H.5
Tejon Indian Tribe
February 14, 2018

Response to Comment H.5-1:

Thank you for your comment and for your participation in this public process. The Commenter's general support for the Project will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The Commenter does not provide comments specifically concerning the adequacy of the Draft EIR and thus no further response is required.

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RONALD M. COLITTI H.6

1136 Colina Vista
Ventura, CA 93003
(805)642-4189
Fax (805)658-6728

February 16, 2018

Jodie Sackett
Los Angeles County Planner
Los Angeles County Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

RE: Centennial City

Dear Mr. Sackett:

As owners of several pieces of property in Golden Valley where Centennial City is being planned, we would like to express our strong desire to see this project move forward.

Over the years we have lived in several areas in Southern California and have seen how the cities have deteriorated because of extremely poor planning. It is encouraging to see that there is a developer with the foresight that Tejon Ranch has brought to the Centennial City project.

I sincerely hope that whatever decisions are made by the Planning Department and the L.A. Board of Supervisors, are made based on the merit of the project and not some abstract emotional determination. We have been following the Centennial City project for quite a number of years and feel that anyone with the dedication that Tejon Ranch has shown has the best interests of Golden Valley at heart.

Tejon Ranch should certainly be praised for their perseverance in moving this project forward. If you wish us to comment further, please contact us.

H.6-1

Sincerely,

Ronald M. Colitti

Benita Colitti

Responses to Comment Letter H.6
Ronald and Benita Colitti
February 16, 2018

Response to Comment H.6-1:

Thank you for your comment and for your participation in this public process. The Commenter's general support for the Project will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The Commenter does not provide comments specifically concerning the adequacy of the Draft EIR and thus no further response is required.

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H.7

TRI POINTE™ GROUP

TriPointeGroup.com
p 949.438.1400
f 949.438.1401
19540 Jamboree Road, Suite 300
Irvine, CA 92612

February 28, 2018

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

RE: CENTENNIAL AT TEJON RANCH - SUPPORT

Dear Mr. Sacket:

As you know, working-class families in the County of Los Angeles are facing a housing crisis. We need housing, and we need price-attainable housing. I am writing to express my full support for the Centennial project because it will bring more housing for working class families.

Centennial is consistent with the Antelope Valley Area Plan (AVAP), offering a wide array of housing, business park/office space, retail, schools, parks, natural open space, cultural, and public uses.

Home building generates substantial economic activities. Activities include new income and jobs for residents as well as additional revenue for local governments. The National Association of Home Builders (NAHB) developed a model to estimate the economic benefits of new-home building. NAHB has estimated one year-impact on the building of 100 single-family homes include:

- $28.7 million in local income
- $3.6 million in taxes and other revenue for local governments
- 394 local jobs

H.7-1

Centennial will be bringing over 19,000 homes at buildout for California working-class families. On average, Centennial will bring over $30 million in annual surplus revenue for the County of Los Angeles and over 19,000 permanent local jobs.

We must alleviate our housing shortage throughout Los Angeles County. Centennial is a step in the right direction for the County to ease our housing crisis.

I ask that the Regional Planning Commission fully approve Centennial. It is the much-needed community for the working and middle-class families of Los Angeles County.

Sincerely,

Tom Mitchell
President & CEO, Tri Pointe Group

cc: Hon. Hilda Solis, Supervisor 1st District
Hon. Mark Ridley-Thomas, Supervisor 2nd District
Hon. Sheila Kuehl, Supervisor 3rd District
Hon. Janice Hahn, Supervisor 4th District
Hon. Kathryn Barger, Supervisor 5th District

Responses to Comment Letter H.7
Tri Pointe Group
February 28, 2018

Response to Comment H.7-1:

Thank you for your comment and for your participation in this public process. The Commenter's general support for the Project will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The Commenter does not provide comments specifically concerning the adequacy of the Draft EIR and thus no further response is required. The County did not independently review the accuracy of the Commenter's estimates of Project economic benefits.

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From: Wes and Rachel <rabbitcastle@earthlink.net>
Sent: Friday, March 2, 2018 5:45 PM
To: Jodie Sackett
Cc: psaatzer@msn.com; 'Donald Goeschl'; ashwynne@yahoo.com
Subject: Centennial Specific Plan Project

Although I want this project to succeed for the benefit of the dependent Tejon Ranch Conservancy, the following issues should be addressed:

- Lack of water
- Proximity to the San Andreas, the San Gabriel, and the Garlock Earthquake faults, site of the two largest earthquakes in Southern California history
- Destruction of wildlife habitat, including the wildlife corridor between the Sawmill Mountains and the Tehachapi Mountains
- Disturbance of hazardous waste from a nearby cement plant, which burned hazardous waste for decades
- Naturally occurring mercury, arsenic and selenium in the volcanic soil
- Increased incidence of so-called Valley Fever, from naturally occurring fungus in the Antelope Valley soil
- Increased dust levels in the eastern Antelope Valley
- Impact of rising fuel costs for commuters in the proposed development
- Impact of increasing fuel exhausts on the environment
- Impact of increased ground water pollution on the underlying aquifer
- Increased light pollution in the Antelope Valley
- Likelihood of future slant drilling into the underlying oil deposits

Frankly, I cannot imagine why anyone would seriously consider putting a city in a place where not one person has ever chosen to live. Nevertheless, I wish you and Tejon Ranch the best of luck.

H.8-1

Sincerely,

Wes Williamson
440 W. Hillsdale Street
Inglewood, Ca. 90302-1124
310 673 2648

Responses to Comment Letter H.8
Wes Williamson
March 2, 2018

Response to Comment H.8-1:

Thank you for your comment and for your participation in this public process. The Commenter's general opposition to the Project, as well as the Commenter's general concerns regarding urban sprawl, urban/wildland conflicts, habitat loss, and fire and seismic hazards, will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The Commenter does not provide comments specifically concerning the adequacy of the Draft EIR and thus no further response is required. However, please note that the Draft EIR addresses the issues listed by the Commenter in the following sections:

- The Project's potential impacts on water supplies are analyzed in Draft EIR Section 5.18, Water Resources;
- The Project's potential impacts related to earthquakes and seismicity are analyzed in Draft EIR Section 5.1, Geotechnical;
- The Project's potential impacts related to biological resources are analyzed in Draft EIR Section 5.7, Biological Resources;
- The Project's potential impacts related to hazardous waste, hazardous materials, soil quality and surface and ground water quality are analyzed in Draft EIR Sections 5.3, Hazards and Fire Safety, and 5.4, Water Quality;
- The Project's potential impacts related to Valley Fever, fugitive dust, and mobile emissions are analyzed in Draft EIR Sections 5.3, Hazards and Fire Safety, and 5.11, Air Quality;
- The Project's potential impacts related to light pollution are analyzed in Draft EIR Section 5.13, Visual Resources.

With regards to this comment's general concerns regarding rising fuel costs, such impacts are social in nature, not environmental, and thus are not required to be analyzed in the Draft EIR under CEQA. Finally, the Project does not propose future slant drilling on the Project site, although the Project's potential impacts on mineral resources are analyzed in Draft EIR Section 5.4, Land Resources.

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MAJESTIC REALTY CO.

R.E. License #00255328 (CA)

13191 Crossroads Parkway North • City of Industry, CA 91746-3497
Office (562) 692-9581 • FAX (562) 695-2329

March 6, 2018

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

RE: CENTENNIAL AT TEJON RANCH - SUPPORT

Dear Mr. Sackett:

Demonstrating the strength in this growing region, Majestic Realty just finished construction on a new 480,000 square foot industrial building at the Tejon Ranch Commerce Center. We believe so strongly in the future growth of this area that our company has developed this new facility on a speculative basis in partnership with Tejon Ranch. Since project completion, we have already seen strong tenant demand.

As this region continues to expand and grow well beyond the initial 4,000 jobs at the Commerce Center, those working-class families will need affordably priced homes. Centennial is designed to bring in first-time buyers, as well as families who are looking for a more inclusive community. It will offer small lot single-family detached residences, single-family and multi-family attached residences, including townhomes, condominiums, and apartments.

Centennial is the missing puzzle piece of Tejon Ranch, as well as a master-plan development that Los Angeles County so direly needs. When you have a community that allows you to work and live, it eliminates the biggest factors that LA County is facing: traffic, congestion and pollution.

Centennial would offer housing, schools, parks, commercial support and open space. It is designed to be a sustainable, self-contained community. Over 19,000 homes will be developed upon final build out. If we observe the median home price throughout Los Angeles County, Centennial becomes the County's attainable housing solution.

I ask that the Regional Planning Commission approve this project and allow for Centennial to begin its development.

H.9-1

Sincerely,

MAJESTIC REALTY CO.

Edward P. Roski, Jr.
President and Chairman of the Board

Brett Tremaine
Senior Vice President

cc: Hon. Hilda Solis, Supervisor 1st District
Hon. Mark Ridley-Thomas, Supervisor 2nd District
Hon. Sheila Kuehl, Supervisor 3rd District
Hon. Janice Hahn, Supervisor 4th District
Hon. Kathryn Barger, Supervisor 5th District

Responses to Comment Letter H.9
Majestic Realty Co.
March 6, 2018

Response to Comment H.9-1:

Thank you for your comment and for your participation in this public process. The Commenter's general support for the Project will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The Commenter does not provide comments specifically concerning the adequacy of the Draft EIR and thus no further response is required.

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From: Luapjerome Katie <luapjerome@gmail.com>
Sent: Monday, March 12, 2018 3:22 PM
To: Jodie Sackett
Subject: Centennial Project

The Tejon Company owners are not Developers. Take a look at The Outlets at Tejon? No trees, No walking paths,No picnic areas. No park setting? All that is there are commercial tilt ups and fast food? Embedded in a concrete jungle that is almost impossible to get out of. The Tejon Company should stick to growing Almonds!! That is even stupid? Almond crops take more water than any other crop? Please, please do not let these Armature wannabe Developers destroy the project. perhaps you could bring in someone like Steve Carruso of "The Legacy Group" who has designed beautiful shopping areas such as The Commons in Calabassas, Ca. To illustrate the Stupid, greedy mindset of the Tejon CEO. Please note that he wants to charge 30 grand a year per household to access the Tejon Ranch property? Please push for competent, thoughtful, proven consultants and FREE access to Tejon Ranch Wilderness areas. One other note. Tejon people are big on hunting and want to cater to rich, egomaniac hunters. How is this going to work with Families going for a nature hike? H.10-1

Thank you,

Paul Jerome

Responses to Comment Letter H.10
Paul Jerome
March 12, 2018

Response to Comment H.10-1:

Thank you for your comment and for your participation in this public process. The Commenter's general opposition to the Project will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The Commenter does not provide comments specifically concerning the adequacy of the Draft EIR and thus no further response is required.

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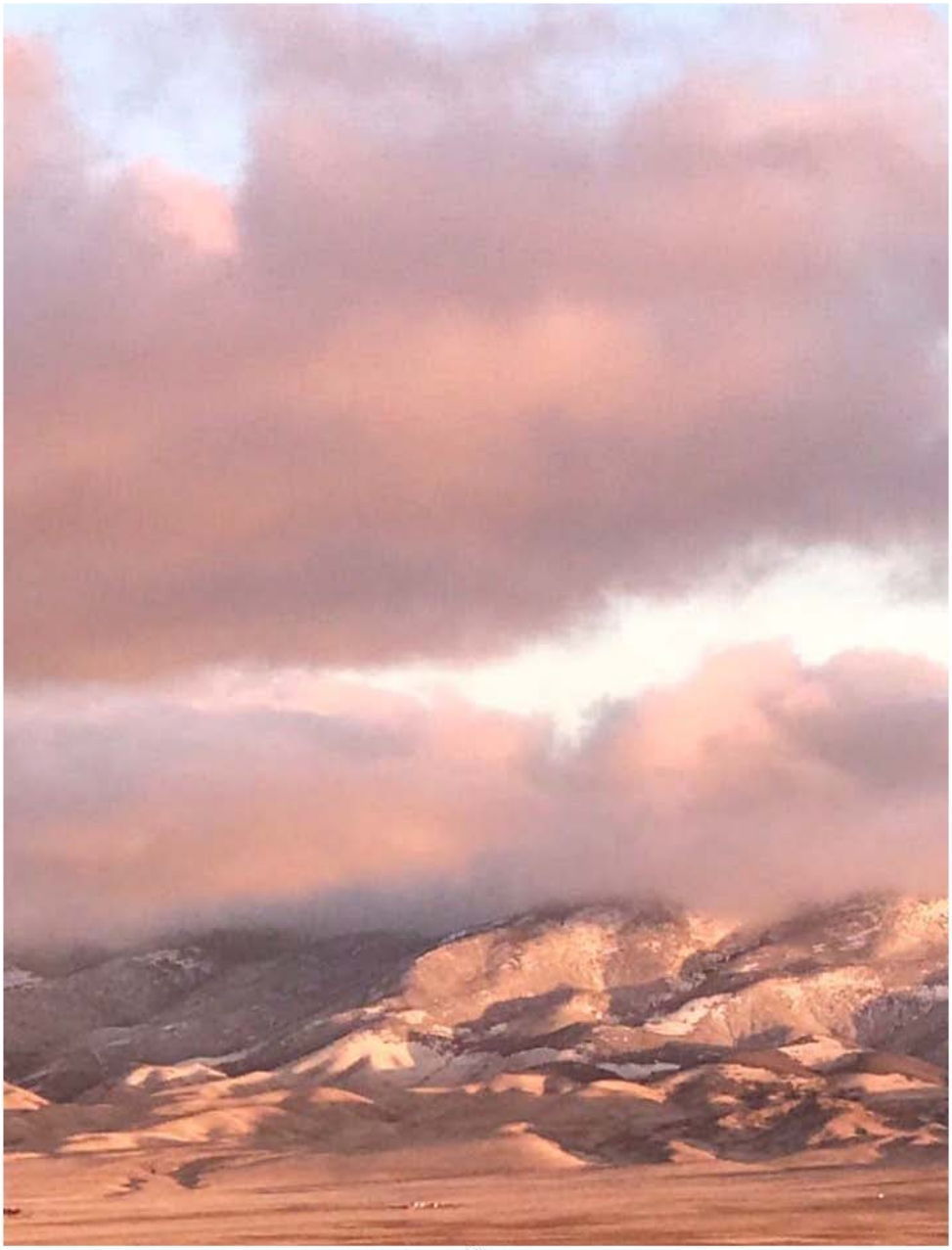
From: Jeff Zimmerman <epn409@gmail.com>
Sent: Saturday, March 17, 2018 10:14 AM
To: Jodie Sackett
Subject: Centennial Plan

Re:Centennial Plan,

There is not enough water resources in this valley to handle 60,000 additional people. West Valley County Water District for the existing town if Neenach is only allotted 40 acre feet from AVEK. How do you propose you are going to be allotted 30,000 acre feet of water per year? The grasslands are critical habitat for the entire ecosystem, concrete tilt up buildings and industry hurt the fragile ecosystem, it will bring traffic, pollution and destroy the view shed. Thank you, Jeff Zimmerman

H.11-1



Responses to Comment Letter H.11
Jeff Zimmerman
March 17, 2018

Response to Comment H.11-1:

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

The following information summarizes the analysis of regional water supplies and climate change impacts to water supplies in the Draft EIR. Long-term, cumulative regional water supplies are discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single-dry and multiple-dry years, and taking account of potential climate change impacts, prepared by the California Department of Water Resources in the State Water Project Delivery Capability Report.[3159] As discussed in Draft EIR Sections 5.18 and 7.0, the Antelope Valley Area Plan and General Plan environmental impact reports prepared by Los Angeles County concluded that current water supplies within the Antelope Valley would be sufficient to meet demand up to 2035 during average water years. The environmental impact reports further noted that available water plans and projections, including the 2013 Antelope Valley Integrated Regional Water Management Plan, indicated that current supplies would not sufficient to meet dry and multiple-dry year demand by 2035. The environmental impact reports found that while potential buildout of the Antelope Valley Area Plan and General Plan in the Antelope Valley region after 2035 could further increase regional water demand, there were no water supply projections extending after 2035. Consequently, the environmental impact reports found that cumulative impacts to regional water supplies would be significant and unavoidable because of the lack of projections for analyzing regional water supply sufficiency after 2035. The Draft EIR determined that the Project would help to reduce the water supply cumulative impact identified in the Antelope Valley Area Plan and General Plan environmental impact reports because it would achieve water use efficiencies above existing average rates in the region and would ensure that the Project-related increment of future regional growth considered in the Antelope Valley Area Plan and General Plan environmental impact reports would occur with a high level of water conservation, including state-of-the art household and irrigation installations and significantly enhanced recycled water use. Nevertheless, consistent with the Antelope Valley Area Plan and General Plan environmental impact reports, the Draft EIR determined that potential cumulative water supply impacts would be significant and unavoidable.

[3159] DRP 2017, Appendix 5.18-C

The draft 2017 State Water Project Delivery Capability Report (2017 DCR) was published by the California Department of Water Resources in December 2017. In contrast with the 2015 DCR[3160], the 2017 DCR provides a single analysis of State Water Project (SWP) delivery reliability during average, single-dry and multiple-dry years. The 2017 draft Technical Addendum to The State Water Project Delivery Capability Report also provides an analysis of SWP delivery reliability during average, single-dry and multiple-dry years for the Antelope Valley – East Kern Water Agency (AVEK). As discussed in Section 5.18 of the Draft EIR, the analysis of Project SWP supplies utilizes the same average, single-dry and multiple-dry year delivery reliability factors used by AVEK in the agency's most recent and current Urban Water Management Plan (UMWP).[3161] The UWMP and the Draft EIR utilize the Extended Long Term (ELT) SWP delivery reliability scenario for AVEK in the 2015 DCR, with the inclusion of a more conservative 5 percent delivery factor for a single-dry year. The SWP delivery scenario used in the Draft EIR includes lower average year (59 percent versus 61 percent), single-dry year (5 percent versus 8 percent) and multiple-dry year (average of 17 percent per year for 3 years versus 19 percent for 3 years) delivery rates than estimated for AVEK in the 2017 DCR. Consequently, the 2017 DCR estimates that more SWP water will be delivered to AVEK in average, single-dry and multiple-dry years than assumed in the Draft EIR and does not affect the Draft EIR analysis of Project water supplies.

The Project's water supplies are discussed in Section 5.18, Water Resources, of the Draft EIR and are separate from, and will not affect, the Frazier Park and Gorman area water supplies referenced in this comment. Climate change is discussed in Draft EIR Section 5.21, Climate Change; Section 1.6.21, Climate Change; Section 7.3.21, Climate Change; and in other topical sections of the Draft EIR, including Section 5.18, Water Resources. The analysis of Project water supplies utilizes the Early Long Term delivery reliability scenario published by the California Department of Water Resources in the 2015 State Water Project Delivery Capability Report. The Early Long Term delivery reliability scenario is utilized in the 2015 UWMP adopted by AVEK, the SWP contractor for Antelope Valley and for the Project. As discussed in Draft EIR Section 5.18, in contrast with the base scenario in the Delivery Capability Report, the Early Long Term scenario incorporates significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. As a result, the average year SWP delivery rate in the Early Long Term scenario is more conservative and lower than the Delivery Capability Report base scenario rate. Consistent with AVEK methodology used in the Agency's 2015 UWMP, the Early Long Term scenario is further modified to incorporate a single-dry year delivery rate of 5 percent, lower than used in the Delivery Capability Report, to reflect delivery levels during the recent California drought. The UWMP was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. Consequently, the Draft EIR includes a discussion of climate change effects on water supplies that is consistent with the conservative Early Long Term scenario developed in the Delivery Capability Report and the same scenario, with a reduced single-dry year reliability level, used in AVEK's 2015 UWMP.

3160 *Ibid.*
3161 *Id.,* Appendix 5.18-F

The Commenter is directed to Draft EIR Section 5.7 for analysis of the Project's potential impacts on biological resources, Section 5.10 for analysis of the Project's potential impacts related to traffic, Section 5.11 for analysis of the Project's potential impacts on air quality, and Section 5.13 for analysis of the Project's potential impacts on visual resources.

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From: Corina Roberts <redbirds_vision@hotmail.com>
Sent: Sunday, March 18, 2018 1:59 AM
To: Jodie Sackett
Subject: Centennial project

I recently became aware of the Centennial Development and the tour of the proposed development site. I am relatively familiar with this area.

A 19,000 plus home development is not sustainable with the primary and obvious reason being the water resource.

While California has always known periods of drought, those periods are becoming more frequent and more intense, with mandatory water rationing giving rise to the de-greening of whole regions and the death of urban and suburban trees; something which may seem insignificant until one takes into account the cooling effect of trees and grass and the quantitive feedback loop of their loss...more heat, and more loss...so although one might think the Centennial Project is sufficiently in the middle of nowhere to not have a real impact on anyone, that is not true. Any development of this magnitude impacts all of the Californians who will have to share resources with it.

The Gorman area is valuable precisely because it is open and primarily undeveloped. The value of open space is often overlooked in the desire to create more housing and with the financial gain potential for the developers. Open space has value for wildlife, human recreation, aquifer recharge, migratory birds and other species, and air quality. While trees are well known for their oxygen producing qualities, chaparral environs not only produce oxygen but have carbon sequestering benefits as well. H.12-1

The impact on the existing communities and the infrastructure must also be taken into consideration. The additional traffic impact on the single major ingress and egress road, Interstate 5, will be substantial. And as we have seen repeatedly in other parts of the state, in an emergency situation, a single major ingress and egress corridor can be a recipe for even more disaster.

Nineteen thousand homes is not just a sprawling neighborhood. It's a city. Everything will have to come with this housing development. All forms of service including fire and police. Stores. Recreation facilities. Because the people who move here will not be like the residents who are already there. They will be urban-oriented; they will be moving to the area because it has been transformed from a rural paradise into a housing complex. They will not bring with them an inherent understanding of living in harmony with a natural environment, nor will they need to; that environment will be forever destroyed by the presence of this development.

I oppose the Centennial Development and would appreciate it if my concerns and comments could be shared as a part of the public record. Thank you for your time and consideration.

Sincerely,

Corina Roberts

Corina Roberts, Founder
Redbird
http://secure-web.cisco.com/1UTiA6KC185eU4p-T55zJFO76iFsvBs_PFb6LTaR3iqx-dnxUysvB75KZR6vlKl7kzyRd5TeFtLt6ltcP9LJuJymPDYIcy-e6M3GGvx35QwSqHv57UidOq6eqCDKXScAdaBB42B_-lUSJbS9_G12_sf_B9C4JyS0EQTQZsqpFCBOwKm8d1oVh15VAC9YhqOwQ0sICC-elwk8awReSGumJvIGXjTJQ6ktW2a5HfddHrXa6ZDPQjMaP68p0DIeSHiA1FKSYJCR8OqMOBQMf9uQBcf3GtJ2m5Ju6e4p8xCBPdqJ1Y4pEI6mkpESKjm6M1QHx_v0hdP7UVjskS3UF2v7kcJmL9UbOJ4OHItk1q26NwF_xLI6_zfw3ZJACZhqPJwN6oT3zvRM33asyquLsi2XcmQ/http%3A%2F%2Fwww.RedbirdsVision.org
Forest Recovery Project Photographer
http://secure-web.cisco.com/1HjAA5ybzIKX2uYHm5MOgekhAT9083a-bvInIHHwRNfJ65x26AXeDxv66qWWpSkqrhUHfvl7oMdc6dSV3YsYA51fn-o4j0V9J3iTaN1ILGs0RZQGblsi5EEj_uuiVWBCnt9sMR5n3i7ler1_eJAFcwE8qcxObCZp81CoqAB5VVjT5jc0zjuj_34cFntDloOjfW6AtVBpMBwtmJ-UBFfzJji1V8z1TfMO7H5ScnyMpHq250Z7npSclL-Csn_wrbw_kfKjzGMowVNn55YapDnKa2rK-QX0KwFHWM4E_XCY1yAUOj8XGmsPahqxtwRzS6eQRBDzRFI_RVou-h8FVtU-_8LwU_KTvJelZ5VGoi3t0GNWwo83ci28Hbdi4S-0SaZJaYLhoj6CjiOVOBns4qw3MfA/http%3A%2F%2Fforest-recovery-project.smuqmuq.com%2FFireEcology%2FFeature-Gallery-the-best-of-th%2FForest-Recovery-Project

With gratitude to the sponsors who make our work possible - The Jiji Foundation(Forest Recovery Project), SCE International (Chilao School, Forest Recovery Project), The Barbara Barnard Smith Fund for World Musics/Ventura County Community Foundation (Children of Many Colors Powwow), the California Arts Council (Children of Many Colors Powwow), Moorpark College (Children of Many Colors Powwow), the Moon Family Trust (Chilao School, Forest Recovery Project, Children of Many Colors Powwow)

Responses to Comment Letter H.12
Corina Roberts
March 18, 2018

Response to Comment H.12-1:

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

The following information summarizes the analysis of regional water supplies and climate change impacts to water supplies in the Draft EIR. Long-term, cumulative regional water supplies are discussed in Draft EIR Section 7.0, Cumulative Impacts, pages 7-26 to 7-28 and in Section 5.18, Water Resources. The Draft EIR found that the Project's water supplies will sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved. This surplus would persist over time based on an 82-year hydrologic period of record, including single-dry and multiple-dry years, and taking account of potential climate change impacts, prepared by the California Department of Water Resources in the State Water Project Delivery Capability Report.[3162] As discussed in Draft EIR Sections 5.18 and 7.0, the Antelope Valley Area Plan and General Plan environmental impact reports prepared by Los Angeles County concluded that current water supplies within the Antelope Valley would be sufficient to meet demand up to 2035 during average water years. The environmental impact reports further noted that available water plans and projections, including the 2013 Antelope Valley Integrated Regional Water Management Plan, indicated that current supplies would not sufficient to meet dry and multiple-dry year demand by 2035. The environmental impact reports found that while potential buildout of the Antelope Valley Area Plan and General Plan in the Antelope Valley region after 2035 could further increase regional water demand, there were no water supply projections extending after 2035. Consequently, the environmental impact reports found that cumulative impacts to regional water supplies would be significant and unavoidable because of the lack of projections for analyzing regional water supply sufficiency after 2035. The Draft EIR determined that the Project would help to reduce the water supply cumulative impact identified in the Antelope Valley Area Plan and General Plan environmental impact reports because it would achieve water use efficiencies above existing average rates in the region and would ensure that the Project-related increment of future regional growth considered in the Antelope Valley Area Plan and General Plan environmental impact reports would occur with a high level of water conservation, including state-of-the art household and irrigation installations and significantly enhanced recycled water use. Nevertheless, consistent with the Antelope Valley Area Plan and General Plan environmental impact reports, the Draft EIR determined that potential cumulative water supply impacts would be significant and unavoidable.

[3162] DRP 2017, Appendix 5.18-C

The draft 2017 State Water Project Delivery Capability Report (2017 DCR) was published by the California Department of Water Resources in December 2017. In contrast with the 2015 DCR[3163], the 2017 DCR provides a single analysis of State Water Project (SWP) delivery reliability during average, single-dry and multiple-dry years. The 2017 draft Technical Addendum to The State Water Project Delivery Capability Report also provides an analysis of SWP delivery reliability during average, single dry and multiple dry years for the Antelope Valley – East Kern Water Agency (AVEK). As discussed in Section 5.18 of the Draft EIR, the analysis of Project SWP supplies utilizes the same average, single-dry and multiple-dry year delivery reliability factors used by AVEK in the agency's most recent and current Urban Water Management Plan (UMWP).[3164] The UWMP and the Draft EIR utilize the Extended Long Term (ELT) SWP delivery reliability scenario for AVEK in the 2015 DCR, with the inclusion of a more conservative 5 percent delivery factor for a single dry year. The SWP delivery scenario used in the Draft EIR includes lower average year (59 percent versus 61 percent), single-dry year (5 percent versus 8 percent) and multiple-dry year (average of 17 percent per year for 3 years versus 19 percent for 3 years) delivery rates than estimated for AVEK in the 2017 DCR. Consequently, the 2017 DCR estimates that more SWP water will be delivered to AVEK in average, single-dry and multiple-dry years than assumed in the Draft EIR and does not affect the Draft EIR analysis of Project water supplies.

The Project's water supplies are discussed in Section 5.18, Water Resources, of the Draft EIR and are separate from, and will not affect, the Frazier Park and Gorman area water supplies referenced in this comment. Climate change is discussed in Draft EIR Section 5.21, Climate Change; Section 1.6.21, Climate Change; Section 7.3.21, Climate Change; and in other topical sections of the Draft EIR, including Section 5.18, Water Resources. The analysis of Project water supplies utilizes the Early Long Term delivery reliability scenario published by the California Department of Water Resources in the 2015 State Water Project Delivery Capability Report. The Early Long Term delivery reliability scenario is utilized in the 2015 UWMP adopted by the AVEK, the SWP contractor for Antelope Valley and for the Project. As discussed in Draft EIR Section 5.18, in contrast with the base scenario in the Delivery Capability Report, the Early Long Term scenario incorporates significant assumptions regarding potential climate change impacts, including 2025 greenhouse gas emission levels and a 15-centimeter sea level rise. As a result, the average year SWP delivery rate in the Early Long Term scenario is more conservative and lower than the Delivery Capability Report base scenario rate. Consistent with the AVEK methodology used in the Agency's 2015 UWMP, the Early Long Term scenario is further modified to incorporate a single-dry year delivery rate of 5 percent, lower than used in the Delivery Capability Report, to reflect delivery levels during the recent California drought. The UWMP was reviewed and determined to meet all California Water Code requirements by the California Department of Water Resources in March 2017. Consequently, the Draft EIR includes a discussion of climate change effects on water supplies that is consistent with the conservative Early Long Term scenario developed in the Delivery Capability Report and the same scenario, with a reduced single-dry year reliability level, used in the AVEK's 2015 UWMP.

3163 *Ibid.*
3164 *Id.,* Appendix 5.18-F

The Commenter is directed to Draft EIR Section 5.7 for analysis of the Project's potential impacts on biological resources, Section 5.10 for analysis of the Project's potential impacts related to traffic, Section 5.14 for an analysis of the Project's potential impacts related to parks and recreation, and Sections 5-16 and 5.17 for an analysis of the Project's potential impacts related to public services and police and fire services.

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CALIFORNIA WILDLIFE FOUNDATION
428 13th Street, Suite 10A
Oakland, CA 94612

WWW.CALIFORNIAWILDLIFEFOUNDATION.ORG
tel 510.208.4436
fax 510.268.9948

March 20, 2018

David W. Louie, Chair, Planning Commission
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

(Via email: c/o Jodie Sackett, jsackett@planning.lacounty.gov)

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

Dear Commissioner Louie:

The California Oaks program of California Wildlife Foundation works to conserve oak ecosystems because of their critical role in sequestering carbon, maintaining healthy watersheds, and providing sustainable wildlife habitat. We understand that the Centennial development is moving forward in the context of the land conserved by Tejon Ranch. However, we are writing out of consideration for the future residents of the development and because of the growing threats to climatic stability from conversion of oak woodlands.

As construed, the project removes vital habitat in a sensitive landscape and the project fails to comprehensively analyze or feasibly and proportionally mitigate terrestrial conversion vegetation and soil organic carbon direct/indirect greenhouse gas emissions pursuant to California Environmental Quality Act requirements. Specifically, the failure to fully account for the foreseeable carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), black carbon and hydrofluorocarbon emission effects due to biomass disposal decomposition, combustion, and transportation, and the soil CO_2 emissions associated with ground disturbing activities. These omissions represent a failure to proceed in the manner prescribed by CEQA.

H.13-1

Looking at Table 5.21-4, which supposedly reports on Vegetation Change and Greenhouse Gas Emissions in the chapter on that addresses Climate Change impacts, one would not know that this is the same project that will negatively impact the Biological Resources, including oak resources, as described in 5.7.

We welcome you to contact us if we can be of assistance.

Sincerely,

Janet Cobb

Janet Cobb
Executive Officer, California Wildlife Foundation/California Oaks

cc: The Honorable Governor Brown

Responses to Comment Letter H.13
California Wildlife Foundation/California Oaks
March 20, 2018

Response to Comment H.13-1:

Thank you for your comment and for your participation in this public process. The County disagrees with the Commenter's opinion that the Draft EIR failed to adequately disclose and analyze the Project's potential greenhouse gas (GHG) impacts related to vegetation conversion. As explained in Section 5.21, Climate Change, total Project GHG emissions were calculated using the California Emissions Estimator Model (CalEEMod), inclusive of CO2 CH4, N2O, particular matter (which includes black carbon), and hydrofluorocarbon emissions, for all Project activities.[3165] In addition to the construction and operation emission inputs described in Section 5.11, Air Resources, the GHG emissions analysis input data included carbon sequestration loss from vegetation removal associated with ground disturbing activities, as well as carbon sequestration gain from tree planting.[3166]

As disclosed on Draft EIR page 5.21-54, permanent vegetation changes that would occur as a result of Project development constitute a change in the carbon sequestration capacity of the Project site. The loss of vegetation would occur concurrently with Project construction. Accordingly, the increase in GHG emissions attributable to the loss of carbon sequestration was amortized over 30 years. However, the reduction in GHG emissions resulting from the planning of new trees would occur more slowly and, therefore, the Draft EIR conservatively amortized such reduction over 100 years in accordance with the recommendations of the International Panel on Climate Change (IPCC).

As shown in Draft EIR Table 5.21-4, the Project's removal of an estimated 6,416 acres of grassland and other vegetation covers on the Project site during construction would result in an estimated reduction in current levels of sequestration of 27,653 $MTCO_2$.[3167] As also shown in Table 5.21-4, the planting of an estimated 35,123 new trees, as required by the adopted County Tree Planting Ordinance, would result in an estimated long-term sequestration of 24,867 $MTCO_2e$. Therefore, in total, the Project would result in an overall reduction in the amount of carbon sequestration on the Project site, resulting in an overall increase in GHG emissions of 2,786 $MTCO_2$ (27,653–24,867 $MTCO_2$).

To mitigate Project GHG impacts, including emissions related to vegetation conversion, the Draft EIR sets forth 46 mitigation measures to reduce GHG emissions from Project operations/construction activities and the Specific Plan includes additional commitments to sustainable design and operational practices which minimize GHG emissions. In addition, the mitigation measures have been revised and added in response to comments on the Draft EIR to further reduce the Project's GHG emissions. See revised and added mitigation measures set forth in responses to Comments F.8-95, F.8-204, F.2-2, F.2-5, F.3-29, F.3-34, and F.8-189.

[3165] DRP 2017, pp. 5.21-5, 5.21-50; DRP 2017, Appendix 5.11-A.
[3166] *Ibid.*
[3167] *Id.,* p. 5.21-54

With respect to the Commenter's general statement regarding the Project's purported "negative" impact on oak trees, Section 5.7 of the Draft EIR explains that the Project would not impact any oak trees located off-site.[3168] Of the approximately 33,861 oak trees that are present on the Project site and which are under the jurisdiction of the County's Oak Tree Ordinance, an estimated 91 regulated oaks would be impacted by the Project (only 7 of which qualify as "heritage" trees). These impacts would, however, be reduced to a less than significant level with implementation of PDFs 7-4 and 7-5, and MMs 7-11, 7-20, and 7-21.[3169]

[3168] *Id.,* p. 5.7-172
[3169] *Ibid.*

U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052

FEMA

March 27, 2018

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

Dear Ms. Sackett:

This is in response to your request for comments regarding Revised Notice of Public Hearing for project known as Centennial Specific Plan Project No. 02-232-(5).

Please review the current effective Flood Insurance Rate Maps (FIRMs) for the County of Los Angeles (Community Number 065043), Maps revised April 4, 2018. Please note that the County of Los Angeles, California is participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.

- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any ***development*** must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

H.14-1

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtm.

H.14-1 cont.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Los Angeles County floodplain manager can be reached by calling Pat Wood, Senior Civil Engineer, at (626) 458-6131.

If you have any questions or concerns, please do not hesitate to call Brian Trushinski of the Mitigation staff at (510) 627-7183.

Sincerely,

Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:
Pat Wood, Senior Civil Engineer, County of Los Angeles
Garret Tam Sing/Salomon Miranda, State of California, Department of Water Resources, Southern Region Office
Brian Trushinski, NFIP Planner, DHS/FEMA Region IX
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

RECEIVED
APR 03 2018
BY:

Responses to Comment Letter H.14
FEMA Region IX
March 27, 2018

Response to Comment H.14-1:

Thank you for your comments and for your participation in this public process. This comment summarizes certain floodplain management building requirements set forth in the Federal Code of Regulations, Volume 44, Sections 59 through 65. As discussed in Section 5.2, Hydrology and Flood, the Project requires that a Floodplain Safety Overlay be implemented for the mapped floodplain portions of the Project site that precludes placement of housing within a 100-year floodplain, which requirement has been incorporated into MM 2-3. No Project housing will be placed in a 100-year floodplain, or other floodway or floodplain identified on other hazard delineation maps and no off-site housing will be constructed as part of the Project.[3170] Moreover, MM 2-3 requires that, prior to the recordation of any tract map that would locate any structure within a mapped 100-year floodplain, the floodplain boundaries must be more precisely determined and an engineering study must be conducted to identify applicable flood-control and floodplain development protection measures. Per MM 2-3 the study must demonstrate that all applicable FEMA and County of Los Angeles floodplain flood flow and development standards will be met after the proposed construction has been completed (including all applicable FEMA standards and requirements cited by the Commenter). Also, MM 2-3 requires that a conditional letter of map revision be obtained from FEMA indicating that any proposed facility that would modify a mapped floodplain would be recognized by FEMA if built as proposed. The floodplain map would subsequently be revised based on as-built conditions in accordance with FEMA and County floodplain map revision requirements. The Commenter's offer of assistance is noted with appreciation, as is the Commenter's provision of its relevant contact information.

[3170] DRP 2017, p. 5.2-45

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SOUTHERN CALIFORNIA EDISON
An EDISON INTERNATIONAL Company

RECEIVED
MAR 27 2018

H.15

County of Los Angeles
320 W. Temple Street
Los Angeles, CA 90012

March 7, 2017

Attention: Jodie Sackett- Department of Regional Planning

Subject: Centennial Specific Plan Project
State Clearinghouse No. 2004031072 project No. 02-232-(5)
Specific Plan No. 02-232, General Plan Amendment No. 02-232
Zone Change No. 02-232,
Vesting Tentative Parcel Map No. 060022, CUP No. 02-232
Development Agreement No. RPPL2016003940

Our review of the subject subdivision map reveals that the proposed development may interfere with easement rights, and/or facilities held by Southern California Edison within the subdivision boundaries. Until such time as arrangements have been made with the developer to eliminate this interference, the development of the subdivision may unreasonably interfere with the complete and free exercise of Edison's rights.

Two copies of the following maps in hardcopy with scaled plans (1"=50' maximum), including all maps submitted on a disc in .pdf format: including grading, drainage, landscape and street improvement plans are required to be submitted by the developer to determine the extent of the interference. The Edison facilities and the easements should be plotted on the above reference maps. Included with the above referenced plans, the developer must state the proposed method to eliminate any interference. Plans should be forwarded to my attention at the following address:

H.15-1

Southern California Edison Company
Real Properties, PIV2
2 Innovation Way
Pomona, CA 91768
Attention: Jeremy Beard

If you have any questions, or need additional information in connection with the subject subdivision, please contact me at (909) 274-1072.

Jeremy Beard
Title and Real Estate Services
Real Properties

Responses to Comment Letter H.15
Southern California Edison
March 27, 2018

Response to Comment H.15-1:

Thank you for your comment and for your participation in this public process. As disclosed on page 5.20-10 of the Draft EIR, and consistent with this comment, Southern California Edison (SCE) has an existing right-of-way easement for its facilities within and surround the Project boundaries. As shown on Draft EIR Exhibit 5.20-1, the vast majority of this right-of-way easement affect portions of the Project site that will be designated for open space uses and, therefore, are not expected to be affected by development of the Project. Moreover, consistent with this comment, MM 20.2-1 obligates the Project Applicant/Developer to coordinate with SCE as part of the subdivision map application process to ensure that there are no prolonged disruptions to the existing transmission lines that extend through the Project study area and to coordinate the design and implementation of future electrical service and facilities (e.g., transmission lines, access road) in the Project study area. This will ensure that (1) no prolonged service disruptions during the extension and upgrading of these services would arise, (2) the nature, design, and timing of electrical system improvements are in accordance with all SCE requirements (including those described in this comment); and (3) the improvements are adequate to serve the proposed land uses and are available to the first occupied land uses.

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Association of Rural Town Councils
Susan Zahnter, Director
Jeffrey Hillinger, Assistant Director
Merrylou Nelson, Secretary
C/O Three Points/Liebre Mountain Town Council
P.O. Box 76
Lake Hughes, CA 93532
ourartc@gmail.com
661.724.2043

25 March 2018

SENT VIA EMAIL

Mr. Jodie Sackett, Senior Planner
County of Los Angeles
Department of Regional Planning
Hall of Records, Thirteenth Floor
320 West Temple Street
Los Angeles, CA 90012
jsackett@planning.lacounty.gov

Dear Mr. Sackett,

Subject: Centennial Project SP 02-0232 April 25th Regional Planning Commission Hearing

The Association of Rural Town Councils duly requests Regional Planning reschedule the April 25th revised hearing date for the Centennial Project, and that the hearing be held in the Antelope Valley, on a date and time that will not incur hardship for many working residents. Since a majority of project impacts will occur in the North County, it seems fair to request such a change. We also request a minimum 60 day review period, due to the large volume of documents associated with this project. Ten days allowed by law, indicated in the Revised Hearing Notice, dated March 8, 2018, is far from adequate time, especially considering project proponents and planners have worked nearly *twenty years* on this massive specific plan. We look forward to your response. H.16-1

Sincerely,

Susan Zahnter

Susan Zahnter, Director

Copy to: Fifth District Supervisor Kathryn Barger, Fifth District Planning Deputy Chris Perry, Fifth District Senior Field Deputy Donna Termeer, Regional Planning Commission via Ms. Rosie Ruiz, Community Studies North Section Supervising Regional Planner Susan Tae

Responses to Comment Letter H.16
Association of Rural Town Councils
March 28, 2018

Response to Comment H.16-1:

Thank you for your comment and for your participation in this public process. The Commenter does not provide comments specifically concerning the adequacy of the Draft EIR and thus no further response is required. The Commenter's request that the Regional Planning Commission hearing to consider the Centennial Project be rescheduled and relocated is noted and will be provided to the Regional Planning Commission and Board of Supervisors for their consideration, as will the Commenter's request regarding the 10-day notice period for such hearing. It should be noted that the April 25, 2018 hearing date described in the Commenter's letter has been rescheduled to occur on June 6, 2018.

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From: Jack T. <jacktca@gmail.com>
Sent: Tuesday, April 3, 2018 11:50 AM
To: Jodie Sackett
Subject: Centennial EIR

The EIR is incomplete. It does not specify the damage done to the neighboring communities as Tejon excersizes its right to build based on market forces. I am middle class and I pay property tax. I cannot decide whether or not to pay property tax based on how the market is doing or not. Tejon avoids paying property tax on 20,000 house lots. As a result of their great giant tax break Tejon can wait for the market to be just right before taking the final step to turn the tentative tracts into actual building lots. I have to pay LA county for a house lot and building lot no matter what.

Tejon (TRC) is a way for the super rich to be able to move their earnings in the stock market into real estate without cashing out and actually buying real estate. What if the 1% club decides that there is more money to be made by not building just yet? That option is not in the EIR. The entire plan is based the assumption that Centennial will be built. All the while there is no penalty or pressure on TRC to build.

There are no stores out there. There are no gas stations. No jobs. No nothing. The last time Los Angeles County paved a street in the local area was NEVER! In many ways Neenach resembles a third world country.

If Tejon decides not to build this community there will continue to be nothing out there. But the plans say there's a library, huge shopping center, park, etc. etc.

If TRC (Tejon) does what is good for their investors they might just hold off on their plans to build. Logic 101 business 101 but not in your EIR plan.

There needs to be a use-it-or-lose-it clause in this deal with Tejon ranch.

H.17-1

Responses to Comment Letter H.17
Jack T.
April 3, 2018

Response to Comment H.17-1:

Thank you for your comment and for your participation in this public process. With respect to this comments assertion that the EIR should have evaluated the Project's potential economic effects on neighboring communities, it is noted that Public Resources Code § 21100 requires that the EIR evaluate the environmental impacts of project. However, CEQA Guidelines § 15131(a) expressly provides that "[e]conomic or social effects of a project shall not be treated as significant effects on the environment." Accordingly, the EIR is not permitted to consider purported adverse economic effects of the Project "based on market forces" unless such economic effects are found to cause a significant environmental effect.[3171] This comment provides no substantial evidence, however, that the Project would cause an adverse economic effect on neighboring communities, or evidence that any such economic effect would cause a significant environmental effect that was not adequately analyzed in the Draft EIR. Nevertheless, this comment will be provided to the Regional Planning Commission and Board of Supervisors for their consideration.

[3171] 14CCR § 15131(a)

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From: Test User <user@test.zzz>
Sent: Friday, April 6, 2018 10:41 AM
To: Jodie Sackett; cperry@bos.lacounty.gov; Kathryn@bos.lacounty.gov
Subject: Centennial Letter

Name : Test User
Email : user@test.zzz
Address : 13 Main
City : California
Zip:90010

Dear Mr. Sacket:

I'm writing in support of Centennial at Tejon Ranch. The County of Los Angeles is facing a housing crisis and we need a variety of housing types in various locations throughout Los Angeles County. Centennial's master-plan will do just that; create more price-attainable housing and it will help accommodate the planned regional population and economic growth in our county.

As you know, Centennial is consistent with the Antelope Valley Area Plan (AVAP), offering a wide array of housing, business park/office space, commercial, schools, parks, natural open space, cultural, and public uses.

The community masterplan is simply the implementation of the AVAP, a balanced plan of economic opportunity and conservation. Centennial has also been at the table with the Golden State Gateway Coalition in regards to fast tracking the I-5 improvements before this new community has been set.

It is important to define the project location in terms of synergy with the growing populations near the Centennial project. There is great synergy between other Tejon Ranch projects in Kern County, including Grapevine and Tejon Mountain Village, as well as the Antelope Valley and Santa Clarita.

Centennial is LA County's opportunity to take advantage of growth at Tejon Ranch in Kern County by increasing tax revenue for the general fund and providing increased public services to North LA County, but also providing diverse working-class and middle-income families an opportunity for homeownership.

In addition, Centennial includes plans to focus on water conservation through the use of recycled water and several other sustainable sources. The project's Green Development program requires reduced potable water consumption through the use of drought-tolerant plants, low-flow showerheads, faucets, and toilets. The Centennial master plan will also use recycled water for landscape irrigation in residential common areas.

I urge the Regional Planning Commission to approve and allow Centennial to move forward. We need to finally begin development on this much-needed community.

H.18-1

Responses to Comment Letter H.18
Test User
April 6, 2018

Response to Comment H.18-1:

Thank you for your comment and for your participation in this public process. The Commenter's general support for the Project will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The Commenter does not provide comments specifically concerning the adequacy of the Draft EIR and thus no further response is required.

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From: asenseman@everyactioncustom.com on behalf of Ariel Senseman <asenseman@everyactioncustom.com>
Sent: Monday, April 16, 2018 2:39 PM
To: Jodie Sackett
Subject: Please Vote No on the Centennial Development

Dear Jodie Sackett,

I write to ask you to deny the development because of the additional cars it will undoubtedly add to our already crowded roads, adding to some of the longest commute times in the US. Furthermore, the added emissions these commuters will add to our air will cement Los Angeles' place atop the list of US cities with the worst air quality.

We need sustainable development in Los Angeles county. Please say no to Centennial.

We are losing our native plants and animals. Our wilderness areas are rapidly diminishing. In addition, building in this very high fire severity zone area creates the real possibility for even more massive fires, further draining firefighting resources already stretched thin in this state.

Please protect our natural resources, and the health of our citizens. Do not allow the Centennial development to destroy both in a misguided effort to create jobs and housing. Instread, find a better way to create both, while furthering the sustainable development we need in our county.

H.19-1

Sincerely,
Ariel Senseman
Pasadena, CA 91106
asenseman@gmail.com

Responses to Comment Letter H.19
Ariel Senseman
April 16, 2018

Response to Comment H.19-1:

Thank you for your comment and for your participation in this public process. The Commenter's general opposition to the Project will be provided to the Regional Planning Commission and Board of Supervisors for their consideration. The Commenter does not provide comments specifically concerning the adequacy of the Draft EIR and thus no further response is required.

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RECEIVED
APR 30 2018
BY:

U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052

FEMA

April 20, 2018

Jodie Sackett
Department of Regional Planning
County of Los Angeles
Hall of Records, 13th Floor, Room 1340
320 West Temple Street
Los Angeles. California 90012

Dear Ms. Sackett:

This is in response to your request for comments regarding Los Angeles County Revised Notice of Public Hearing Centennial Specific Plan Project SCH2004031072.

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the Counties of Los Angeles (Community Number 065043), Maps revised April 4, 2018 and Kern (Community Number 060075), Maps revised September 26, 2008. Please note that the Counties of Los Angeles and Kern, California are participants in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.

- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any ***development*** must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

H.20-1

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtm.

H.20-1 cont.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Los Angeles County floodplain manager can be reached by calling Pat Wood. Senior Civil Engineer, at (626) 458-6131. The Kern County floodplain manager can be reached by calling Aaron Leicht, Engineer III, at (661) 862-5093.

If you have any questions or concerns, please do not hesitate to call me at (510) 627-7186.

Sincerely,

Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:
Pat Wood, Senior Civil Engineer, Los Angeles County
Aaron Leicht, Engineer III, Kern County
Garret Tam Sing/Salomon Miranda, State of California, Department of Water Resources, Southern Region Office
Brian Trushinski, NFIP Planner, DHS/FEMA Region IX
Eugene Greenberg, NFIP Planner, DHS/FEMA Region IX
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

Responses to Comment Letter H.20
FEMA Region IX
April 30, 2018

Response to Comment H.20-1:

Thank you for your comments and for your participation in this public process. This comment summarizes certain floodplain management building requirements set forth in the Federal Code of Regulations, Volume 44, Sections 59 through 65. As discussed in Section 5.2, Hydrology and Flood, the Project requires that a Floodplain Safety Overlay be implemented for the mapped floodplain portions of the Project site that precludes placement of housing within a 100-year floodplain, which requirement has been incorporated into MM 2-3. No Project housing will be placed in a 100-year floodplain, or other floodway or floodplain identified on other hazard delineation maps and no off-site housing will be constructed as part of the Project.[3172] Moreover, MM 2-3 requires that, prior to the recordation of any tract map that would locate any structure within a mapped 100-year floodplain, the floodplain boundaries must be more precisely determined and an engineering study must be conducted to identify applicable flood-control and floodplain development protection measures. Per MM 2-3 the study must demonstrate that all applicable FEMA and County of Los Angeles floodplain flood flow and development standards will be met after the proposed construction has been completed (including all applicable FEMA standards and requirements cited by the Commenter). Also, MM 2-3 requires that a conditional letter of map revision be obtained from FEMA indicating that any proposed facility that would modify a mapped floodplain would be recognized by FEMA if built as proposed. The floodplain map would subsequently be revised based on as-built conditions in accordance with FEMA and County floodplain map revision requirements. The Commenter's offer of assistance is noted with appreciation, as is the Commenter's provision of its relevant contact information.

[3172] DRP 2017, p. 5.2-45

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Dear Jodie Sackett,

Scientists warn that we're in the middle of a climate crisis. Because transportation is the single largest driver of carbon pollution in California, new development located far from existing cities has disproportionately large climate impacts. Centennial exemplifies poor, outdated land-use planning on an unprecedented scale. This isolated new city would lock in at least 75,000 new vehicle trips per day with an average trip length of over 45 miles.

If you're committed to a sustainable future for L.A., then you need to say no to Centennial.

L.A.'s wildlands are rapidly diminishing. Ninety-nine percent of California's native grasslands are already gone forever, paved over by similar sprawl development. The Centennial project site contains the last, largest and best native grassland and wildflower fields left in California. Rare wildlife such as California condors, bald eagles, kit foxes and pronghorn also will be harmed if Centennial is built.

It's your job to protect our communities and natural resources, not sell them out to developers.

L.A. County should be setting the standard for 21st-century planning by supporting transit-friendly, urban, affordable housing. Centennial is a poster child of 20th-century sprawl development that exacerbates threats to our population through increasing greenhouse gas production and climate change, air pollution and a deteriorating quality of life.

The proposed site is in "high" and "very high" fire hazard severity zones. And it's directly on top of California's two major earthquake faults. The area was rated by the U.S. Geological Survey as having the highest level of earthquake hazard.

The county and its taxpayers will be on the hook for millions to provide basic public and emergency services to this remote area.

Instead of allowing isolated sprawl development on irreplaceable grasslands in an area at extremely high risk for fires and earthquakes, L.A. should focus on creating safe housing and economic opportunities in or near existing cities.

Please say no to Centennial: It's the wrong vision for L.A.

H.21-1

Responses to Comment Letter H.21
Form Letter 2
Various Dates

Response to Comment H.21-1:

A form letter was prepared by an unknown source and was made available to the public for submittal via email. A total of 610 form letters were submitted via email. Of the 610 form letters submitted, 6 were duplicate form letter submissions. Within this form letter, commenters were encouraged to sign with their name as well as their city, state, and zip code. Based on this information, the geographic breakdown of the remaining form letter commenters is as follows:

1. 10 commenters within the Antelope Valley;
2. 503 commenters outside of the Antelope Valley, but within Los Angeles County;
3. 21 commenters within Kern County;
4. 65 commenters outside of Los Angeles and Kern Counties, but within California; and
5. 5 commenters outside of California.

The individual form letters can be found in Appendix A-2 of this Final EIR. The response to this form letter is as follows. Thank you for your comment and for your participation in this public process. This comment's characterization of the proposed Project is contrary to the Project's objectives and design features, which promote sustainability and discourage sprawl by implementing the Antelope Valley Area Plan (AVAP).

With respect to this comment's general concerns that the Project exemplifies poor, outdated land use planning, as stated throughout the Draft EIR, the Project is consistent with the AVAP, which was adopted by the Board of Supervisors in June 2015 and is a component of the Los Angeles County General Plan 2035 (General Plan).[3173] As explained in the AVAP's vision statement (Vision), "at the heart of the County's approach to community planning is the idea that the AVAP is an adopted version of the communities' aspirations for the future" which collectively "amount to a community vision, based on shared values and common goals."[3174] At its core, the Vision is intended to ensure that "[t]he growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment."[3175] The AVAP updates and supersedes the 1986 Antelope Valley Areawide General Plan (AVAGP), the previous community plan applicable to the Antelope Valley planning area.[3176]

3173 DRP 2015, p. 1-2
3174 *Id.,* p. I-5
3175 *Id.,* p. I-6
3176 *Ibid.*

In preparing the AVAP, the County undertook an extensive and inclusive eight-year community participation program that commenced in the fall of 2007 and included a series of 23 community meetings.[3177] At these community meetings, area residents and other stakeholders worked with County planners to develop a shared vision for the future that prioritized the participant recommendations and form the foundation of the AVAP.[3178] This community vision is embodied in the AVAP's "Rural Preservation Strategy."

The planning policies and environmental benefits of the Rural Preservation Strategy are closely aligned with the regional land use policies described in the 2016-2040 Regional Transportation Plan/Sustainable Communities Plan (2016 RTP/SCS) prepared by the Southern California Association of Governments (SCAG). For example, the AVAP reduces the projected number of new residential housing units in the planning area by 62 percent, locates housing units closer to jobs, and increases the AVAP's jobs/housing ratio from 0.18 to 1.3 at buildout, as compared to the 1986 AVAGP it replaces.[3179] As a result, implementation of the AVAP would generate just 17,065,721 vehicle miles traveled (VMT), a 50 percent reduction below the 33,787,619 VMT generated by the 1986 AVAGP.[3180]

The Commenter's claim that the Project would have an average trip length of over 45 miles is inaccurate. As described on Table 3-5: Project VMT and Trip Length Summary, on page 3.9 of the Traffic Study included in Appendix 5.10-A of the Draft EIR, states that the Project would generate an average trip length of 25.5 miles, which takes into account the 3.4-mile average trip for internal Project-related trips, and the 45.9-mile average trip for external Project-related trips. Table 3-2 of the Traffic Study included in Appendix 5.10-A of the Draft EIR shows an estimate of average daily trips (ADT) and peak hour trips for the Specific Plan area and the corresponding internal and external components that produce the overall internal trip capture percentages derived by the North County sub-area traffic model. Many of the internal trips are directed to locally serving uses such as schools and retail shopping centers, and the approximately 10.1 million square feet of commercial office, shopping center and industrial land uses will provide jobs, many of which are anticipated to be filled by future residents of Centennial. Overall, around 65 percent of the daily trip generation (as measured by tripends [i.e. total trips entering and leaving a location]) will be internal, as shown in Table 3-2. When converted to trips (travel between two points [i.e. one origin and one destination]), this translates to 48 percent of the total Project trips being internal since each internal trip is counted twice in the trip generation (i.e., one internal trip has two internal tripends, a beginning tripend and an ending tripend).

As discussed in the Traffic Study included in Appendix 5.10-A of the Draft EIR, the VMT estimate represents a worst-case assumption without taking into account the anticipated mode shift of residents using alternative travel modes such as walking, biking, transit, and neighborhood electric vehicles (NEVs). Similarly, an estimate of VMT for project trips that leave the Project site has been made using the North County sub-area traffic model. This gives the total VMT produced by the Project at a regional level, along with the average trip

3177 DRP 2015, p. I-5
3178 *Ibid.*
3179 DRP 2014a, p. 7-7
3180 *Ibid.*

length. The Project's total VMT estimate is the sum of the VMT for the internal trips and the external trips, as shown in Table 3-5. Note that this VMT, as calculated by the traffic model, does not reflect the VMT reducing Transportation Demand Management (TDM) measures to be implemented by the Project (see PDF 10-1 and MM 10-26 of the Draft EIR). The following is a listing of some key TDM elements that help form the Project's overall circulation plan:

- Rideshare incentives/Rideshare matching
- Parking management and parking cash-out policies
- Preferential parking or parking subsidies for carpoolers
- Promotion of Guaranteed Ride Home program
- Telecommuting incentives
- Flexible work schedules
- Integrated mobility hubs
- Other First Mile/Last Miles Strategies
- Incentives for employees who bike to work
- Investments in bicycling and walking infrastructure
- Promote active transportation options for trips less than 3 miles, such as biking or using an electric vehicle
- Community Delivery Program
- Electric Vehicle Service Stations

While the TDM elements would result in a reduction in volume of single occupancy vehicles, at the direction of the County, for purposes of the Draft EIR and Traffic Study analysis, no trip reductions were made to the baseline Project trip generation estimates. In summary, the Project is specifically designed to protect the natural environment by implementing an attractive and compact development pattern that places homes near jobs and commercial uses, all connected by a multi-modal circulation system that will reduce VMT.

With respect to this comment's general concerns regarding native grasslands and wildflowers, please see Section 5.7, Biological Resources, of the Draft EIR, which disclosed the Project's potential direct and indirect impact to native grasslands and determined that such impacts would be mitigated to a less than significant level, while cumulative impacts would be significant after mitigation.[3181] As stated in MM 7-10 in the Draft EIR in Section 5.7, Biological Resources, mitigation ratios of at least 2:1 are required for grasslands.[3182] The ratio of 2:1 was developed over multiple years of discussion and grassland studies, as listed in Table 5.7-2 on page 5.7-19 of the Draft EIR. The grassland studies conducted on the Project site and in portions of the mitigation lands provide a detailed understanding of the botanical composition of grasslands within these areas as summarized on pages 5.7-25 to 5.7-27, 5.7-42 to 5.7-47, and 5.7-158 to 5.7-160 of the Draft EIR. These studies indicate roughly 26 percent of the grasslands on site would be considered native grasslands and 74 percent would be considered non-native grasslands based on the most common definitions. The 2:1 ratio was applied to all 6,415 acres of impacted grasslands, rather than to the smaller native grassland acreages scattered on the Project site and surrounded by non-native grassland, as a way to provide for a greater total grassland mitigation obligation as well as a more like-for-

[3181] DRP 2017, pp. 5.7-158 and -162
[3182] *Id.,* p. 5.7-180

like mitigation scenario by avoiding preservation of many small patches of widely distributed native grasslands, as discussed in the first paragraph on page 5.7-160 of the Draft EIR. Furthermore, sampling studies and assessments of the 14,908 acres of preserved grasslands indicate a high degree of similarity to that of the impacted grasslands.[3183]

Grassland and wildflower studies of the proposed mitigation areas (including on-site mitigation lands, the offsite mitigation lands included in the Draft EIR, and the additional off-site mitigation lands included in this Final EIR), indicate an acceptable degree of similarity in vegetation species composition at varying degrees consistent with Project impact areas.[3184] Furthermore, the 14,375 acres are preserved as part of a contiguous open space area inclusive of 28,171 additional acres of other vegetation types in a mosaic of regional biological resources. In addition, the 14,375 of preserved grasslands is actually greater than the 12,832 acres of grasslands which would be required with the 2:1 resulting in 2,076 additional acres of grassland preservation. The additional acreage provides still greater assurance of full mitigation for the Project's grassland and wildflower field impacts.

The Project's Mitigation Preserve would provide for the preservation of grasslands and wildflower fields, as demonstrated in the Draft EIR. As shown on revised Exhibit 5.7-10, Mitigation Preserve, included in this Final EIR following page 3-116 (Volume 2) and originally on page 5.7-135 of the Draft EIR, immediately adjacent lands that represent as close a proximity as feasible are captured within the Mitigation Preserve. The lands, including the grasslands within them, are not only contiguous with the Project site, but also with other open space lands set aside by the Tejon Ranch Company. As described in Appendix 5.7-C of the Draft EIR, a reconnaissance survey of the Mitigation Preserve in 2015, conducted during peak bloom as part of a Mitigation Lands Review, confirmed that native wildflower fields, larger than any observed on the Projects site, were observed within the mitigation preserve.[3185]

With respect to the comment's concern about the Project harming condors, the California condor is a federally and State-listed species and a California fully protected species, and no condor will be killed; please see Section 5.7 of the Draft EIR. In addition, in order to be responsive to comments from the California Department of Fish and Wildlife (CDFW) and U.S. Department of Fish and Wildlife (USFWS) comments regarding the addition of Project efforts to further reduce any potential adverse effects of the Project on the California condor, MM 7-6 on Draft EIR pages 5.7-177 and 5.7-178 is revised in regard to construction monitoring, utility hazards, condor educational curriculum, microtrash, condor deterrent activities, and condor tracking as described in response to Comment B.4-21. See also, responses to Comments A.3-3, A.3-4, A.3-5, A.3-7, B.4-20, B.4-21, B.4-22, and B.4-23 of this Final EIR.

With respect to the comment's concern about the Project harming bald eagles, the documented lack of observations on site, the infrequent detections of this species adjacent to the site, and the lack of any known nesting in the area, as outlined in the Draft EIR, attests

[3183] *Id.,* pp. 5.7-135 to -138, PDFs 7.1 and 7.2
[3184] *Id.,* Appendix 5.7-B, Plant-8
[3185] *Id.,* Appendix 5.7-C

to the limited utilization of the Project area by bald eagle. Further corroboration is provided in the recent publication regarding the breeding birds of Los Angeles County which described bald eagles as rare migrants and winter visitors in the Project area from November to April, and mostly occurring around the larger lakes in the northwest part of the County.[3186] In fact, prior to the 2016-2017 breeding season, when a pair of bald eagles successfully nested in the San Gabriel Mountains, approximately 65 miles southwest of the Project site, bald eagles had not been detected nesting on the mainland in Los Angeles County since 1930.[3187] This supplemental information further demonstrates the extremely limited use of the Project area by bald eagle.

With respect to the comment's concern about the Project harming the kit fox, this species does not occur on the Project site or in the Project region. The Project will not impact the kit fox.

With respect to the comment's concern about the Project harming pronghorn, the species is not included on the CDFW list of Special Animals. However, the Draft EIR takes a conservative approach and assesses impacts on the pronghorn stating on page 5.7-153 of the Draft EIR "although not classified as a special status species (CDFW 2017b), the relatively small population of reintroduced pronghorn antelope on the Project site is considered of interest due to limited numbers and historical presence..." The pronghorn CEQA impact analysis provided in Draft EIR is appropriate and consistent with standard practice for sensitive species as well as best available scientific information, including on-site observations. Additional population distribution information has been obtained from the Tejon Ranch Conservancy since release of the Draft EIR for review. Data show a distribution concentrated northeast of the Project site, and within the Mitigation Preserve, with much more infrequent occurrence on the Project site (see new Exhibit B.4-34). New exhibits are included in Section 3.0, Draft EIR Clarifications and Revisions, of this Final EIR. The Draft EIR adequately assesses pronghorn impacts and the determination of less than significant impacts remains appropriate inclusive of all available species data. In addition, as stated on page 5.7-153 of the Draft EIR, as part of the Ranch-wide Management Plan[3188], which is an implementation tool of the Ranch-Wide Agreement, the Project Applicant will work with the Tejon Ranch Conservancy to identify and implement potential enhancement measures, which could focus on enhancing pronghorn fawn survivorship with GPS-tracking devices and other measures to evaluate and minimize losses from coyote predation; completing further evaluation of modeling tools at a site-specific level, and incorporating volunteer involvement with supportive activities such as fencing retrofits.

With respect to this comment's general concerns regarding sprawl development, greenhouse gas and climate change, air pollution, and a deteriorating quality of life, according to SCAG, 'smart growth' is a term that covers a range of development and conservation strategies that help protect the natural environment and make communities

[3186] Allen et al. 2016
[3187] *Ibid.*
[3188] Final EIR Appendix 5.7-D

more attractive, economically stronger, and more socially diverse".[3189] The Commenter's claim that the Project represents exemplifies outdated land use planning because of the new vehicle trips per day and average trip length disregards the fact that the Project is consistent with, and implements, regional and County plans to strategically locate future growth in a manner that both achieves statewide GHG reduction goals and relieves the potential adverse and social effects of focusing too much future growth in both agricultural areas and in infill, transit oriented areas.

As an initial matter, the County disagrees with this comment's assertion that the Draft EIR fails to adequately analyze, disclose and mitigate the Project's GHG emissions. The Project's potential GHG impacts were fully quantified and analyzed in Section 5.21, Climate Change, of the Draft EIR. Moreover, the Draft EIR includes mitigation measures which require compliance with a non-exclusive list of laws and regulations requiring GHG reductions in equipment, activities, facilities, and services associated with the Project (MM 21-20) The Draft EIR also includes 45 additional mitigation measures to reduce GHG emissions from project operations and/or construction activities (MMs 10-1, 10-25, 10-26, 11-1 through 11-7, 13-6, 14-1, 17-9, 17-10, 18-1, 18-2, 19-1 through 19-5, 20-2.1, 20-2.2, 20-3.1 through 20-3.3, and 21-1 through 21-19). In addition, the Specific Plan includes additional commitments to sustainable design and operational practices which minimize GHG emissions, as detailed in response to Comment F.8-204, and mitigation measures have been revised in response to comments on the Draft EIR to further reduce the Project's GHG emissions. See revised and added mitigation measures as set forth in responses to Comments F.8-95, F.8-204, F.2-2, F.2-5, F.3-29, F.3A-46, and F.8-189.

Moreover, Centennial's unique land use plan is designed to incorporate the main principles of "smart growth" and thus promotes compact, transit-oriented, walkable, bicycle-friendly communities.[3190] The Town Center of Centennial is located in Village 3 and is the "downtown" area of the Project. Villages 1, 2, 5, and 7 have a Village Core.[3191] Villages 6, 8, and 9 have a Neighborhood Center. As shown in Draft EIR Exhibit 4-3, Centennial Project – Villages and Core Areas, 100 percent of all residential development will be located within ¼ mile walking distance of a park, trailhead, club house or other public amenity; and an 80 percent average, but no less than 50 percent of residential units will be located within ½ mile of a Village Core or the Town Center.[3192] Village Cores will have a public gathering space (e.g., square or plaza) of 10,000 square feet or more, with street frontage on at least one side and at least two points of access from a sidewalk, trail, or other pathway.[3193] The Town Center will have a public gathering space of 1 acre or more, with street frontage on at least two sides.[3194] Additionally, 30 percent of Village 3 residential units will be within the Town Center; and 15 percent of the residential units within Villages 1, 2, 5, and 7 will be

3189 Southern California Association of Governments (SCAG). 2016d (April). *Final Environmental Impact Report for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (SCH #2015031035) (p. 3.11-11). Los Angeles, CA: SCAG. http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx.

3190 DRP 2017, p. 4-16

3191 *Ibid.*

3192 *Id.,* 4-17

3193 *Ibid.*

3194 *Ibid.*

within the Village Core.[3195] High-density residential uses will be located adjacent to commercial centers and the Specific Plan's Mixed-Use Overlay areas permit residential uses in commercial centers, to further integrate residential and retail uses.[3196] The Project also proposes to implement a community intranet system to provide easily accessible information to facilitate telecommuting and non-automotive transit mode use, further reducing demand for SOV travel.[3197] All of these design features encourage active transportation modes (e.g., walking and bicycling) and minimize use of single occupancy vehicles (SOV) for trips internal to the Project site.

The Project's Mobility Plan proposes a multi-modal transportation system with various components (Roadways, Transit, Bicycle, and Pedestrian) and is designed to provide safe and efficient mobility throughout the community.[3198] Centennial will implement a system of complete streets and multi-mode, non-motorized transportation facilities consistent with the California Complete Streets Act of 2008 and in accordance with applicable County policies.[3199] The objective of complete street design is to provide safe, efficient and accessible mobility for all motorized and non-motorized users, including motorists, cyclists, pedestrians, and transit riders.[3200] Non-motorized transportation planning elements are also integrated into the Centennial Circulation Plan to encourage non-automotive transit modes.[3201]

The Project's Mobility Plan further requires the formation and funding of a Transportation Management Agency (TMA) prior to the issuance of the Project's first occupancy permit.[3202] The TMA is responsible for monitoring the form of travel, or transit modes, used by the people who live and work in Centennial. Consistent with state and regional transportation, air quality and greenhouse gas planning objectives that focus on reducing SOV trips, Centennial must meet the following mobility performance standards: (1) a minimum of 20 percent of total daily peak morning and afternoon external (e.g., commuting) trips must be completed by using non-SOV transit modes; and (2) a minimum of 30 percent of total daily internal (e.g., local) trips must be completed by using non-SOV transit modes.[3203]

The AVAP substantially limits the potential for "urban sprawl" development patterns in the Antelope Valley by focusing new development into compact and sustainably designed mixed-use Economic Opportunity Area (EOA) communities that place houses in close proximity to jobs and commercial uses while expanding SEA boundaries and preserving wildlife movement corridors and agricultural land.[3204] Consistent with the AVAP's Rural Preservation Strategy, the Project would ensure the preservation and management of natural resources and open space in and around the Project site. Specifically, no Project development would occur within the 3,866 acres of the San Andreas Significant Ecological

3195 *Ibid.*
3196 *Id.,* p. 4-20
3197 *Id.,* p. 4-35
3198 *Id.,* p. 4-30
3199 *Ibid.*
3200 *Id.,* p. 4-31
3201 *Ibid.*
3202 *Id.,* p. 4-30
3203 *Ibid.*
3204 DRP 2014a, p. 7-7

Area (SEA 17) located on the Project site, which land would be permanently protected by a conservation easement provided by the Applicant/Developer.[3205]

Moreover, all buildings within the Specific Plan will be required to comply with state, regional, and local laws applicable to their design and construction including, without limitation, Pavley Motor Vehicle Standards (AB 1493); Low Carbon Fuel Standard;[3206] Title 24 (part 6 [Energy Code] and part 11 [CALGreen Code]) of the California Code of Regulations; Renewable Portfolio Standard (SB X1 2 and SB 350); Natural Gas Cooking Stoves and Fireplaces (SCAQMD Rule 445); Solid Waste Diversion (AB 939, AB 341, AB 1826, SB 1383); statewide reduction in potable urban water usage of 25 percent relative to water use in 2013 (Executive Order B-29-15); Model Water Efficient Landscape Ordinance (MWELO);[3207] California Water Code;[3208] EPA and NHTSA GHG and CAFE standards for passenger cars, light-duty trucks, and medium-duty passenger vehicles[3209] and for medium- and heavy-duty vehicles;[3210] Cap-and-Trade Program for Electricity, Stationary Sources, and Fuels;[3211] Advanced Clean Cars Program;[3212] Under Inflated Vehicle Tires;[3213] Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Regulation;[3214] Management of High Global Warming Potential Refrigerants for Stationary Sources;[3215] Small Containers of Automotive Refrigerant;[3216] High-Global Warming Potential Greenhouse Gases in Consumer Products;[3217] Los Angeles Tree Planting Ordinance;[3218] Los Angeles Green Building Standards Code;[3219] and Los Angeles County Community Climate Action Plan.

In addition, the Project would be subject to Title 24 and CALGreen Code energy efficiency standards. However, as discussed in the Specific Plan and Section 5.21, Climate Change, the Project has committed to compliance with CALGreen voluntary measure A4.203.1.2.1 for low-rise residential buildings, resulting in buildings that would exceed 2016 Title 24 requirements by 15 percent (see PDF 11-3 in Section 5.11, Air Resources), and with CALGreen voluntary measure A5.203.1.2.1 for non-residential buildings and residential buildings taller than four stories, resulting in buildings that would exceed 2016 Title 24 requirements by 10 percent (PDF 11-2). Renewable energy produced on the Project site will be primarily rooftop solar, and a minimum of 50 percent of the Project's anticipated electricity demand must be satisfied from on-site renewable energy generation (PDF 21-3). With this approach, development within the Specific Plan will meet and exceed the standards

3205 DRP 2017, p. 4-43
3206 CCR, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 7, Section 95480 et seq.
3207 *Id.,* Title 23, Division 2, Chapter 2.7
3208 *Id.,* Division 6, Part 2.10, Sections 10910–10915
3209 75 Federal Register (FR) 25324–25728 and 77 FR 62624–63200
3210 76 FR 57106–57513
3211 CCR, Title 17, Division 3, Chapter 1, Subchapter 10, Article 5, Section 95801 et seq.
3212 *Id.,* Title 13, Division 3, Chapter 1, Articles 1, 2, 6 (parts), Chapter 2, Articles 1, 2.1, 2.3, 2.4 (parts), Chapter 4.4 (parts), Chapter 8 (parts)
3213 *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 8, Section 95550 et seq.
3214 *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 1, Section 95300 et seq.
3215 *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5.1, Section 95380 et seq.
3216 *Id.,* Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5, Section 95360 et seq.
3217 *Id.,* Title 17, Division 3, Chapter 1, Subchapter 8.5, Article 2
3218 Los Angeles County Code, Title 22, Division 1, Chapter 22, Part 20, Sections 22.52.2100 et seq.
3219 *Id.,* Title 31, Chapter 1, Sections 100 et seq.

of 2016 CALGreen Tier 1 as well as the requirements of the County's Green Building Ordinances.

For the reasons discussed above, the Project cannot fairly be described as "sprawl." As clearly demonstrated by the its long planning history at the regional and County level, the Project is anything but "uncoordinated growth" undertaken without regard for its environmental consequences. The Project has been carefully designed to promote regional "smart growth" planning principles established by the 2016 RTP/SCS and the AVAP's Rural Preservation Strategy and will aid the County in its effort to accommodate its fair share of the regional housing need in a manner that reduces reliance on the automobile, reduces per capita GHG emissions, and promotes public health. The Project will also be required to implement an extensive list of Green Development design measures and to comply with and, in some cases exceed, applicable laws mandating efficient building design and construction. Finally, the Project will permanently preserve thousands of acres of sensitive habitat. By any measure, the Project is not "sprawl", particularly when viewed from a regional perspective that includes full consideration of regional planning priorities.

With respect to this comment's general concerns regarding fire hazard severity zones, the Project's potential impacts related to fire safety and fuel modification are discussed in Section 5.3, Hazards and Fire Safety, and Section 5.16, Fire and Law Enforcement. With adherence to requirements for fuel modification zone management (MM 3-9) and emergency access (MM 3-7), the Project's potential impact related to wildfires would be less than significant. MM 3-9 requires property owner notification of their responsibilities for maintaining the fuel modification zone(s) on their property. The Project would not result in significant impacts related to proximity of a land use representing a potential fire hazard.

The Project includes conceptual site locations for up to four new fire stations on the Project site. These new fire stations are projected to provide an average five-minute response time for the first arriving unit for fire and eight minutes for the advanced life support (paramedic) unit on the site at Project buildout. This is consistent with the County of Los Angeles Fire Department's (LACFD's) goals for response times in urban areas. Ultimately, the LACFD would approve the final station site locations, and the Project Applicant/Developer would construct and equip the fire stations (MM 16-3). The LACFD has indicated that the proposed fire stations on the site would provide adequate fire service to the Project.

With respect to this comment's general concerns regarding earthquake faults and hazards, the presence of on-site, nearby, and regional faults is clearly disclosed in Section 5.1, Geotechnical. As discussed on pages 5.1-16 and 5.1-17, consistent with State regulations, there would no building on or within the required setback of the Alquist-Priolo Earthquake Fault Zone for the San Andreas Fault. The setback zone for the San Andreas Fault is incorporated into the Geologic Safety Zone, which also establishes building setbacks for the two unnamed on-site faults. Due to the proximity of both the San Andreas Fault and Garlock Fault to the Project site, a fault research company called Earth Consultants International (ECI) conducted a detailed fault investigation on the Project site and evaluated potential hazards as a result of fault locations in relation to the Project site and planned development

areas.[3220] Per the Geocon report, earthquakes that might occur on the San Andrea Fault Rift Zone are potential generators of significant ground accelerations at the site (0.73 g for a 10 percent probability in 50-year occurrence) should an earthquake on the fault occur.[3221] However, foundation systems can be designed to withstand these relatively high ground accelerations, and secondary impacts such as liquefaction can be mitigated by remedial grading, structural design and foundations or ground improvement techniques; active fault zones including this one can also be mitigated by implementing setback zones from Alquist-Priolo Earthquake Fault Zones.[3222] Accordingly, as shown on Draft EIR Exhibit 5.1-2, the Project has been designed to avoid development in areas near the San Andreas Earthquake Fault Zone, which are instead proposed as open space and drainage areas.[3223]

With respect to this comment's general concerns regarding public and emergency services, the Project site is situated near the junction of Interstate 5 and the Northwest SR-138 Improvement Project, which links western Los Angeles County the major communities of Palmdale and Lancaster.[3224] Thus, the Project site will not require major off-site roadway extensions to provide access to regional freeways. As shown on Draft EIR Exhibit 4-18, there are existing gas, power and telecom transmission facilities to serve the Project located on or immediately adjacent to the Project site. The Project will also construct two on-site wastewater treatment and recycled water distribution facilities to minimize potable water demand to treat Project wastewater and supply recycled water to the Project site.[3225] To ensure adequate potable water service, the Applicant/Developer will design, permit, finance, and construct an on-site water treatment plant adjacent to the West Branch of the California Aqueduct, which is located on-site.[3226] School, fire, police, emergency medical and library facilities needed to serve the Project will all be constructed on site, and in some cases, will be available to also serve existing Mountain Communities in accordance with existing mutual aid agreements.[3227] Finally, none of the Project's backbone infrastructure will be sized to accommodate growth beyond that which is proposed by the Project.[3228]

Under Project conditions, there will be far greater access to fire protection and emergency services in the vicinity of the Project site than currently exists. Such access will contribute to County of Los Angeles Fire Department (LACFD) performance of its obligations under the *Cooperative Fire Protection Agreement Between The County of Los Angeles Fire Department and The U.S. Forest Service Angeles National Forest* approved by the Los Angeles County Board of Supervisors on December 20, 2016 (Mutual Aid Agreement). The purpose of the Mutual Aid Agreement is to provide for cooperation between LACFD and U.S. Forest Service Angeles National Forest (ANF) in the prevention, detection, and suppression of wildland fires, fuels treatment and prescribed fires with both agencies' respective fire protection areas. The Mutual Agreement also describes the conditions in which "mutual aid" periods

3220 DRP 2017, Appendix E of Appendix 5.1-A; *Id.,* Appendix 5.1-A, p. 8
3221 *Id.,* Appendix 5.1-A, p. 13
3222 *Ibid*.
3223 *Id.,* p. 5.1-16
3224 *Id.,* p. 4-2
3225 *Id.,* p. 4-59
3226 *Id.,* p. 4-55
3227 *Id.,* p. 4-75
3228 *Id.,* p. 5.8-22

are established to provide resources to each on a non-reimbursable basis, as well as the conditions of "Assistance by Hire" on a reimbursable basis. The Project's fire service improvements described above will significantly enhance the LACFD's ability to perform its obligations under the Mutual Aid Agreement to the benefit of the Angeles Forest, further reducing the risk of forest fires in the vicinity of the Project site.

Additional Comments

Out of the 610 form letter submittals, 40 were modified slightly by the Commenter to include additional comments. These additional comments are summarized below.

- Reject the Project.
- No sprawl.
- Need sustainable development.
- The Project destroys habitat, wildlife, and grasslands.
- Concerns about air quality, traffic, and water use/availability.
- Concerns about wildfire and seismic hazards.
- Need infill and affordable housing.
- Concerns about insufficient infrastructure.
- This is not Centennial's first application to build.

The following responses address each of the above summarized comments.

1. Reject the Project.

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

2. No sprawl.

As discussed previously, the Project's objectives and design features promote "smart growth" and discourage sprawl by implementing the AVAP.

3. Need sustainable development.

The Project includes a Green Development Program, which is intended to meet or exceed state, regional, and local requirements for energy efficiency and green building ordinances.[3229] The Centennial Green Development Program's Green Building component,

[3229] *Id.*, Appendix 4.0-A, p. M-6

found in Appendix 2-A of Appendix 4.0-A to the Draft EIR, requires all residential and non-residential development to comply with CALGreen Code Mandatory Measures, as well as the voluntary CALGreen Tier 1 measures, and to comply with the Los Angeles Green Building Ordinances.[3230] Additional measures are also included to further improve energy, water and material management conservation and efficiency, and to assure health building materials and designs. Sustainable and resiliency features will be incorporated in the design from the earliest stages through the final buildout.[3231] The Green Development Program is adopted by resolution and incorporates the County's Green Building Ordinances with respect to development for the Project Site.[3232]

4. The Project destroys habitat, wildlife, and grasslands.

Various mitigation measures, including the dedication of thousands of acres of open space to be preserved and managed in perpetuity, are included in Section 5.7.7, Mitigation Measures, in the Draft EIR[3233] to reduce impacts to biological resources to a less than significant level. Cumulatively considerable significant impacts are acknowledged for the biological issues of native perennial grasslands and regional wildlife movement, as discussed in Section 7.0, Cumulative Impacts, of the Draft EIR.

Additionally, the comment's concerns regarding native grasslands, wildflowers, and harm to wildlife species were addressed earlier in this response to Comment G.32-1. Please also see Section 5.7, Biological Resources, of the Draft EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with the Antelope Valley Area Plan Environmental Impact Report (AVAP EIR) (SCH# 2014061043). The AVAP is an area plan that is a subset of the County of Los Angeles General Plan. The Project is also within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of biological resources can be found in Section 5.4, Biological Resources, of the AVAP EIR and Section 3.4, Biological Resources, of the RTP/SCS EIR.

5. Concerns about air quality, traffic, and water use/availability.

As addressed previously, with respect to the comment's concerns about transportation and traffic, air quality, and water supplies and drought, please see Sections 5.10 (Traffic, Access,

3230 *Id.,* Appendix 4.0-A, p. 4 of Appendix 2-A
3231 *Id.*, Appendix 4.0-A, p. M-6
3232 *Id.,* p. 2-60
3233 *Id.,* pp. 5.7-173 to -194

and Circulation), 5.11 (Air Resources), and 5.18 (Water Resources) of the Draft EIR for a complete analysis of the Project's related potential impacts.

The Project is within the boundaries of and is consistent with AVAP and is within the boundaries of and is consistent with the Southern California Association of Governments 2016-2040 RTP/SCS Environmental Impact Report (RTP/SCS EIR) (SCH# 2015031035), the metropolitan planning organization for the region. As these documents contain the environmental analyses for the planning documents applicable to the Project area and considered on a program level, additional information that is relevant to the Project on the topic of biological resources can be found in these documents: Sections 5.3 (Air Quality), 5.16 (Transportation and Traffic), and 5.17 (Utilities and Service Systems) of the AVAP EIR, and Sections 3.3 (Air Quality), 3.17 (Transportation and Traffic), and 3.18 (Utilities and Service Systems) of the RTP/SCS EIR.

6. Concerns about wildfire and seismic hazards.

As discussed previously, the Project's potential impact related to wildfires would be less than significant and the proposed fire stations on the site would provide adequate fire service to the Project. With regard to the comment's concerns regarding seismic hazards, the Project has been designed to avoid development in areas near the San Andreas Earthquake Fault Zone, which are instead proposed as open space and drainage areas, as further discussed in Section 5.1, Geotechnical, of the Draft EIR.

7. Need infill and affordable housing.

When it adopted the 2012 RTP/SCS, SCAG ultimately settled on a balanced land use plan that assumes a significant increase in multi-family housing to be constructed in urban infill areas and so-called High Quality Transit Areas (HQTA), but also targets some suburban and rural pockets of the region for additional housing and employment growth.[3234] Under SCAG's balanced land use plan, 68 percent of all new homes in the region would be constructed as multi-family units, and over 50 percent of new housing and employment growth would be located in urban infill areas and HQTAs.[3235] The balanced land use plan also provides for approximately 33 percent of all new housing units to be constructed in suburban and rural residential areas of the region.[3236]

SCAG has carefully considered land use policies that would promote aggressive regional infill development, but ultimately determined that the balanced land use plan described in the 2016 RTP/SCS better protects low income populations from the adverse effects associated with aggressive infill development, most notably gentrification while also achieving the region's GHG emissions reduction targets. SCAG's findings regarding the adverse environmental, social and economic impacts of aggressive infill development are consistent with recent research on the subject. While infill development is an important component of

[3234] SCAG 2012a, pp. 129, 130
[3235] SCAG 2011, p. 2-27
[3236] *Id.,* p. 2-30

regional land use policy designed to achieve mandated emissions reductions, the environmental impact reports for the 2012 and 2016 RTP/SCS documents demonstrate that too much infill development risks significant adverse environmental and social impacts within the communities targeted for such development.[3237]

With regard to the comment's concerns about affordable housing, the proposed Project does include affordable housing. Per MM 21-14, "Ten percent of all homes in Centennial communities that permit housing, with the exception of the lowest density area (Community 8-2) will be affordable, in conformance with the Affordable Housing Implementation Plan..."[3238] Per Specific Plan Section 3.13, the affordability status of homes will be annually monitored through the County of Los Angeles who shall report to the HCD and Los Angeles Community Development Commission.[3239] The Specific Plan specifies that the units shall be constructed simultaneously with overall residential development.[3240]

8. Concerns about insufficient infrastructure.

As discussed previously, the all infrastructure required for the proposed Project either currently exist in the Project area or would be constructed under the proposed Project. All infrastructure to be constructed under the proposed Project has been analyzed in the Draft EIR.

9. This is not Centennial's first application to build.

The comment states that "the application to build [the Centennial Project] is not new" and notes that the "disapproved application" should be reviewed by the Board of Supervisors. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

[3237] SCAG 2011, pp. 4-4, -37; SCAG 2012a, p. 129; SCAG 2012d, p. 5-63; SCAG 2016a, p. 69
[3238] DRP 2017, p. 5.21-91
[3239] *Id.,* Appendix 4.0-A, p. 3-101
[3240] *Id.,* Appendix 4.0-A, p. 3-102

I. Time Extension Comments

CENTENNIAL

at TEJON RANCH

From: Helen Henry <helenhenry@mac.com>
Sent: Saturday, July 08, 2017 1:54 PM
To: Samuel Dea
Subject: Extension please

Dear Mr. Sackett and Mr. Dea,

I am requesting the extension of the Centennial Draft Environmental Review for an additional 30 days. The document is 2,000 pages long, and the public needs more time to make comments, since this project will pose long-term significant impacts to our rural community, and across the Antelope Valley. I.1-1

Sincerely,
Helen Henry

Response to Comment Letter I.1
Helen Henry
July 8, 2017

Response to Comment I.1-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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From: Alice Wollman <AliceWollman@roadrunner.com>
Sent: Saturday, July 08, 2017 2:43 PM
To: Jodie Sackett; Samuel Dea
Subject: Subject: Extension of Centennial DEIR deadline

Dear Mr. Sackett and Mr. Dea,

I am requesting the extension of the Centennial Draft Environmental Review for an additional 30 days. The document is 2,000 pages long, and the public needs more time to make comments, since this project will pose long-term significant impacts to our rural community, and across the Antelope Valley. I.2-1

Sincerely,

Alice Wollman
Sommer Appraisal Service
12304 Santa Monica Boulevard
Suite 300
Los Angeles, California 90025
(310) 207-4857, extension 137

Response to Comment Letter I.2
Alice Wollman
July 8, 2017

Response to Comment I.2-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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From: jane randall <jr_ranch@live.com>
Sent: Saturday, July 08, 2017 3:56 PM
To: Jodie Sackett; Samuel Dea
Subject: Extension of Centennial DEIR deadline PLEASE

Email: JSackett@planning.lacounty.gov
sdea@planning.lacounty.gov

Subject: Extension of Centennial DEIR deadline

Dear Mr. Sackett and Mr. Dea,

I am requesting the extension of the Centennial Draft Environmental Review for an additional 30 days. The document is 2,000 pages long, and the public needs more time to make comments, since this project will pose long-term significant impacts to our rural community, and across the Antelope Valley. I.3-1

Thank you for this consideration. Several of my neighbors tried to attend the Gorman Elementary School meeting. . . but wasn't possible. We all have busy lives, trying to stay afloat.

Sincerely,
Jane Randall

Response to Comment Letter I.3
Jane Randall
July 8, 2017

Response to Comment I.3-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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From: Samuel Dea <sdea@planning.lacounty.gov>
Sent: Monday, July 10, 2017 7:00 AM
To: Kristin Starbird
Subject: FW: Extension of Centennial DEIR deadline

One more.

From: Lakes & Valleys Gazette [mailto:lvgazette@hotmail.com]
Sent: Sunday, July 09, 2017 2:40 PM
To: Jodie Sackett <jsackett@planning.lacounty.gov>; Samuel Dea <sdea@planning.lacounty.gov>
Subject: Extension of Centennial DEIR deadline

Dear Mr. Sackett and Mr. Dea,

I am requesting the extension of the Centennial Draft Environmental Review for an additional 30 days. The document is 2,000 pages long, and the public needs more time to make comments, since this project will pose long-term significant impacts to our rural community, and across the Antelope Valley. I.4-1

Sincerely,
Debbie Ehms
Editor - Lakes & Valleys Gazette

Lakes & Valleys Gazette
P.O. Box 366
Lake Hughes, CA 93532
661.917.5996

Response to Comment Letter I.4
Lakes & Valleys Gazette
July 9, 2017

Response to Comment I.4-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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From: Kristin Starbird
Sent: Monday, July 10, 2017 11:29 AM
To: Joan Kelly; Ashley McCoy
Subject: FW: Extension of Centennial DEIR deadline

Kristin L. Starbird
PSOMAS | Balancing the Natural and Built Environment
Vice President, Environmental Planning
225 South Lake Avenue, Suite 1000
Pasadena, CA 91101
626.351.2000 | www.Psomas.com

From: Samuel Dea [mailto:sdea@planning.lacounty.gov]
Sent: Monday, July 10, 2017 11:20 AM
To: Kristin Starbird <kristin.starbird@psomas.com>; Jodie Sackett <jsackett@planning.lacounty.gov>
Subject: FW: Extension of Centennial DEIR deadline

Here's a comment against an extension.

From: Richard Despain [mailto:richard.despain@gmail.com]
Sent: Monday, July 10, 2017 11:03 AM
To: Jodie Sackett <jsackett@planning.lacounty.gov>; Samuel Dea <sdea@planning.lacounty.gov>
Subject: Extension of Centennial DEIR deadline

Dear Mr. Sackett and Mr. Dea,

I am requesting the extension of the Centennial Draft Environmental Review NOT BE extended. As you know, this project has been in the planning stages for several long years, is well thought out and a much needed addition to the ever growing needs of the Antelope Valley region. Please expedite this plan as this will bring much needed economic growth and a new well planned community to Southern California.

I.5-1

All the Best,

Richard

--

G. Richard DeSpain
2108 Dallin Street
Lancaster, CA 93536
Cell 518-477-2012
richard.despain@gmail.com

https://www.linkedin.com/in/richard-despain-63710415

Response to Comment Letter I.5
G. Richard DeSpain
July 10, 2017

Response to Comment I.5-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. The comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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I.6

CENTER for BIOLOGICAL DIVERSITY Because life is good.

Protecting and restoring natural ecosystems and imperiled species through Science, education, policy, and environmental law

Via email

6/30/2017

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

RE: Request for Comment Deadline Extension on Centennial Project Draft Environmental Impact Report State Clearinghouse No. 2004031072 County Project No. 02-232

Dear Mr. Sackett,

On behalf of the staff, members and supporters of the Center for Biological Diversity (Center), we request a comment deadline extension of 90 days on the Centennial Project Draft Environmental Impact Report State Clearinghouse No. 2004031072 County Project No. 02-232. We believe that such an extension is warranted because the over 2,000 page draft EIR, the almost 2,000 page Specific Plan and the numerous technical appendices include highly technical, scientific and lengthy data sets and analyses that require thorough review that cannot be accomplished adequately by the July 17th, 2017 deadline. Processing and commenting on the relevant hydrological, biological, air quality and greenhouse gas data and analyses is taking much more time than the currently allotted comment period allows.

In order to provide meaningful, detailed public comments on this controversial project, the additional 90 days is needed for the public to adequately submit thoughtful comments. The current public comment timeframe coincides with the summer vacation season for many of the interested public and for that reason alone should be extended.

We know Los Angeles County is committed to making the voluminous draft EIR accessible to diverse communities and stakeholders and enable them to submit meaningful comments about its scope and impact. This goal cannot be fully realized without more time.

Please respond to us regarding this extension request by July 7th, 2017.

I.6-1

Arizona • California • Nevada • New Mexico • Alaska • Oregon • Washington • Illinois • Minnesota • Vermont • Washington, DC

Center for Biological Diversity
660 S. Figueroa, Suite 1000, Los Angeles, CA 90017
phone: (323) 654.5943 *fax:* (323) 650.4620 *email:* ianderson@biologicaldiversity.org
www.BiologicalDiversity.org

Respectfully submitted,

Ileene Anderson
Senior Scientist
ianderson@biologicaldiversity.org

/S/
John P. Rose
Staff Attorney
jrose@biologicaldiversity.org

cc via email: Richard Bruckner, Planning Director zoningldcc@planning.lacounty.gov; dslavin@planning.lacounty.gov

Response to Comment Letter I.6
Center for Biological Diversity
June 30, 2017

Response to Comment I.6-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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From: Three Points-Liebre Mountain Town Council <3pointsliebremountain@gmail.com>
Sent: Monday, July 10, 2017 10:48 AM
To: Jodie Sackett; Samuel Dea
Cc: Termeer, Donna
Subject: Centennial DEIR

Dear Mr. Sackett and Mr. Dea,

I have received several comments regarding the meeting at Gorman relating to lack of notification, and difficulties downloading information from the Centennial webpages at Regional Planning's website.

My concern is the Draft Environmental Impact Review document, due to these issues, and the 2,000 pages for the individual reader to review while tending work, family, and other commitments, makes the sixty day review period too short. I understand the sixty day period is longer than the law requires, but the Centennial Project has been moving forward for seventeen years with their own paid professional staff, and Regional Planning staff as well. Our council, residents of our community, and others who will experience this project's impacts have no such advantage.

On behalf of our council, I formally request a thirty day extension of the comment period to August 17th, so interested members of the public, and our council, may have more time to make pertinent and valuable comments on this massive project.

I.7-1

I appreciate your consideration. Please confirm receipt of our email, and keep us apprised of any decision on this matter.

Sincerely,
Susan Zahnter
Vice President
Three Points-Liebre Mountain Town Council

Response to Comment Letter I.7
Three Points-Liebre Mountain Town Council
July 10, 2017

Response to Comment I.7-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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From: merrylou nelson <merrylou.nelson@gmail.com>
Sent: Wednesday, July 05, 2017 4:49 PM
To: Jodie Sackett
Cc: Ginger Stout; Irwin Pascul; Julie Schuder; windie murphy; Jacki Ayer; Patric Hedlund; Robin Kennard; lsun@aqmd.gov
Subject: Centennial DEIR Review

Dear Mr. Sackett: I am writing you to request an extension of the DEIR review past the deadline of July 17, 2017. I believe that Planning is fast tracking the passage of this massive document. A 60 day review period is insufficient to accomplish this huge review. I have learned that the Planning Hearing officer meeting of June 29th was not well attended. No doubt some people could not find the school in Gorman! I believe that Planning should extend the review period and schedule additional local meetings with interested parties thus giving them an opportunity to digest this massive document and be allowed to add their valid comments. I.8-1

Mr. Sackett-I contacted the South Coast Air Quality District and spoke with Ms. L. Sun (909) 396-3308. She informed me that they have no records of being given distribution of the Centennial DEIR. That fact alone should give pause to the fact that if proper distribution of the DEIR did not happen it can still be remedied! Please respond to this letter ASAP as time is padding quickly. Sincerly Merrylou Nelson 661-942-5085 I.8-2

Responses to Comment Letter I.8
Merrylou Nelson
July 5, 2017

Response to Comment I.8-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. This comment is noted for the record and will be provided to the Regional Planning Commission and Board of Supervisors for consideration. The public will have opportunities for public comment at duly noticed public hearings before the Regional Planning Commission and Board of Supervisors. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

Response to Comment I.8-2:

The County of Los Angeles (County) sent the Draft EIR Notice of Availability, which contains a link to the Draft EIR document for review, via overnight mail to the SCAQMD on May 17, 2017. The County subsequently received a comment letter from the SCAQMD on July 13, 2017.

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From: Rose Bryan <rmr27@me.com>
Sent: Friday, July 07, 2017 2:14 PM
To: Jodie Sackett
Subject: Deir Centennial project

Jodie
Dept. Regional Planning

Dear Sir,
Thank you for presentation on the Centennial Project. I was disappointed with the lack of information in your presentation, And the blank CD you gave us that night,told us you did not want this community to respond to your DEIR. GVMWD was also left out until I contacted Mr.Springer a week Before your meeting and you than sent them the the Information. I.9-1
GVMWD is the led agency in your document! The GVMWD has A New Board who will have to be informed about our part in your Project.
The community needs more time to respond! I.9-2

Respectfully,
Rose Bryan

Responses to Comment Letter I.9
Rose Bryan
July 7, 2017

Response to Comment I.9-1:

Thank you for your comment and participation in this public process. Upon request, at the June 29, 2017 Hearing Examiner meeting, the Lead Agency distributed several CDs, which contained PDF files of the Draft EIR, to meeting attendees. Prior to the June 29 meeting, the Lead Agency also uploaded the Draft EIR to its public website and, after the meeting, upon request, further arranged the online material to be more accessible by breaking the Draft EIR into its individual sections for faster downloading and reviewing.

The Golden Valley Municipal Water District (GVMWD) has subsequently been added to the Project's distribution mailing list for future notifications. As mentioned in your comment, GVMWD has been in receipt of the Draft EIR since the Hearing Examiner meeting on June 29, 2017. The County of Los Angeles extended the office review period by 30 days to end on August 16, 2017, giving GVMWD 49 days to review and comment on the Draft EIR. Additionally, since the Hearing Examiner meeting, the Project Applicant has had multiple communications with the GVMWD Engineer regarding the proposed Project and the Draft EIR, and has offered to make a presentation to the new GVMWD Board Members about the proposed Project. Therefore, the GVMWD had adequate time to review and comment on the Draft EIR pursuant to the requirements of the California Environmental Quality Act (CEQA) Statute Section 21091.

Response to Comment I.9-2:

The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days.

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From: Virginia Stout <briaspirit@hotmail.com>
Sent: Friday, July 07, 2017 5:53 PM
To: Jodie Sackett; Merrylou Nelson
Subject: Centennial
Attachments: Centennila DEIR AATC Request for Extension 1.docx

Dear Mr. Sackett:

Please review the enclosed request . Several other Town Councils also agree. Thank you for your prompt attention.

Virginia Stout
Antelope Acres Town Council, President

Subject: Centennial DEIR Review July 6, 2017

To Mr. Jodi Sackett:

This is to inform you that on Wednesday, July 5, 2017 the Antelope Acres Town Council considered the issue of the Centennial DEIR.

Due to the importance of the project and its impact on our community, we have determined that there needs to be additional public outreach on the part of the L. A. County Planning Dept.

Additionally, the DEIR is a massive document and the amount of information to review and comment on is requires a considerable effort.

We have learned and confirmed that the South Coast Air Quality District (responsible agency) did not receive distribution of the DEIR and therefore have not had an opportunity to review and comment on the air quality aspects of the document.

We are formally requesting an extension for an additional thirty days beyond the current deadline of July 17, 2017.

Please respond to this request as soon as is possible. My contact information is Virginia Stout, briaspirit@hotmail.com, 551-609-9993. Thank you for your consideration.

I.10-1

Virginia Stout, President
Antelope Acres Town Council

Response to Comment Letter I.10
Antelope Acres Town Council
July 7, 2017

Response to Comment I.10-1:

Extensive community outreach has been conducted for the Centennial Project. In addition to meetings held with agencies and municipalities, the Project Applicant conducted 12 community outreach meetings in the Antelope Valley between 2015 and 2017. The Project Applicant presented on the proposed Project at the Fairmont Town Council, Oso Town Council, Antelope Acres Town Council, Three Points Town Council, Association of Rural Town Councils, Lakes Town Council, Farm Bureau, and Greater Antelope Valley Association of Realtors.

The County of Los Angeles (County) conducted a public Scoping Meeting to solicit suggestions from the public as to the content of the Draft EIR. The meeting was held at the Gorman Elementary School (49847 Gorman School Rd), on Wednesday, October 21, 2015 from 6:30 PM to 8:30 PM. Additionally, a public hearing on the Draft EIR was held before the Los Angeles County Department of Regional Planning Hearing Examiner on June 29, 2017, starting at 6:00 PM at Gorman Elementary School. The County has satisfied all requirements for public notifications and meeting.

The South Coast Air Quality Management District (SCAQMD) was provided the Notice of Availability of the Draft EIR and is on the Project's distribution mailing list. Confirmation of receipt by the SCAQMD has been received and a comment letter was received from the District on July 13, 2017.

Thank you for your comment and for your participation in this public process. The County extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days.

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From: Dean Canfield <dnacanfield@verizon.net>
Sent: Saturday, July 08, 2017 3:37 PM
To: Jodie Sackett
Subject: Centineal EIR

Please extend the review period for at least 30 days. I.11-1
Thank you,

Dean Canfield
dnacanfield@ieee.org

Response to Comment Letter I.11
Dean Canfield
July 8, 2017

Response to Comment I.11-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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From: King, Katherine <king@humnet.ucla.edu>
Sent: Saturday, July 08, 2017 6:16 PM
To: Jodie Sackett
Cc: Terry _ Cliff Kelling; Rose Bryan (rmr27@me.com); leslie bricker (bricker21 @frazmtn.com); Edie & Lynn Stafford <stafford@frazmtn.com> (stafford@frazmtn.com); Eric Anderson (eric.roy.anderson@gmail.com); William Hopper (IMAB6CF@gmail.com); 'Mar Preston'; 'thomas@hungerhurst.com'; 'Victoria Hungerford'
Subject: Request extension for Centennial DEIR comments

Dear Mr Sackett,

It Is essential that the community most affected by the proposed Centennial project be given 30 more days to comment.

The body of the DEIR is over 2000 pages, and Appendix 5.18-A (water) is itself over 1500 pages. How can we be expected to comprehend the monumental effect of this project in the short time we have been given?

In addition, the hearing you held on June 29 was not noticed to our community in the Frazier Park area. Some of us heard that there would be some sort of meeting for Tejon Ranchcorp to explain its project, but no one knew it was a hearing put on by the lead agency.

Folks in Neenach found out about it by accident, too. Apparently, the only notification was signs with print too tiny to read posted alongside the highway.

Members of the Golden Valley Municipal Water District in Gorman, which prepared the WSA in 2011, were not notified.

I write on behalf of myself and on behalf of my group, the Tri-County Watchdogs of the Frazier Park area, whose members come from Los Angeles County as well as Kern County. We will be submitting comments, but I feel impelled to write now to request an extension. Fairness demands it.

I-12-1

I look forward to hearing from you.

Katherine King,
Frazier Park and Los Angeles
Secretary, Tri-County Watchdogs

Response to Comment Letter I.12
Tri-County Watchdogs
July 8, 2017

Response to Comment I.12-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days.

The Notice of Availability of the Draft EIR (NOA) and a hardcopy of the Draft EIR were made available for public review at the Kern County Library- Frazier Park Branch. The NOA was mailed to the following entities located in Frazier Park: U.S. Forest Service District Ranger; Kern County Sheriff's Office; Lake of the Woods Mutual Water Company; Lake of the Woods Property Owners; Mountain Communities Health Start; Frazier Park Public Utility District; Humane Society; VFW Post 9791; Mountain Communities Chamber of Commerce; Pine Mountain Town Hall; Ridge Route Communities Museum and Historical Society; Mountain Communities Town Council; Pine Mountain Club Property Owners; Mountain Communities Chamber of Commerce; and 19 individuals that had requested to be notified in writing about the Centennial Project. Adequate notification was provided to the communities of Frazier Park. Members of the community of Neenach that requested to be notified in writing were also provided an NOA.

Pursuant to the requirements of CEQA Section 15087(a)(2), notice was posted on the Project site about the availability of the Draft EIR for public review.

The Golden Valley Municipal Water District (GVMWD) has been added to the Project's distribution mailing list and has been contacted and provided the Draft EIR with adequate time for review and comment pursuant to California Environmental Quality Act (CEQA) Statute Section 21091. Additionally, the GVMWD has been working on the Project, including approval by the GVMWD Board of Directors of the Project's Water Supply Assessment, which was included as Appendix 5.18-A of the Draft EIR.

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From: Mar Preston <marpreston@frazmtn.com>
Sent: Monday, July 10, 2017 12:29 PM
To: Jodie Sackett; Samuel Dea
Subject: Centennial DEIR

Along with others, I am requesting a 30-day extension of the comment period. I struggled with downloading sections while those who prepared the lengthy and dense document had the advantage of being paid 40 hours a week on for 17 years to put 2000 pages together.

My computer froze. I am a citizen who will be greatly affected by this development and I can't even read what is planned.

Please offer a 30-day extension of the comment period to August 17th so that we can at least read the document.

I.13-1

Thank you.

Sincerely

Mar Preston
1408 Banff Dr, #6751
Pine Mountain Club, Ca 93222

Response to Comment Letter I.13
Mar Preston
July 10, 2017

Response to Comment I.13-1:

Thank you for your comment and for your participation in this public process. The County of Los Angeles extended the official review period by 30 days to end on August 16, 2017, making the Draft EIR response period a total of 90 days. Additionally, after the June 29 Hearing Examiner meeting, the Lead Agency arranged the online material to be more accessible by breaking the Draft EIR into its individual sections for faster downloading and reviewing. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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From: Rose Bryan <rmr27@me.com>
Sent: Thursday, July 13, 2017 6:38 PM
To: Jodie Sackett
Subject: Centennial DEIR extension

Dear Mr. Sachet.

Thank you for the extension of 30 day
It was greatly appreciated by all our group. I.14-1

TCW member
Rose Bryan

Response to Comment Letter I.14
Rose Bryan
July 13, 2017

Response to Comment I.14-1:

Thank you for your comment and for your participation in this public process. The comment is noted. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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From: Virginia Stout <briaspirit@hotmail.com>
Sent: Tuesday, July 18, 2017 2:10 PM
To: Jodie Sackett
Subject: Centennial

Thank you for the extension for comment on the Centennial EIR. These documents take a long time to read and collaborate on with community members, who do not have the time that those who create the documents have. Thank you for making it a little easier for residents to be a part of the planning for the land they so deeply care about. I.15-1

Ginger Stout
Antelope Acres Town Council

Response to Comment Letter I.15
Antelope Acres Town Council
July 18, 2017

Response to Comment I.15-1:

Thank you for your comment and for your participation in this public process. The comment is noted. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

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J. Public Hearing Transcript and Responses

CENTENNIAL

at TEJON RANCH

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PUBLIC HEARING EXAMINER MEETING IN RE)
)
THE CENTENNIAL SPECIFIC PLAN PROJECT)
)
_____)

THURSDAY, JUNE 29, 2017
GORMAN, CALIFORNIA
6:15 P.M.

Reported by: Timothy Scott, CSR No. 8517

Public Hearing Examiner meeting in re the Centennial Specific Plan Project, at Gorman Elementary School, 49847 Gorman School Road, Gorman, California, on Thursday, June 29, 2017, at 6:15 P.M., before Timothy Scott, a Certified Shorthand Reporter for the State of California, holding Certificate No. 8517, pursuant to Notice.

APPEARANCES:

HEARING EXAMINER:
MS. GINA M. NATOLI

STAFF:
MR. JODIE SACKETT
MR. SAM DEA
MS. ROSIE O. RUIZ

APPLICANT:
MS. KRISTIN STARBIRD

COMMENTS BY:
MR. JERRY GLEASON
MR. MATTHEW MISENHIMER
MS. ROSE BRYAN
MS. PATRIC HEDLUND
MR. ANDRE HOLLINGS
MR. DALE KING
MS. TERRY KELLING

GORMAN, CALIFORNIA
THURSDAY, JUNE 29, 2017
6:00 P.M.

HEARING OFFICER NATOLI: This Thursday, June 29th, 2017, Hearing Examiner meeting is called to order.

The county would like to start our public hearing with the Pledge of Allegiance. So at this time I would like to ask you to please rise, if you are able, and join me in the pledge.

(Pledge of Allegiance.)

HEARING OFFICER NATOLI: Thank you.

Good evening. I am Regional Planning staff member Gina Natoli. I will be the hearing examiner on all agenda items tonight.

I would like to go through some administrative items first.

Please turn off or silence all electronic communication devices. If you would like to follow along with the proceedings tonight, agendas are available on the table where you first came into the building.

It's possible that there were materials

submitted for tonight's items after the release of documents. If there were additional items available, they can be reviewed at the table in the lobby.

There are established time limits for testimony on the hearing examiner agenda items. For the public hearing, applicants will have up to fifteen minutes and all others will have three minutes apiece, and there will be no ceding of time.

Anyone wishing to speak tonight on any agenda item, that includes the public comment period, needs to fill out a speaker card. You can always fill out a speaker card, and you are not obligated to speak if you change your mind, or if something comes up during the presentations by either staff or the applicant tonight and something pops into your head, if you do come up and speak and haven't yet filled out a speaker card, I would just ask that afterwards you obtain a speaker card so we can keep track of that later.

It's possible that questions may come up during testimony that prompt questions that I'll call the applicant back up or staff back up after the speakers have had their chance to give the testimony, and there may be time for rebuttal.

Per the county code a hearing examiner makes no decisions; so the Centennial Project Specific Plan will

J.1-1

not be decided tonight.
The hearing examiner administers the meeting, takes testimony, and then reports on that testimony to the decision-maker. And in this instance the decision-maker will be the Regional Planning Commission. Per the public hearing notice, this public hearing can take testimony on the project's Draft EIR for the Centennial Project's Specific Plan, is just part of the process.
The hearing on the specific plan itself and the environmental document will be scheduled before the Regional Planning Commission at a future date.
If you did not receive a notice for this meeting and would like to be on the public notice list for the Regional Planning Commission public hearing, please see Mr. Sackett after the meeting and make sure he gets your address so you can receive that notice.
Also, per the public hearing notice, testimony will be taken tonight until last person has spoken or until 9:00 p.m., whichever comes first.
If you intend to speak tonight on any item on the agenda that includes the public comment period, I'm going to ask that you stand at this time to be sworn in by staff, by Mr. Dea.
Again, if you decide afterwards that -- or

during the meeting -- that you don't want to speak, that's fine. Being sworn in does not obligato you to speak.
So again, at this time I would ask that anyone who's going to speak on any agenda item please stand to be sworn in.
MR. SAM DEA: Please stand if you're able.
Do each of you swear or affirm under the penalty of perjury that the testimony you may give in the matters now pending before the hearing examiner shall be the truth, the whole truth and nothing but the truth? If so, please say "I do."
(I dos.)
MR. SAM DEA: Please be seated.
HEARING OFFICER NATOLI: Thank you very much.
Moving on to part 2 of the public hearing, Item 2, Project Number 02-232-(5). The applicant is Tejon Ranch.
Mr. Sackett, please proceed.
MR. JODIE SACKETT: Yes, thank you.
My name is Jodie Sackett. I'm a Senior Regional Planning assistant with the Los Angeles County Department of Regional Planning.
Item Number 2 on tonight's agenda is the Centennial Specific Plan Project, Specific Plan Number

02-232, along with the following entitlements: General Plan Amendment Number 02-232, Zone Change Number 02-232, Vesting Tentative Parcel Map Number 060022, Conditional Use Permit Number 02-232, and Development Agreement Number RPPL2016003940.
The location of the project is the upper northwest corner of Los Angeles County, south of Kern County, near the unincorporated community of Gorman, approximately 35 miles north of Santa Clarita, one mile east, approximately, of the I-5 freeway, and abutting and mainly north of Highway SR-138.
Project Description: The project encompasses a total of 12,323 acres, which is approximately 19.3 square miles, and the project proposes to develop up to 1,900 -- excuse me -- 19,333 dwelling units sited in nine different villages, and the village map is what's shown on the screen here.
4,098 single family attached, 2,643 single family attached, and 2,592 multi-family units. An estimated build-out population of 57,150 people.
There's approximately 7,363,818 square feet of business park uses, which includes office, research and development, and warehousing or light manufacturing uses on approximately 597 gross acres.
1,034,550 square feet of commercial uses on

approximately 102 acres.
Institutional civic land uses such as schools for higher education, medical facilities, library, other civic uses.
Approximately 1,000 -- excuse me -- 1,568,106 square feet on approximately 110 acres. Four fire stations, a sheriff station, two waste water reclamation facilities for the tertiary treatment of all waste water. 5,624 acres on-site open space with an additional 209 acres of active park and recreation space. And the project will have approximately 100 million cubic yards of on-site grading.
The project entitlements include the specific plan for the new master planned community. The general plan amendment to amend the Antelope Valley Area Plan Land Use Designations. The zone change to change the zoning from open space A-1-2, RPD, and other zones to Specific Plan Zone.
There's also a Vesting Tentative Parcel Map to create 21 large-lot parcels for lease and financing purposes, and a Conditional Use Permit to authorize the grading for the project and for infrastructure related to circulation sewer, water, flood control, electrical, gas, composting, solid waste, water retention and treatment, road realignment, bridge construction and

J.1-1

J.1-2

J.1-2 cont.

highway intersection improvements.
The existing land uses include to the north open space and conservation, water and rural land use. To the south you have rural land use 20 acres or larger, again, with water and open space conservation.
To the east we have rural land. And to the west we have BLM land, again, rural land and open space.
Existing zoning to the north we have open space, heavy agricultural with two-acre minimum lot sizes. To the south we have light agricultural, two-acre minimum lot sizes along with heavy agricultural and spaces zoned for open space. To the east we have zoned open space, again, heavy agricultural and light agricultural. And to the west we have open space and heavy agricultural.
Previous Cases and Zoning History: The project site has been primarily used for livestock raising for 150 years. In addition to cattle grazing, the Tejon Ranch Company owns and cultivates approximately 1,000 acres of agricultural land in the eastern portion of the project site.
Project entitlements were originally filed in 2002.
In 2004 a Draft EIR Scoping Meeting was held. The project was updated and revised several times until

J.1-2 cont.

the most recent scoping meeting was held in 2015, and an updated Draft Environmental Impact Report was subsequently prepared.
The areas analyzed in the Draft EIR: The current environmental review is for A Draft Environmental Impact Report associated with the project and all of its required entitlements.
The project's initial study determined that all areas of analysis should be reviewed. These include geotechnical; hydrology and flood; hazards and fire safety; water quality; land resources, which include under-land resources; agricultural; forestry; mineral resources; cultural and tribal resources; biological resources; land use entitlements and planning; population, housing and employment; traffic access and circulation; air resources; noise; visual resources; parks and recreation; education; fire and law enforcement services; other public services such as library, solid waste and other public facilities; water resources; wastewater collection; dry utilities such as electrical, fossil fuels, natural gas and petroleum; telephone and cable service; climate change; growth-inducing impacts; and cumulative impacts.
As identified in the Draft Environmental Impact Report, the project will have several areas that have

less than significant impacts, and these include: Geotechnical; hydrology; hazards and fire safety; water quality, cultural and tribal resources; biological resources; land use; entitlements and planning; traffic; access and circulation; parks and recreation; education; fire and law enforcement services; water resources; waste water collection; dry utilities; and growth inducing impacts.
Several areas of analysis in the Draft Environmental Impact Report concluded that the project will result in significant and unavoidable impacts to the environment. Following is a summary of impacts associated with the project determined in the Environmental Impact Report to be significant and unavoidable after implementation of the project's design features and mitigation measures. These areas are: Agricultural and forest resources; population housing and employment; air resources; noise; visual resources; solid waste management and climate change.
The project will also have cumulatively significant and unavoidable impacts. The following environmental factors would result in cumulatively significant and unavoidable impacts to the environment. Those include: Land resources; biological resources; population housing and employment; traffic access and

J.1-2 cont.

circulation; air resources; noise; visual resources; solid waste; water resources; climate change.
Planning Process and Next Steps: The Draft Environmental Impact Report public comments will be received until July 17, 2017. The next step will be to prepare a final Environmental Impact Report with response to all public comments.
After that will be -- the project will be presented at the county, L. A. County Regional Planning Commission, and they will make a decision to either approve or deny the Environmental Impact Report along with the associated project entitlements.
And the project must eventually go to the Los Angeles County Board of Supervisors, which will, based upon the recommendation or the Regional Planning Commission and the public testimony received, either approve or deny the Environmental Impact Report along with the project's entitlements.
And this concludes staff's presentation. Thank you.
HEARING OFFICER NATOLI: Thank you, Mr. Sackett.
At this time I'm going to open the public hearing and ask the applicant to come forward and make their presentation.

J.1-3

J.1-3 cont.

Thank you for coming and taking a seat. Please state your name for the record before you begin.

MS. KRISTIN STARBIRD: Sure. I'm Kristen Starbird. I'm with Psomas. I'm a senior project manager and I worked on the CEQA documentation for the proposed Centennial project. And we also have Greg Margaris and Nathan Keith that are here and available to answer any questions if anyone has any questions about Tejon Ranch or the project itself.

So Tejon Ranch is the largest privately owned land holding in California with 270,000 total acres of land in that shroud between Los Angeles and the Kern County border. It's been a working ranch for over 150 years with farming, cattle grazing, hunting, et cetera. And Tejon is also known for being a steward of the land resources and for conservation within their property.

In 2008, Tejon entered into a conservation land use agreement that would preserve approximately 90 percent of their acreage, 240,000 acres as undeveloped. That includes approximately 145,000 that's dedicated conservation easement land, 33,000 acres preserved within development areas, and environmental groups have acquired an additional 62,000 acres of land.

Tejon Ranch conservancy board manages this land and coordinates the five major environmental groups for

the protection and enhancement of native ecosystems on the property.

Because Tejon Ranch has preserved 240,000 acres, there's 30,000 approximately remaining acres for development. Of course, in the right location, which is close to freeways. Tejon Ranch spans 28 miles of frontage along the Interstate 5 corridor, and development along the transportation corridor will help establish jobs and housing for working Californians in Kern County, Los Angeles County and beyond.

Tejon is already moving forward with four other projects in Kern County, including Tejon Commerce Center, Outlets at Tejon, Grapevine, and the Tejon Mountain Village projects.

Which brings us to the Centennial Project. Centennial is the final development component of the Tejon Ranch property build-out. It includes 19 square miles of land bisected by State Route 138 and is entirely located within Los Angeles County.

Centennial is intended to be a self-sustained community due to the internal balance of residential and employment land uses.

This graphic depicts the Antelope Valley Area Plan land use designations for the site and surrounding areas.

In 2014 the AVA was approved by the L. A. County Board of Supervisors. And the AVA directs that the majority of the unincorporated Antelope Valley's future growth be diverted into rural town areas, rural town centers and economic opportunity areas.

The AVA approval established the west economic opportunity area, or EOA, which contains the Centennial Project site, and also requires the approval of specific plan for the orderly development within the EOA.

Here's another depiction of the land use designation with an overlay also for the significant ecological area and hatching, that's SEA Number 17, San Andreas.

The project site contains 3,861 acres of SEA land that would be conserved on preserved and not affected by the site's development.

So in summary, Centennial's Land Use Plan implements the requirements of the AVAP by including a balance of land uses and public facilities and is consistent with the goals of the West EOA and the future rural town identification site.

Centennial preserves the majority of the site's most biologically sensitive lands including pristine oak woodlands and drainages in Oso Canyon.

Overall the site contains 12,323 acres, and of

this almost half is preserved as open space.

The project includes residential areas. Not to be repetitive, but 19,333 residential units that range from low density and very low density to high density residential organized into nine villages.

Again, the villages are phased over time over a 20-year build-out time frame.

The primary village, Village 3, is kind of the center of downtown of the Centennial Project site and is near the entrance, the primary entrance to the property.

The project would include approximately 10 million square feet of nonresidential development and create approximately 23,600 permanent jobs. That square footage development includes 7.4 million square feet of business park, research and development, light industrial manufacturing, office, trade schools, hotels, et cetera, 1.4 million square feet of institutional and civic uses, including higher education, post secondary school, hospitals, medical centers, libraries, et cetera, and approximately 90,000 square feet of commercial development.

As mentioned earlier, the site includes 5,624 acres of open space. Of that we've got 163 gross acres of park overlay that provides a variety of recreational amenities, including public neighborhood

J.1-3 cont.

parks, community parks and community regional parks. There is an additional 46 acres of recreation centers and county multi-use trails for pedestrians and bicyclists that ultimately connect to the Pacific Crest.

As a broad overview of the project objectives, the primary goals are to implement the development anticipated in the Antelope Valley Area Plan; to maximize the efficient use of regional infrastructure; to provide a balance of employment, residential and institutional recreational land uses; and create public services and infrastructure funded by the project.

The project benefits, in summary, include approximately 23,000 permanent jobs and 25,000 construction jobs, 31 million annual public revenue for L. A. County.

Benefits for the surrounding community are made through the Centennial Project, as well, including the development of public parks, pocket parks, private parks, 95 miles of public trails, and public infrastructure and public services; up to four fire stations on the site, one sheriff's station, one library located in the town center Village 3, land available for medical facilities, all of these services in surrounding communities, too.

The project has approved school agreements with

J.1-3 cont.

the Gorman Joint School District and Antelope Valley Union High School District, and will develop seven new schools.

So in summary, Centennial is a master planned community that will be phased over a 20-year build-out time frame. It implements the requirements of the AVAP by providing a balance of land uses that fulfill the economic objectives of the West EOA and comply with the land use goals and policies set forth in the Antelope Valley Area Plan.

Thank you very much.

HEARING OFFICER NATOLI: Thank you. I understand you have not yet filled out a speaker card, is that correct?

MS. KRISTIN STARBIRD: I'll fill it out right now.

HEARING OFFICER NATOLI: Thank you. Thank you very much.

J.1-4

I'm going to ask Mr. Dea to call speakers now, those of you that signed up.

What I would like you to do, the first two names that are called, come on up and take a seat at the table. The other folks that he calls, maybe call five at a time.

MR. SAM DEA: Four or five.

HEARING OFFICER NATOLI: Four or five at a time.

Numbers 3, 4 and 5, if you could come up to the front row, we have seats reserved for those who are speaking. Come on up and take a seat.

Those of you at the table, you'll state your name for the record. Just between the two of you, you can decide who's going to start first.

When you finish your testimony, please, I would ask that you vacate the seat, and the next person who was called, if you could please come up and take that seat so we can keep things moving along.

There's a timer here on the table. You'll have three minutes to speak. The green light will come on after you stated your name. When you have 30 seconds left, that yellow light will come on. So you want to make sure you wrap up your testimony, get in your crucial statements. And the red light means it's time to stop.

I also do want to say that there is a transcript being made of tonight's hearing. In addition, there is a video/audio recording that's being made.

The transcript is normally available about ten working days after the meeting. And the video is

J.1-4 cont.

normally up on our website, planning.LACounty.gov, within about three working days. So with this being Thursday, Regional Planning is closed on Fridays, and the 4th of July holiday coming up, it should be up by the end of next week.

So at this time, Mr. Dea, if you could call our first speakers.

MR. SAM DEA: Thank you. First four speakers: Jerry Gleason, Patrick Hedlund, Matthew Misenhimer, Rose Bryan.

HEARING OFFICER NATOLI: Mr. Gleason, if you would like to start, please, go ahead.

MR. JERRY GLEASON: Yes, my name is Jerry Gleason and I live here in the Neenach/Three Points area.

J.1-5

And as a commuter I would like to voice my disapproval for this project based on the traffic burden that it's going to cause.

I'm aware of the project to improve the 138, which I think would handle most of the east/west traffic just fine, but I commute down Interstate 5, which as we know, is the only artery from north to south that runs through this area. The next closest one would be Interstate 14, or State Route 14, which is about 50 miles to the east, and Highway 101, which is about

J.1-6

100 miles to the west.

As you may have noticed today, there was a truck accident on the 5 causing quite a bit of traffic. That is not an isolated incident; that happens frequently.

We also have weather-related closures to Interstate 5. We have brushfires and we have a large amount of truck traffic, like I stated. So one overturned truck literally brings the freeway to a halt. I personally have been stuck in traffic for as much as four hours at a time because there's no relief; you can't get off the freeway.

There's -- in some places there's six, seven miles between exits and you can't get off of freeway; you're stuck there. It doesn't matter if it's 110 degrees out or 20 degrees out; you're stuck there in your car for that amount of time.

So unless the State of California, the Department of Transportation, has some plan in the works to make a relief route to get through this area, I think it's insane to build a housing project and dump a couple more thousand vehicles on that freeway.

As a homeowner in the area, I see people pulling over on the side of the road taking pictures of the beautiful area. It's scenic. I feel like I'm

driving through Colorado or New Mexico when I come through this area.

And I think the day that this construction begins, if it's approved, all that is going to be gone. And you can kiss all this beauty good-bye.

So that's my emotional side. As a homeowner I object to it. But really, the traffic issue I think needs to be addressed. There has to be a permanent solution to that. And unless they come up with something to address that, I say this project should not go forward.

Thank you.

HEARING OFFICER NATOLI: Thank you, Mr. Gleason.

Hi.

MS. ROSE BRYAN: Hello. I'm Rose Bryan. And I'm a resident here in Gorman. And I've been here for almost forty years. And through the forty years I have been in so many of these developments that have come and gone for one of the main reasons, and that's water.

Water issues have been a real problem here in Gorman, not only for us residents, but also any project that's ever, ever come through here, and believe me, I have been at the forefront of every single one of them. One of the main things is the area that -- or the water,

unless you bring it in from Kern, unless you bring it in from an outside source, is all apparently allocated. As many of the other EIRs I have read from the Antelope Valley, from state water project, from the wells, the aquifer, every single one of them, and I know, I'm on one of them myself, the drought has really collapsed a lot of our wells in this community all up and down the hill, in Gorman, and where ever else you have a well, the Antelope Valley.

And so I'm asking if they put in nine wells in the Antelope Valley down to a thousand feet of a pipe of 14 inches, how are you going to mitigate all the other private wells and agriculture and all the other uses for water in the Antelope Valley, let alone in Gorman, to allow such a huge development? I just don't understand it. To me it's just almost an impossibility.

I mean, the developments have come and gone for that particular reason. And I'm not just -- you know, I've been living here long enough to go through all of these.

So consequently, even this year, State Bill 88, which is the state bill that Mr. Brown put in because of the drought to mitigate all the basins in California and to be able to recognize the overdraft that all these basins have incurred through the years, and especially

through the drought.

Now, if you pull out X amount of water through any of these basins or aquifers, who's going to manage that? I'm concerned about that because no one thinks about managing the water sources and the amount of water that is pumped out of those aquifers. Because if there is no recharge, and we had a good rain this year, and all the water in sag ponds have now dried out. This is July. It shouldn't have dried out until August, September, if we have water.

Now we have to have substantial amounts of years of water for it to replicate a lot of the water that we have taken out.

HEARING OFFICER NATOLI: Miss Bryan, I'm going to ask you to wrap up.

THE WITNESS: Oh, I'm sorry. I'm going on and on.

Anyway, the wells that they are putting in, I'm really concerned about that. And also the biological resources, they haven't even enough corridors for the animals to traverse from one land to another. Therefore, it is very difficult for me to understand how you could possibly put in this huge development without more regulations as to the biological resources.

And I thank you very much

J.1-6 cont.

J.1-7

J.1-8

J.1-9

J.1-9 cont.

J.1-10

J.1-11

J.1-12

HEARING OFFICER NATOLI: Thank you, Miss Bryan. Please, sir.

MR. MATTHEW MISENHIMER: Hi. My name is Matt Misenhimer. And I moved --

HEARING OFFICER NATOLI: Could I ask you, Matt, for the benefit of our court reporter, to spell your last name.

MR. MATTHEW MISENHIMER: Yeah, it's M-I-S-E-N-H-I-M-E-R.

HEARING OFFICER NATOLI: Thank you.

MR. MATTHEW MISENHIMER: So I'm mainly concerned about the effects of urban sprawl in the area due to the communities that are already up here, as well as the prices up here, and just I kind of see any developments as an eyesore.

I moved up here from Ventura last year. One of the main reasons is Ventura has undergone changes in the population that made it not a very good place, in my opinion. It went from being a great place when I was younger to being now overpopulated, and the culture that existed there before no longer exists. It's been drowned out by people imported from other areas.

And I believe the same thing will happen with this as -- the 50 to 70,000 people that may move into this new development, that's going to greatly outnumber

the populations that are already up here and the cultures that already exist.

And one main reason that a lot of people like to live up here is to get away from all the headaches and the overpopulation in L. A. and Ventura and, you know, Bakersfield.

So I would definitely -- I would hate to see the development happen, honestly, because I just -- I know it will bring great things, more jobs. People do need jobs in the area. A hospital, too. The closest hospital is pretty far away.

But at the same time I think you're going to -- if the development goes forward, you will see all the areas up here, Frazier Park, Neenach, Lake of the Woods, all of them are going to be severely impacted. Maybe in a positive way, maybe negative. It's all going to be chaotic for a while. People will not know what to expect.

Are property values going to drop? Are they going to rise? Will they be able to find jobs in that community, or is it just going to be, you know, wishful thinking?

Anyway, I just -- and since the area has so many unique attributes with regard to wildlife, like we have things that exist up in this area that don't exist

anywhere else, I know that that's going to be examined by the council and probably continued to be examined, but that's a serious concern.

And I think my time is up.

HEARING OFFICER NATOLI: Thank you, Mr. Misenhimer.

MR. SAM DEA: Okay. Last call for Patrick Hedlund.

And the next three speakers: Andre Hollings Terry Kelling, and Dale King.

HEARING OFFICER NATOLI: Please go ahead.

MISS PATRIC HEDLUND: My name is Patric Hedlund. And I'm speaking only on the issue of notification regarding this hearing.

As Mr. Misenhimer indicated, he was thinking about people that live here now and the people that will be most impacted by the changes.

He indicated Frazier Park, Lake of the Woods, that is Pine Mountain, there's Lebec, there's Gorman, and there's Neenach and there's Fairmont.

So all of those areas are within the coverage area of the Tri-County newspaper called the Mountain Enterprise.

And the reason I bring it up is because we are the adjudicated legal publisher for the region, and

we're also the only newspaper with its feet on the ground typically reporting in these areas.

There was no notification in our newspaper. And my concern is when we've had meetings in this same venue over the last several years, with Mr. Dea's assistance, we usually had a very full house. We don't have a full house today. And one of the reasons is I'm concerned, even though as Mr. Dea mentioned, we had an updated website by the planning staff, which I appreciate very much. But people -- that's kind of having to search for it. It's not coming to their venue and into the news environment, which CEQA says is still required.

So I just wanted to point that out. And it makes me a bit concerned about the possibility of whether the community will be asking for an extension of the review period for the DEIR.

So I wanted to bring that up to ask you to consider that because in the past when I've covered table ranches and other developers' projects and proposals, we do tend to have a very engaged community. We have groups that get together and gets committees put together and they go through the EIRs carefully.

So I just want to respect that and I know you folks do, too, and I know that CEQA, of course, cares

J.1-13

J.1-14

J.1-14 cont.

J.1-15

J.1-15 cont.

about that as well.

So I thank you very much for your hearing.

HEARING OFFICER NATOLI: Thank you. Please go ahead, sir.

MR. ANDRE HOLLINGS: Good evening. My name is Andre Hollings, and I am here to speak in favor of the Centennial Project.

Centennial is the county's implementation of the Antelope Valley Area Plan. Centennial supports the Antelope Valley Area Plan's goal of reducing vehicle use.

The community will offer alternatives to automobile use, such as public transit, a bicycle network and a pedestrian system, which will minimize traffic pollution and green house gases.

J.1-16

Centennial will provide an integrated network of roadways, walking and biking trails to reduce the use of automobiles and facilitate safe and efficient travel. Sidewalks, greenway trails and community trails will link to residential, schools, shopping and employment areas.

In support of the Antelope Valley Area Plan's prioritization for the preservation of open space resources there will be minimal development in areas of significant biological value.

As one of the three Economic Opportunity Areas established by the Antelope Valley Area Plan, Centennial is within the West Economic Opportunity Area.

The main goal for the Antelope Valley Area Plan is to provide a balanced plan, economic opportunity and conservation, and that is exactly what Centennial proves to be.

There is support for this project throughout the county. And we ask for your approval on this project. Thank you.

HEARING OFFICER NATOLI: Thank you, Mr. Hollings.

MR. DALE KING: My name is Dale King. For the last five or six years I have attended every meeting that Centennial has put on. I believe that the people who have stated negativity toward it probably have not attended any of these meetings, or very few, or they would know how well Centennial Project as far as water and water sharing is set up.

J.1-17

I don't want to sit here and tear down other people because I think it's great there is a turnout. There may not be a full house in here, but the parking lot is full. So I hope I don't get towed because there was no place to park.

Water takes six months to a year for one drop

to go 100 feet. So all our wells up here are suffering. But I did have the foresight to put in a reservoir on my five acres and I was able to catch thousands of gallons of water, and my well is better than it's ever been from just this last year. I know it will take several years for us all to recuperate.

The sad portion about it is it's just not the communities up here suffering from water, it's the entire city of L. A. and the whole county of L. A. But we just all need to work smarter and think smarter, and that is one thing I believe Centennial has done in regards to the conservation.

Each house will have drought-tolerant plants and a program, that irrigation, which is something I don't know any community in anyplace in the United States has.

Medical is a big issue with me due to my age. I have to go to Santa Clarita for my local physician. I would love to have one up here.

Banking is another issue up here; there's only one bank in this community. I have heard nothing but negativity, maybe it's a great bank, but unfortunately no credit union; that's where I bank.

I just want to wrap it up in saying that everything I know about Centennial is good, and I'm all

J.1-17 cont.

for the plan. There's going to be traffic no matter where we live. People will continue to populate. We just need to control the population. I think Centennial bent over backwards to make sure that this is going to happen.

I have toured the site, and the residential area will not even be visible from the I-5 or 138. I don't think it will create any type of eyesore whatsoever, and their plan is to keep Tejon Ranch in the same condition that it has been.

Thank you very much.

HEARING OFFICER NATOLI: Thank you, Mr. King.

MS. TERRY KELLING: Yes, my name is Terry Kelling, and I'm here to speak to the clean air, and we enjoy our clean air up here. One of the reasons that I live here rather than in Santa Clarita or Bakersfield.

J.1-18

And with the project going in, I've had several friends come down with valley fever when they were putting in some of these solar farms, and I'm really concerned that with Centennial going in, that will rise. It has risen horribly here in Kern County over the last year. And I know that you guys have put in the Draft EIR about notifying and having most windy days somebody who can shutdown the grading and so forth and letting people know that you guys are going to be grading.

J.1-19

J.1-19 cont.

I think that needs to be extended out to include up to PMC, into our mountains, because that wind carries. We need to notify people. The wind carries clear over to Ventura. And so we need to let people know that this stuff is going on and that there's a high risk of them contacting valley fever, and they need to be aware. And I think that's something that Tejon needs to let people know that they are going to be grading and moving all this earth, and that we need somehow to protect ourselves. And getting out the word, as they say they are trying to do, doesn't necessarily help. I mean, they got to inform much more than just the TV ad. Mega links or something, I don't know what the answer is. But they need to inform the mountain communities that they are going to be grading and we're at a high risk.

And I mean, I can't -- I don't know if the project will be good or bad. It's just going to be one. Thank you.

HEARING OFFICER NATOLI: Thank you, Miss Kelling.

MR. SAM DEA: We have one last speaker, and that's the representative, Nathan Keith, only if they are able to answer questions.

That concludes the last speaker for this item.

J.1-20

HEARING OFFICER NATOLI: I would like to ask you, Mr. Dea, do you have any comments or responses to the issues raised by those who testified?

MR. SAM DEA: No. Just wanted to add that these issues will be responded to in the response comments of the final EIR, and many of these issues have been anticipated in the Draft Environmental document, and it's been analyzed, and the impacts and the -- any feasible mitigation has been incorporated into the Draft EIR. But we're open to any comments based on information you presented either tonight and in the Draft EIR.

HEARING OFFICER NATOLI: Thank you.

And does the applicant have any comments, any responses, based on the testimony given tonight?

Seeing that you do not, let me go over the next steps that Mr. Sackett had in his slide.

Again, you've presented testimony on the Draft EIR. Your comments will be taken and responses to those comments will be drafted, written up and included in the final EIR that will go before the Regional Planning Commission along with the project, which is the Centennial Specific Plan.

The comment period for this Draft EIR is 60 days. It's more than the 45 that is -- 30 is required

by CEQA. 45 is often. And this is up to sixty.

The comment period for this Draft EIR closes on the 17th of July. That's about another two-and-a-half weeks from tonight.

So if you do have comments, something comes up that you think of after the meeting tonight, you can always contact Mr. Dea or Mr. Sackett to provide your comments.

With that, what I'm going to do now is close the public hearing for Item 2. And you know what's going to be happening next on that. And move on to Part 3, which is the public comment period.

Do we have anyone signed up for public comment period?

MR. SAM DEA: No one signed up.

HEARING OFFICER NATOLI: All right. With that, we move into Part 4, which is adjournment of the meeting. And this Hearing Examiner Meeting is adjourned.

Thank you very much for coming.

(PROCEEDINGS CONCLUDED AT 7:04 P.M.)

J.1-20 cont.

CERTIFICATE
OF
CERTIFIED SHORTHAND REPORTER

I, TIMOTHY SCOTT, CERTIFIED SHORTHAND REPORTER, CERTIFICATE NO 8517, DO HEREBY CERTIFY THAT SAID PROCEEDINGS WERE TAKEN BEFORE ME AT THE TIME AND PLACE THEREIN SET FORTH AND WERE TAKEN DOWN BY ME IN SHORTHAND AND THEREAFTER TRANSCRIBED, SAID TRANSCRIPT BEING A TRUE COPY OF MY SHORTHAND NOTES THEREOF

I FURTHER CERTIFY THAT I AM NEITHER COUNSEL FOR, NOR RELATED TO, ANY PARTY TO SAID PROCEEDINGS, NOR IN ANY WAY INTERESTED IN THE OUTCOME THEREOF

IN WITNESS WHEREOF, I HAVE HEREUNTO SUBSCRIBED MY NAME THIS DATE JULY 10, 2017

CERTIFICATE NUMBER 8517

Responses to Comment Letter J.1
Public Hearing Examiner Meeting in re
The Centennial Specific Plan Project
July 29, 2017

Regional Planning staff member Gina Natoli

Response to Comment J.1-1:

This is an introductory comment by the County Hearing Examiner. It is not a comment concerning the potential environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. This comment will be made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Senior Regional Planning Assistant Jodie Sackett

Response to Comment J.1-2:

This is an introductory comment by the County Senior Planning Assistant. It is not a comment concerning the potential environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. This comment will be made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Regional Planning staff member Gina Natoli; Kristin Starbird Senior Project Manager at Psomas

Response to Comment J.1-3:

This is an introductory comment by the Project EIR consultant. It is not a comment concerning the potential environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. This comment will be made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Regional Planning staff member Gina Natoli

Response to Comment J.1-4:

This is an introductory comment by the County Hearing Examiner. It is not a comment concerning the potential environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. This comment will be made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Jerry Gleason

Response to Comment J.5-5:

Thank you for your comment and for participating in this public process. This comment expresses an opinion about the Project. This comment does not concern specific potentially significant environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. This comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Response to Comment J.1-6:

The comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. The comment does not raise a specific concern regarding the content of the Draft EIR, and no further response is required.

The following information summarizes the analysis of potential Interstate-5 (I-5) traffic impacts in the Draft EIR, which are discussed in detail in Section 5.10, Traffic, Access, and Circulation, including the text and tables on pages 5.10-56 to 5.10-119. The analysis compares the applicable Level of Service (LOS) standards for I-5 freeway segments and onramps and off-ramps located north and south of the Project site using well-established analysis methodologies under existing conditions, existing conditions with the Project, and under future (cumulative) with Project conditions based on future I-5 traffic projections prepared by applicable transportation and transit planning agencies for Los Angeles County and Kern County. The Draft EIR determined that no significant impacts to freeway segments or interchange ramps would occur under existing plus Project conditions, and that the Project could contribute to an exceedance of capacity on the westbound State Route 138 (SR-138) to southbound I-5 ramp. The Draft EIR determined that, under cumulative plus Project conditions, the Project could contribute to impacts at six mainline segments along I-5 and to the interchange connector ramps from westbound SR-138 to southbound I-5 and from I-5 to eastbound SR-138. The Draft EIR found that all potentially affected I-5 segments and ramps under existing plus Project and cumulative plus Project conditions would operate within acceptable performance criteria with certain specific improvements (see Draft EIR page 5.10-80 for existing plus Project ramp improvements; Draft EIR page 5.10-103 for cumulative I-5 segment improvements; and Draft EIR page 5.10-119 for cumulative I-5 ramp improvements). Draft EIR mitigation measures, including MMs 10-2, 10-3, 10-4, 10-21, 10-23, 10-26, and 10-28 to 10-35 requires that the Project provide fair share funding for all these improvements and also implement on-site programs to reduce Project vehicle trips. The Draft EIR found that compliance with these mitigation measures and the fair share contributions towards the improvements described above would reduce potential Project impacts to I-5 freeway segments and ramps to less than significant levels.

Response to Comment J.1-7:

Thank you for your comment and for participating in this public process. This comment expresses an opinion about the Project. This comment does not concern specific potentially significant environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. This comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. For reference purposes, the Project's potential environmental effects related to visual resources were fully analyzed in Section 5.13, Visual Resources, of the Draft EIR, which discloses that the Project would cause a significant and unavoidable impact related to visual resources.

Response to Comment J.1-8:

Thank you for your comment and for participating in this public process. This comment expresses an opinion about the Project. This comment does not concern specific potentially significant environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. This comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project. Please see response to Comment J-6.

Rose Bryan

Response to Comment J.1-9:

The comment does not raise a specific concern regarding the content of the Draft EIR and no further response is required. The Project's water supplies are discussed in Section 5.18, Water Resources, of the Draft EIR and are separate from, and will not affect, the Gorman area water supplies referenced in this comment. The Draft EIR found that the Project's available water supplies would sustainably meet buildout potable and recycled water demands and would maintain an average annual reserve supply in the two Project water banking facilities of more than 79,000 acre-feet after buildout has been achieved and that Project water supply impacts would be less than significant with mitigation.

Response to Comment J.1-10:

The Project's water supplies are discussed in Section 5.18, Water Resources, of the Draft EIR and are separate from, and will not affect, the Gorman area water supplies referenced in this comment. All Project groundwater use will comply with the Antelope Valley Basin Adjudication Judgment and Physical Solution.[3241] The Adjudication Judgment and Physical Solution was approved by the Court to sustainably manage Antelope Valley groundwater resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution also takes account of and avoids potential long-term, cumulative impacts to the Antelope Valley Basin. Section 1.5 of the Adjudication Judgment and Physical Solution states that after the Phase 3 trial of the proceedings, the Court determined that the

[3241] DRP 2017, Appendix 5.18-D

safe yield of the Antelope Valley Basin is 110,000 acre-feet per year. Section 3.5.43 of the Adjudication Judgment and Physical Solution defines safe yield to mean the amount of annual extractions of water from the Basin over time equal to the amount of water needed to recharge the groundwater aquifer and maintain it in equilibrium, plus any temporary surplus. Section 3.4 of the Adjudication Judgment and Physical Solution states that the physical solution governs groundwater, imported water and Antelope Valley Basin storage space to ensure that the Antelope Valley Basin supports existing and future reasonable and beneficial uses. Exhibit 4 to the Adjudication Judgment and Physical Solution allocates overlying production rights in amounts consistent with the Basin's sustainable yield and provides that, after a seven-year rampdown period applicable to all basin groundwater users, the Tejon Ranch Company has an overlying production right of 1,634 acre feet per year, all of which will be provided to and utilized by the Project. The groundwater component of the Project's water supplies discussed in the Draft EIR is limited to the amount of the overlying production right of 1,634 acre feet per year allocated to Tejon Ranch Company in the adjudication. The fact that the Adjudication Judgment and Physical Solution, including the annual groundwater allocation to the Tejon Ranch Company, takes account of and avoids potential long-term and cumulative impacts to the Antelope Valley Basin is recognized in the 2014 California Sustainable Groundwater Management Act, which requires, for the first time in state history, that certain medium and high priority groundwater basins implement a plan to sustainably manage groundwater over time. Section 10720.8(b) of the Act specifically exempts the Antelope Valley from these requirements upon the approval of the Adjudication Judgment and Physical Solution. Section 10720.8 also exempts other adjudicated basins throughout the state. These exemptions demonstrate that an adjudication judgment, including the Antelope Valley Basin Adjudication Judgment and Physical Solution, accounts for and allocates water uses, avoids long term, cumulative groundwater impacts and ensures that cumulative groundwater use will be sustainable over time. Consequently, Project groundwater use in accordance with the Adjudication Judgment and Physical Solution will not conflict with groundwater use by other parties in the Antelope Valley over time.

Response to Comment J.1-11:

The Project's water supplies are discussed in Section 5.18, Water Resources, of the Draft EIR and are separate from, and will not affect, the sag ponds referenced in this comment. The comment reference to Senate Bill 88 appears to pertain to certain California legislation enacted in June 2015 that provides for, among other measures, the consolidation of smaller water providers under certain circumstances and for water use measurement. As Discussed in the Draft EIR, all Project indoor and outdoor water use will be metered, and the references do not appear to be applicable to the Project.[3242] With respect to the comment references to managing aquifer extractions, Section 5.18, Water Resources, of the Draft EIR provides a discussion of the Antelope Valley Basin Adjudication Judgment and Physical Solution entered by the Superior Court in December 2015 which will govern all Project and other groundwater use in the Antelope Valley Basin.[3243] The Adjudication Judgment and Physical Solution was approved by the Court to sustainably manage Antelope Valley groundwater

[3242] DRP 2017, p. 5.18-40
[3243] DRP 2017, Appendix 5.18-D

resources over time. As a result, groundwater use consistent with the Adjudication Judgment and Physical Solution also takes account of and avoids potential long-term, cumulative impacts to the Antelope Valley Basin. Exhibit 4 to the Adjudication Judgment and Physical Solution allocates overlying production rights in amounts consistent with the Basin's sustainable yield as determined by the Court and provides that, after a seven-year rampdown period applicable to all basin groundwater users, the Tejon Ranch Company has an overlying production right of 1,634 acre feet per year, all of which will be provided to and utilized by the Project. The groundwater component of the Project's water supplies discussed in the Draft EIR is limited to the amount of the overlying production right of 1,634 acre feet per year allocated to Tejon Ranch Company in the adjudication. Consequently, groundwater use by the Project and other parties in the Antelope Valley is governed and managed by the Adjudication Judgment and Physical Solution to ensure the long-term sustainability of the Antelope Valley Basin resources.

Response to Comment J.1-12:

Numerous studies on wildlife movement have been conducted on the Project site, as well as throughout the Project region, and were used to inform the wildlife movement discussions in Section 5.7.3, Environmental Setting, and Section 5.7.6, Environmental Impacts.[3244,3245,3246,3247,3248] Studies on wildlife movement in the Project region have generally shown the Project area as a whole to be largely outside important corridor linking the Sierra Nevada-Cascade Cordillera with the Sierra Madre-Transverse-Peninsular Range Cordillera. SEA 17, which is considered an important corridor for wildlife, will not be impacted by the Project.[3249] Wildlife moving from north of the Project across the SR-138 are expected to use either the crossing at the west side of the Project where the Aqueduct intersects the SR-138, or to travel around the Project and cross to the east of the Project.[3250] In addition, the aqueduct represents a substantial barrier for most species rendering the site less than suitable for substantial movement.[3251] In addition, many green ways will be retained and created on the site, natural and unnatural, which will allow for common urbanized wildlife to move about the Project lands. All applicable State and federal regulations have been applied to the Project and reviewed in the Draft EIR. The combination of mitigation measures and applicable regulations sufficiently reduce impacts of the Project.[3252]

[3244] DRP 2017, Table 5.7-2
[3245] Beier 2003
[3246] Penrod et al. 2003, 2004, and 2005
[3247] Pioneer Environmental Services 2004
[3248] Trust for Public Lands 2004
[3249] DRP 2017, pp. 5.7-8, -155, -194
[3250] *Id.,* p. 5.7-165
[3251] *Ibid.*
[3252] *Id.,* p. 5.7-194

Matt Misenhimer

Response to Comment J.1-13:

Thank you for your comment and for participating in in this public process. This comment expresses an opinion about the Project. This comment does not concern specific potentially significant environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. For reference purposes, the Project's potential environmental effects related to visual resources were fully analyzed in Section 5.13, Visual Resources, of the Draft EIR, which discloses that the Project would cause a significant and unavoidable impact related to visual resources. The Project's potential to affect real estate prices is an economic and social issue, rather than an effect on the environment. Pursuant to CEQA Guidelines Section 15382, an economic or social change by itself shall not be considered a significant effect on the environment and this comment provides no indication of how the Project's potential effects on real estate prices may cause a physical change in the environment. Nevertheless, this comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Response to Comment J.1-14:

This comment expresses an opinion about the Project. This comment does not concern specific potentially significant environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. For reference, the Project's potential effects related to population, housing and employment are fully analyzed in Section 5.9, Population, Housing, and Employment, of the Draft EIR. The Project's potential effects related to visual resources are fully analyzed in Section 5.13, Visual Resources, of the Draft EIR. The Project's potential effects related to biological resources are fully analyzed in Section 5.7, Biological Resources, of the Draft EIR. Please see response to Comment J-13. This comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Patric Hedlund

Response to Comment J.1-15:

Thank you for participation in the public process. The county acknowledges the request for public notices for the Project to be placed in the *Mountain Enterprises* newspaper. The County will attempt to publish any further notices for this Project in the *Mountain Enterprises* newspaper. No further response is required given that the comment does not raise a specific concern regarding the content of the Draft EIR.

Andre Hollings

Response to Comment J.1-16:

Thank for your comment and for your participation in this public process. This comment expresses an opinion about the Project. This comment does not concern specific potentially

significant environmental effects of the Project or the adequacy of the Draft EIR. No further response is required. This comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Dale King

Response to Comment J.1-17:

Thank for your comment and for your participation in this public process. This comment expresses an opinion about the Project. This comment does not concern specific potentially significant environmental effects of the Project or the adequacy of the Draft EIR. No further response is required. This comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Terry Kelling

Response to Comment J.1-18:

Thank for your comment and for your participation in this public process. This comment does not concern specific potentially significant environmental effects of the Project or the adequacy of the Draft EIR. No further response is required. This comment will be included as part of the record and made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

Response to Comment J.1-19:

Please refer to response to Comment F.3-29 discussing new MM 3-11 requiring creation of a website with regularly updated information on ground-disturbing activities and the notification of off-site persons to the presence of this website to seek out information, if desired.

Hearing Officer

Response to Comment J.1-20:

This comment is comprised of closing comments by the County Hearing Examiner and staff. It is not a comment concerning the potential environmental effects of the Project or the adequacy of the Draft EIR and, thus, no further response is required. This comment will be made available to the Regional Planning Commission and Board of Supervisors prior to a final decision on the proposed Project.

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