

## Initial Study

# West Hills Crest

## Residential Project



**County of Los Angeles**  
**Department of Regional Planning**  
320 West Temple Street, Los Angeles, CA 90012

**(213) 974-6433**

**May 2020**

# WEST HILLS CREST RESIDENTIAL PROJECT

## INITIAL STUDY

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*Lead Agency:*

**COUNTY OF LOS ANGELES  
DEPARTMENT OF REGIONAL PLANNING**

320 West Temple Street  
Los Angeles, CA 90012  
Attention: Marie Pavlovic, Regional Planner

May 2020

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# Environmental Checklist Form (Initial Study)

## County of Los Angeles, Department of Regional Planning



**Project title:** West Hills Crest Project / Project No. 98123 / Vesting Tentative Tract Map No. 52652, Conditional Use Permit No. 98123, Oak Tree Permit No. 98123, Environmental Plan No. RPPL2019002981

**Lead agency name and address:** Los Angeles County, 320 West Temple Street, Los Angeles, CA 90012

**Contact Person and phone number:** Marie Pavlovic (213)-974-6433

**Project sponsor's name and address:** Michael Naim  
Naim Associates, LLC  
144 Wetherly Drive  
West Hollywood, CA 90048  
(310) 247-1866

**Project location:** Vesting Tentative Tract Number 52652, West Hills, CA, 91307  
APN: 2031-015-002, 2031-015-003, 2031-015-011, and 2031-015-012. USGS Quad: Calabasas, CA

**Gross Acreage:** 58.03 gross acres

**General plan designation:** 1 (Low Density Residential: 1-6 du/gross ac)

**Community/Area wide Plan designation:** N/A

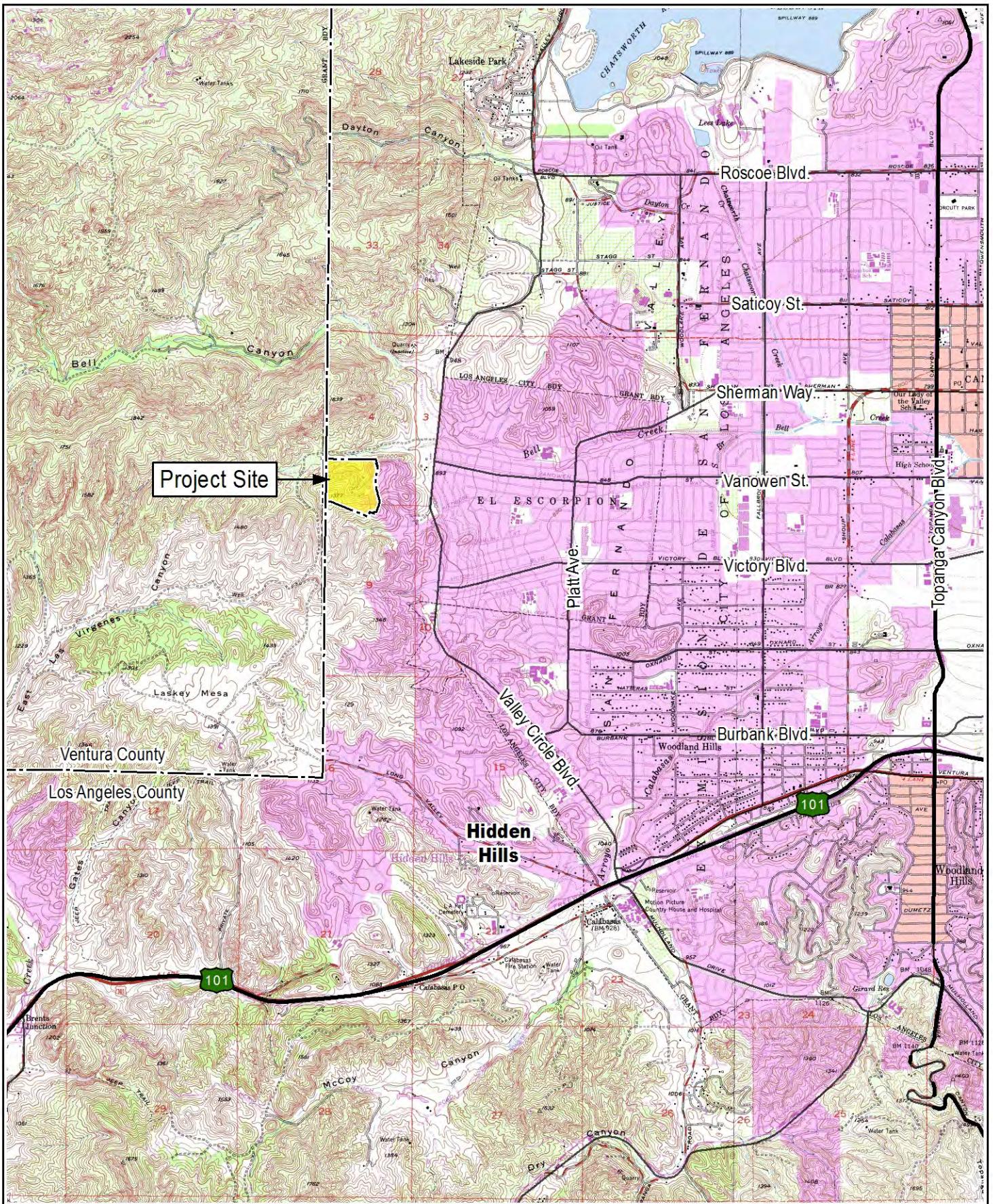
**Zoning:** RPD-30,000-1.5U & R-1-10,000

### Description of project:

The West Hills Crest Residential Project site (hereinafter the "Project Site" or "Project"), is an approximately 58-acre property located on the eastern flank of the Simi Hills at the western end of the San Fernando Valley, north of Hidden Hills, in an unincorporated area of Los Angeles County (see **Figure 1, Project Location Map**). The site is located in an undeveloped area west of Randiwood Lane at the western edge of the San Fernando Valley adjacent to the Ventura County line. It is bordered on the east entirely by a 175-unit single-family residential development across Randiwood Lane, on the north by El Escorpion Park, on the south by Knapp Ranch Park West and a Los Angeles City Department of Water and Power facility including two large water tanks, and on the west by the 5,477-acre Upper Las Virgenes Canyon Open Space Preserve formerly a part of Ahmanson Ranch. The first two parks are in Los Angeles City, and Las Virgenes Canyon is in Ventura County. The northwestern portion of the site is within the Los Angeles County Santa Susana Mountains / Simi Hills Significant Ecological Area (see **Figure 2, Site Vicinity Map**). This portion will remain undeveloped.

The southeast corner of the Project Site is northwest of the intersection of Kittridge Street and Randiwood Lane. Major roads in the surrounding area include Victory Boulevard, Vanowen Street, Valley Circle





Sources: U.S.G.S. Topographic Quadrangle Map Mosaic.

WEST HILLS CREST RESIDENTIAL PROJECT - ADMINISTRATIVE DRAFT INITIAL STUDY

## Project Location Map

0 2,000 4,000 Feet



FIGURE 1

envicom





Aerial Source: GoogleEarth Pro, Nov. 19, 2018.

WEST HILLS CREST RESIDENTIAL PROJECT – INITIAL STUDY

envicom

# Site Vicinity Map





Boulevard, and Bell Canyon Road. The site is located within Section 4 and Section 9, Township 1N, Range 17W of the USGS 7.5' Calabasas topographic quadrangle map

The site consists predominantly of moderate to steep hillsides. Elevations on the site range from approximately 1,250 to 1,380 feet above mean sea level (msl). The site is undeveloped, though a portion was previously graded, with a mix of native and non-native vegetation, and contiguous to the north and west with large tracts of native habitat and open space areas. Disturbed areas at the site include old roadbeds and trails, and significantly modified slopes with terrace drains, as well as several acres that are dominated by non-native herbaceous grasses and forbs. The site presumably was grazed historically. There is a disked fuel modification zone along the site's eastern boundary, which protects the existing residential development east of Randiwood Lane. There are some level areas in the northeastern and southwestern portions of the site, which may have been previously graded, although not recently and portions of the site have significant fill from prior activity. There are no prominent drainages at the site; however, there are some erosional features on north-facing slopes along the northern boundary of the site. A total of fifteen oil wells are located on site, the remains of five of which were observed in site reconnaissance and ten were reported in the Department of Oil, Gas, and Geothermal Resources (DOGGR) files.<sup>1</sup> DOGGR identifies the Project Site as located within the Canoga Park oil/gas field #108, a small field in the West San Fernando Valley where drilling began in the 1940s, according to available records. The DOGGR files identify seven as plugged, two as buried/idle, and one as a dry hole, and DOGGR preliminarily indicated two wells may be leaking oil and/or gas.

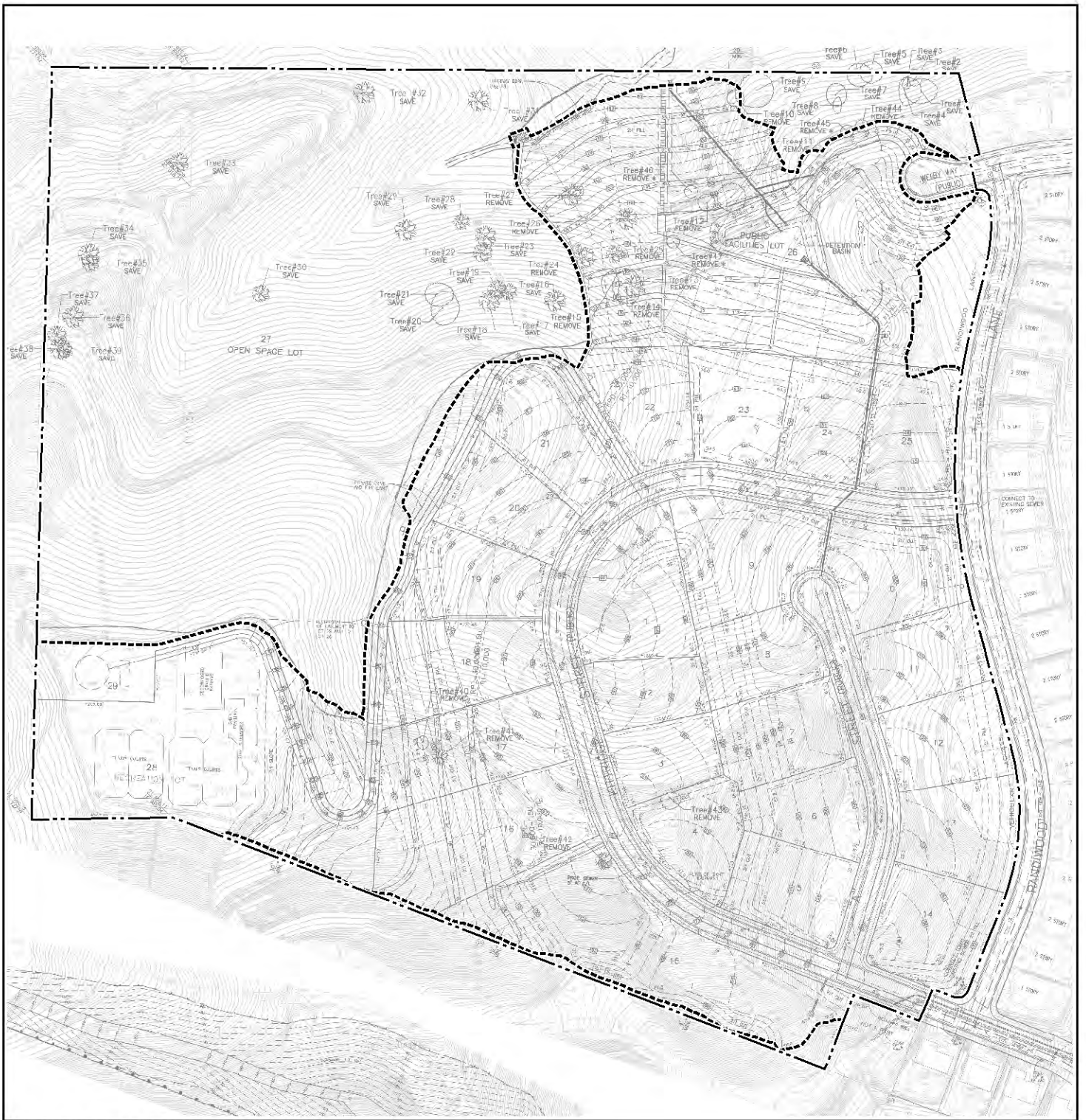
The applicant is proposing a land division and low density single-family residential development for the site, which would include 25 residential lots, public streets, a recreation lot, a public facilities lot, one water tank lot, and an approximately 26-acre open space lot. The northwestern portion of the site would be preserved as open space. The proposed Project has an approved Conditional Use Permit (CUP), oak tree permit to remove 14 oak trees and encroach upon 1 oak tree, and a tract map to allow the development of twenty-five single family lots, one recreation lot, one water tank lot, one public facilities lot, and one open space lot. A storm drainage easement and a detention basin are proposed for the northeast portion of the property. The total property consists of 58.03 acres and the Project would include 975,000 cubic yards of cut grading and an equal volume of fill grading to be balanced on site.

The Project consists of four parcels, Assessor's Identification Numbers 2031-015-002, 2031-015-003, 2031-015-011, and 2031-015-012. The land use designation for the Project Site is Rural Land 2 (RL-2) and allows for single family residences, equestrian and limited animal uses, and limited agricultural and related activities. The density allowed is a maximum of 1 dwelling unit per 2 gross acres or a maximum floor area ratio of 0.5 for non-residential buildings. The Project site is zoned as RPD-30,000-1.5U (Residential Planned Development – 30,000 square feet minimum lot size – 1.5 dwelling units per acre) and R-1-10,000 (single-family residence, 10,000 square feet minimum). To the east of the Project Site is an existing neighborhood zoned as R-1-11,000 (Single Family Residential – 11,000 square foot minimum). Properties to the north and south of the Project Site are parks within the City of Los Angeles and are zoned for Open Space. The Project includes various components typical of a new housing tract. The site plan is shown in **Figure 3, Site Plan**.

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<sup>1</sup> DOGGR, Well Finder, Accessed on December 6, 2019 at: <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.66347/34.19308/16>.





Source: Site Plan, Spindler Engineering CP, January 2017.

### Legend

- Property Boundary
- ..... Limits of Grading



**Table 1**  
**Proposed Land Uses**

Land Use	Net Area (acres) <sup>1</sup>
<i>Residential Development</i>	
Lot 1	1.01
Lot 2	0.52
Lot 3	0.54
Lot 4	0.68
Lot 5	0.74
Lot 6	0.64
Lot 7	0.77
Lot 8	0.67
Lot 9	1.06
Lot 10	0.90
Lot 11	0.72
Lot 12	0.76
Lot 13	0.80
Lot 14	0.88
Lot 15	2.49
Lot 16	1.52
Lot 17	1.09
Lot 18	0.99
Lot 19	0.80
Lot 20	0.73
Lot 21	0.82
Lot 22	0.80
Lot 23	0.76
Lot 24	0.73
Lot 25	0.80
<i>Residential Development Subtotal</i>	<b>22.22</b>
Lot 26 (Public Facilities)	0.80
Lot 27 (Open Space)	26.47
Lot 28 (Recreation Lot)	3.85
Lot 29 (Water Tank Lot)	0.89
Streets	3.80
<b>Total Project Area</b>	<b>58.03</b>
<sup>1</sup> This accounts for the area within each lot to the property line of all adjacent streets.	

### **Residential**

The Project would provide 25 single family residences on lots ranging from 0.61 to 2.86 gross acres, (.52 to 2.49 net acres) refer to **Table 1, Proposed Land Uses**. Access to the residences would be through an extension of Kittridge Street that would be extended to connect in a loop to the approximate midpoint of Randiwood Lane. Building pads on proposed Lots 1 through 15 and 23 through 25 are proposed to be within



the R-1-10,000 zoned area. Building pads on Lots 16 through 22 are proposed to be in both the R-1-10,000 and RPD-30,000-1.5U zones.

### **Public Facilities**

Lot 26, a flag lot with a 33-foot-wide access strip on the northeast corner of the property, would be the public facilities lot and include the detention basin.

### **Open Space**

Lot 27, consisting of 26.47 acres, would be open space. This meets the requirement of a minimum 30 percent permanent open space under common ownership in the RPD-zoned portion of the property. The open space portion within the RPD zone would consist of 71 percent of the RPD zoned portion of the property.

### **Recreation**

Lot 28, a flag lot located at the southwest corner of the property, would provide recreational amenities consisting of four tennis courts, a parking lot, and a shade structure. There would also be a variable width easement for the Rim of the Valley Trail in the northwest corner of the property.

### **Water Tank**

Lot 29, immediately north of the tennis courts, would contain two large water storage tanks that would be dedicated to the Las Virgenes Municipal Water District and would supplement fire flows to the surrounding area.

### **Circulation System**

Regional access to the Project Site is via U.S. Route 101 from the south and California State Route 118 from the north. California State Route 27, Topanga Canyon Road to the east, is the closest major thoroughfare that can be accessed from both U.S. Route 101 and California State Route 118. Directly adjacent to the proposed Project site is Kittridge Street to the southeast, Randiwood Lane to the east, and Welby Way to the northeast. Access to the Project would be through an extension of Kittridge Street that would loop to connect to Randiwood Lane. A cul-de-sac would connect from the Kittridge Street extension to would provide access to 10 of the single-family lots.

### **Grading**

The Project proposes 975,000 cubic yards of cut and 975,000 cubic yards of fill balanced on site.

### **Objectives**

The underlying purpose of the Project is to provide 25 single family residences in the western Los Angeles County community of West Hills. The following is a list of the objectives and goals of the Project:

- Develop 25 single family residences on a range of lot sizes in an area designated for residential development;
- Provide recreational amenities for the residences, reducing use of existing parks and vehicle trips to access existing facilities;
- Provide a lot to the Las Virgenes Water District to place additional water storage tanks to provide adequate water pressure for the Project Site and to improve pressure for the existing residential subdivision adjacent to the Project Site on the east and storage capacity for fire suppression; and,
- Dedicate 26.47 acres, which represents approximately 46 percent of the Project Site as open space extending the park lands north and west of the Project Site.

**Surrounding land uses and setting:**

The Project property is in an unincorporated portion of LA County and is currently undeveloped, with non-native and native vegetation including coastal sage scrub, chaparral, coast live oak woodland, and southern California walnut woodland. There are several unofficial trails located on the Project Site and the slope varies from 24 percent to over 50 percent. Suburban development, including an existing 175-unit single-family residential subdivision along the entire eastern boundary across Randiwood Lane, abuts the Project Site on three sides. To the north is the El Escorpion Park and to the south is Knapp Ranch Park, both of which are City of Los Angeles public parks. To the west is the Las Virgenes Canyon Open Space Preserve. Five fires have burned the site or portions of the site since 1967. The Devonshire – Parker Fire burned nearly the entire site except for a small portion of its eastern end in October 1967. The Clampitt Fire burned the entire site in September 1970, and the Dayton Canyon Fire burned the approximate western two-thirds of the site in October 1982. The Topanga Fire of September 2005, which burned nearly the entire site leaving only the eastern margin of the property intact. The last fire to affect the site was the Woolsey fire, which burned nearly the entire site in November 2018.

**Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code § 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

Tribal consultation is the responsibility of the Lead Agency, in this case, Los Angeles County Department of Regional Planning (LACDRP). The LACDRP is an agency experienced in the consultation process and strives to be inclusive as it seeks input from Native American tribes traditionally and culturally affiliated with the Project area. Additional information will be provided as it becomes available.

**Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):**

<i>Public Agency</i>	<i>Approval Required</i>
<u>Las Virgenes Municipal Water District</u>	<u>Will Serve Letter</u>

**Major projects in the area:**

<i>Project/ Case No.</i>	<i>Description and Status</i>
<u>TR073776</u>	<u>A pending request to create 46 single-family lots, one water tank lot, one private driveway lot, and 3 open space lots within a SEA, HMA and grading exceeding 100,000 c.y.</u>



**Reviewing Agencies:** [See CEQA Appendix B to help determine which agencies should review your project]

*Responsible Agencies*

- ☐ None  
Regional Water Quality Control Board:  
☒ Los Angeles Region  
☐ Lahontan Region  
☐ Coastal Commission  
☐ Army Corps of Engineers  
☐ LAFCO

*Special Reviewing Agencies*

- ☒ None  
☐ Santa Monica Mountains Conservancy  
☐ National Parks  
☐ National Forest  
☐ Edwards Air Force Base  
☒ Mountains Recreation and Conservation Authority  
☐

*Regional Significance*

- ☐ None  
☐ SCAG Criteria  
☒ SCAQMD  
☐ Water Resources  
☐ Santa Monica Mtns. Area  
☐

*Trustee Agencies*

- ☐ None  
☒ State Dept. of Fish and Wildlife  
☐ State Dept. of Parks and Recreation  
☐ State Lands Commission  
☐ University of California (Natural Land and Water Reserves System)

*County Reviewing Agencies*

- ☒ DPW  
☒ Fire Department  
- Forestry, Environmental Division  
- Planning Division  
- Land Development Unit  
- Health Hazmat  
☒ Sanitation District  
☒ Public Health/Environmental Health Division: Land Use Program (OWTS), Drinking Water Program (Private Wells), Toxics Epidemiology Program (Noise)  
☒ Sheriff Department  
☒ Parks and Recreation  
☐ Subdivision Committee  
☐

- ☒ City of Calabasas  
☒ City of Los Angeles  
☒ City of Los Angeles Neighborhood Council – West Hills  
☒ Los Angeles County Natural History Museum  
☒ School- Las Virgenes Unified School District

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

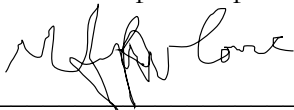
The environmental factors checked below would be potentially affected by this project.

- |  |   |  |
|--|---|--|
| <input checked="" type="checkbox"/> Aesthetics           | <input type="checkbox"/> Greenhouse Gas Emissions               | <input checked="" type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Agriculture/Forestry            | <input checked="" type="checkbox"/> Hazards/Hazardous Materials | <input type="checkbox"/> Recreation                                    |
| <input type="checkbox"/> Air Quality                     | <input checked="" type="checkbox"/> Hydrology/Water Quality     | <input checked="" type="checkbox"/> Transportation                     |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use/Planning                      | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input checked="" type="checkbox"/> Cultural Resources   | <input type="checkbox"/> Mineral Resources                      | <input type="checkbox"/> Utilities/Services                            |
| <input type="checkbox"/> Energy                          | <input checked="" type="checkbox"/> Noise                       | <input checked="" type="checkbox"/> Wildfire                           |
| <input type="checkbox"/> Geology/Soils                   | <input type="checkbox"/> Population/Housing                     | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

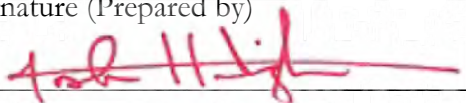
DETERMINATION: (To be completed by the Lead Department.)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature (Prepared by)



Signature (Approved by)

May 8, 2020

Date

May 18, 2020

Date



## EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources the Lead Department cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the Lead Department has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level. (Mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced.)
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA processes, an effect has been adequately analyzed in an earlier EIR or negative declaration. (State CEQA Guidelines § 15063(c)(3)(D).) In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of, and adequately analyzed in, an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 7) The explanation of each issue should identify: the significance threshold, if any, used to evaluate each question, and; mitigation measures identified, if any, to reduce the impact to less than significance. Sources of thresholds include the County General Plan, other County planning documents, and County ordinances. Some thresholds are unique to geographical locations.

## 1. AESTHETICS

<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista?      ☒      ☐      ☐      ☐

The following aesthetics analysis is primarily based on the West Hills Crest Viewshed Analysis (Viewshed Analysis), prepared by Envicom Corporation, (Envicom) dated October 2019, and included as **Appendix A**.

**Potentially Significant Impact.** According to Chapter 9, Conservation and Natural Resources Element, of the County General Plan, a scenic vista is a panoramic public view from a specific location, such as a highway, a park, a hiking trail, river/waterway, or even from a particular neighborhood. A scenic viewshed provides a scenic vista from a specific location and the boundaries of a viewshed are defined by the field of view to the nearest ridgeline. Scenic viewsheds vary by location and community and can include ridgelines, unique rock outcroppings, waterfalls, ocean views or various other unusual or scenic landforms.<sup>2</sup>

The Project is located in unincorporated Los Angeles County in the West Hills community, east of the Ventura County boundary, north of Victory Boulevard, and west of Valley Circle Boulevard, as seen in **Figure 4, Aerial Photograph of Site and Surrounding Area**. The Project would develop a currently vacant site with 25 single-family residences. The Project site is not located within the vicinity of a designated or eligible scenic highway, significant ridgeline, or other County-designated natural and scenic resource.<sup>3</sup> Based upon the General Plan's definition of a scenic vista, views from public roadways, parks, and trails in the vicinity that provide substantial views of the Project Site have been evaluated. The Viewshed Analysis analyzed the Project's visibility from various view locations within the vicinity of the Project site including El Escorpion Park, Las Virgenes Canyon Open Space Preserve, Knapp Ranch Park, and Randiwood Lane.

The Project considers impacts to views from public roadways, such as Randiwood Lane, Kittridge Street and Welby Way. As shown in the Viewshed Analysis, the Project site is partially visible from Randiwood Lane. However, the proposed Project Site's visibility from the public roadways would be decreased due to the range in elevation on the site, as the proposed residential structures are setback from the roadway and would be largely blocked due to the gradual, westerly sloping terrain. The Project would also provide screening by clusters of native trees and vegetation along the perimeter of the Project boundary, and therefore would reduce views of the Project site from the public roadway. Additionally, the Project considers impacts to views from public parkland including El Escorpion Park and Knapp Ranch Park, administered by the City of Los Angeles, Bell Canyon State Park and the Las Virgenes Open Space Preserve. As shown in the Viewshed Analysis, the Project site is partially visible from El Escorpion Park and Las Virgenes Canyon Open Space Preserve and is not visible from Knapp Ranch Park. While it is expected that the installation of landscaping vegetation as screening would cause impacts on scenic vistas to be less than significant, additional detailed analysis and further discussion will be provided in the EIR.

<sup>2</sup> Los Angeles County, General Plan Chapter 9: Conservation and Natural Resources Element, Adopted October 6, 2015.

<sup>3</sup> County of Los Angeles Department of Regional Planning, GIS-NET Public, Accessed on September 25, 2019 at: <http://planning.lacounty.gov/gis/interactive>.





Aerial Source: GoogleEarth Pro, Nov. 19, 2018.



b) Be visible from or obstruct views from a regional riding, hiking, or multi-use trail?



**Potentially Significant Impact.** The Project will be visible from trails within both El Escorpion Park to the north and the Las Virgenes Canyon Open Space Preserve to the west. In general, visibility of a proposed Project does not necessarily constitute a significant impact. As stated previously, a scenic viewshed provides a scenic vista from a given location, such as a highway, a park, a hiking trail, river/waterway, or even from a particular neighborhood. The boundaries of a viewshed are defined by the field of view to the nearest ridgeline.<sup>4</sup> Modifications to viewsheds are considered less than significant if they would largely be unnoticeable or visually subordinate to existing predominant features within the viewshed containing the Project Site. A modification that would substantially obstruct available views of existing scenic features would result in a significant impact.

As shown in the Viewshed Analysis, the Project site is partially visible from El Escorpion Park and Las Virgenes Canyon Open Space Preserve and is not visible from Knapp Ranch Park. However, present views from El Escorpion Park and the Las Virgenes Canyon Open Space Preserve are dominated by existing and expansive residential and commercial development within the greater San Fernando Valley. As such, the addition of 25 single-family residences within view of the trails would not cause a substantial impact in addition to the expansive views overlooking the San Fernando Valley. Knapp Ranch Park contains clusters of trees along the perimeter of the park include along Kittridge Street and extending northwest towards the Project site. These trees provide heavy screening from existing residential development in the area and as shown in the Viewshed Analysis, the Project site is not visible from Knapp Ranch Park As such, the Project is expected to have a less than significant impact to viewpoints within Knapp Ranch Park. Nevertheless, additional detailed analysis and further discussion will be provided in the EIR.

c) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?



**Potentially Significant Impact.** According to the Scenic Highway Element of the 1980 General Plan, a scenic highway is defined as a road which, in addition to its transportation function, provides opportunities for enjoyment of natural and manmade scenic resources where aesthetics values are protected and enhanced. Chapter 9, Conservation and Natural Resources Element, of the County General Plan, a highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. To be designated as an official state scenic highway, the County must create a corridor protection program and contain the following five elements related to preserving the nominated scenic highway:

- Regulation of land use and density of development;
- Detailed land and site planning;
- Control of outdoor advertising;
- Careful attention to and control of earthmoving and landscaping; and
- Attention to design and appearance of structures and equipment.

<sup>4</sup> Los Angeles County, General Plan Chapter 9: Conservation and Natural Resources Element, Adopted October 6, 2015

Regional access to the Project Site is provided by the U.S. Route 101 (or Ventura Freeway) from the south and California State Route 118 from the north. As shown on the Department of Transportation's Scenic Highway Mapping System<sup>5</sup>, these particular portions of the highway are not officially designated as state scenic highways. Trees and rock outcroppings are located sporadically within the Project Site development footprint, but are not located within view of a state scenic highway. Therefore, it is not expected that the Project would substantially damage scenic resources within view of a state scenic highway corridor.

Additionally, views from the Project site of both U.S. Route 101 and California State Route 118 are constrained by variations in land topography and the Project location is not visible from these highways. The U.S. Route 101 is approximately three miles south of the Project site and California Route 118 is approximately 6 miles north of the Project site. Both highways are visually separated by existing topography and are not visible from the Project area.

The County of Los Angeles General Plan designates Old Topanga Canyon Road as a "route with scenic qualities." The Project site is not visible from Old Topanga Canyon Road. Other County-designated scenic routes in the Project region include the Ventura Freeway, Mulholland Highway, Las Virgenes Road, and Kanan-Dume Road.<sup>6</sup> The Project site is not visible from these roadways. Therefore, potential visual impacts regarding scenic resources such as trees, rock outcroppings, or historic buildings are expected to be less than significant. Nevertheless, additional detailed analysis and further discussion will be provided in the EIR.

**d) Substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from publicly accessible vantage point)**



**Potentially Significant Impact.** The visual character of the existing Project site is characterized by undeveloped, partially graded open land with native and invasive vegetation. The surrounding area is primarily characterized by single-family residential development to the east and open space to the north, west, and south. The Project site is surrounded by moderate slopes that transition to steeper slopes as elevations rise to the local ridges of the surrounding hillsides.

The proposed Project would involve permanent changes to the site due to the replacement of existing undeveloped land with 25-single family homes, a public facilities lot (which includes a detention basin), recreational amenities, water tank lot and a large open space lot. While the proposed Project would result in physical changes to the previously undeveloped site, it would not substantially alter the visual character of the area, as the Project is consistent with the existing visual setting of suburban residential development interspersed with open space. The site's modification would have a marginal impact, as the Project would add low density residential development and additional open space to this setting. Therefore, the Project would not significantly degrade the existing visual character or quality of the site and its surroundings.

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<sup>5</sup> Caltrans, California Scenic Highway Mapping System, Los Angeles County, Accessed on June 19, 2019 at: [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/).



The County will review the proposed Project plans for consistency and compliance with the applicable guidelines along with development standards in County Code to determine if the Projects meets and complies with the Guidelines. Additionally, the Project will incorporate the installation of vegetation as screening, which provides natural clusters of trees along the Project boundary to screen existing residential views from the Project site. Nevertheless, additional detailed analysis and further discussion will be provided in the EIR.

e) Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area?



**Potentially Significant Impact.** The Project would introduce outdoor light sources, including street lighting and parking lot lighting for residential uses. The Project would also introduce tennis courts that could include nighttime lighting. The Project would comply with all regulations, for streetlights, street signage and outdoor recreational facility signage. Compliance with County regulations would ensure the proposed exterior lighting would constitute a reasonable use of outdoor lighting and would ensure Project-related light sources remain directed on-site or on roadways, as appropriate. Nevertheless, additional detailed analysis and further discussion will be provided in the EIR.

## 2. AGRICULTURE / FOREST

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>Would the project:</b>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**No Impact.** According to the California Natural Resources Agency, Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP), the Project site is not located within an area containing Prime Farmland, Unique Farmland, or other Farmland of Statewide Importance.<sup>7</sup> The Project site falls within the category “other land,” which is land not included in other mapping categories and is vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres. No agricultural uses or related operations are present on the Project site or surrounding urban area and the Project will not convert to non-agricultural use any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the Project would have no impact on FMMP-designated Important Farmlands and no mitigation measures are required.

b) Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**No Impact.** The land use designation for the parcel is Low Density Residential (1) and allows for single family residences, equestrian and limited animal uses, and limited agricultural and related activities by the General Plan. The Project is divided between two zoning classifications. They are RPD-30,000-1.5U (Residential Planned Development – 30,000 square feet minimum lot size – 1.5 dwelling units per acre) and R-1-10,000 (single- family residence, 10,000 square feet minimum). The Project site and surrounding vicinity are not zoned for agricultural use and there is no farmland located at the Project site. The Project site is not located within Williamson Act Contract Land.<sup>8</sup> Therefore, the Project would not conflict with zoning for agricultural use, with a designated Agricultural Resource Area or with a Williamson Act contract and the Project would have no impact.

<sup>7</sup> California Natural Resources Agency. Department of Conservation. Division of Land Resource Protection. Farmland Mapping and Monitoring Program. 2016. Los Angeles County Important Farmland.

<sup>8</sup> California Department of Conservation. 2017. State of California Williamson Act Contract Land.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g))?

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**No Impact.** As described above, the Project site is divided between two zoning classifications: RPD-30,000-1.5U and R-1-10,000 and does not include parcels zoned for forest land, timberland, or timberland production by the County Zoning Code. Moreover, adjacent zoning reflects residential and open space/recreational uses. Therefore, the Project would have no impact related to forest land, timberland, or timberland production zoning and no mitigation measures are required.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

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**No Impact.** The Project will not result in the loss or conversion of forest land to non-forest use. The site is a currently undeveloped upland parcel in unincorporated LA County adjacent to the City of Los Angeles community of West Hills and is not located within and does not contain designated forest land. Since the Project site would not result in the loss of forest land or convert designated forest land to non-forest use, it would have no impact related to these issues.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

☐☐☐☒

**No Impact.** As described above, the Project Site does not contain forest or agricultural land, nor is it designated for either type. The Project also does not abut agricultural or forest land, it includes a substantial amount of open space to buffer surrounding open space areas from the proposed residential development. The Project does not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non- agricultural use or conversion of forest land to non-forest use. The Project will have no impact with respect to the conversion of farmland.



### 3. AIR QUALITY

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following air quality analysis is primarily based on the Air Quality Impact Analysis, prepared by Envicom Corporation, dated March 14, 2017, and included as **Appendix B**.

**Less Than Significant Impact.** The South Coast Air Quality Management District (SCAQMD) outlines the air pollution measures needed to meet the federal health-based standards for ozone and particulates. The governing board of the SCAQMD adopted the most recent version of the 2016 Air Quality Management Plan (AQMP) on March 3, 2017, which has been submitted to the California Air Resources Board for forwarding to the Environmental Protection Agency.<sup>9</sup> The Project is an allowable use under the County General Plan land use designation and is consistent with regional growth projections. However, the SCAQMD does not favor designating regional impacts as less than significant solely because the proposed development is consistent with regional growth projections. Therefore, the impact of the proposed Project on air quality was analyzed on a project-specific basis. The results are presented below where both construction and operational daily maximum emissions would not exceed SCAQMD standards and therefore would comply with the provisions within the AQMP.

During construction, dust is typically the primary concern of residential tracts where land clearing and grading are proposed. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions." The Project would comply with SCAQMD Rule 403 during construction regarding fugitive dust. This rule aims to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic fugitive dust sources and would comply with Rule 403 by applying the best available control measure, which is watering the soil during construction to minimize air pollutants released during the movement of soil. Emission rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). Certain parameters are not known with any reasonable certainty prior to Project development and may change from day to day. Any assignment of specific parameters to an unknown future date is speculative and conjectural. Because of the inherent uncertainty in the predictive factors for estimating fugitive dust generation, regulatory agencies typically use one universal "default" factor based on the area disturbed assuming that all other input parameters into emission rate prediction fall into midrange average values. This analysis for the Project incorporates those reasonable assumptions.

<sup>9</sup> South Coast Air Quality Management District, Air Quality Management Plan, Accessed on June 17, 2019 at: <https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>.

Estimated construction emissions were modeled using CalEEMod2016.3.1 to identify maximum daily emissions for each pollutant during Project construction. CalEEMod was developed by the SCAQMD to provide a model by which to calculate both construction emissions and operational emissions from a variety of land use projects. It calculates both the daily maximum and annual average emissions for criteria pollutants as well as total or annual greenhouse gas (GHG) emissions. The output reports from CalEEMod are included with Appendix B to this report.

Utilizing this indicated equipment fleet, for the proposed Project, the Project's maximum daily construction emissions as calculated by CalEEMod are listed in **Table 2, Maximum Daily Construction Emissions**.

**Table 2**  
**Maximum Daily Construction Emissions (pounds/day)**

	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM-10	PM-2.5
<b>Maximum Daily Construction Emissions*</b>	8.8	68.0	40.0	0.06	7.6	4.9
SCAQMD Thresholds	75	1005	550	150	150	55
Significant Impact? Y/N	No	No	No	No	No	No
Source: CalEEMod output, March 2, 2017.						
* CalEEMod project emissions estimates based on required compliance with SCAQMD Rule 403 minimizing fugitive dust by watering exposed surfaces during construction.						

As seen in Table 2, peak daily construction activity emissions of criteria air pollutants are estimated to be far below SCAQMD thresholds. Additionally, all construction grading projects in the County of Los Angeles must comply with the requirements of SCAQMD Rule 403, Fugitive Dust, which requires the implementation of Reasonably Available Control Measures (RACM) for all fugitive dust sources. SCAQMD Rule 403, Control Measure 08-2 states that during earth moving activities, projects are required to "Re-apply water as necessary to maintain soils in a damp condition and to ensure that visible emissions do not exceed 100 feet in any direction." Therefore, pursuant to SCAQMD Rule 403, the Project would be required implement adequate watering of exposed surfaces during the site preparation and grading phases. Therefore, the Project would have less than significant construction impacts.

During operations, the proposed residences would result in air quality emissions of criteria pollutants from area sources, energy sources, and mobile sources. The SCAQMD thresholds for air quality impacts from operations are shown below in **Table 3, Maximum Daily Operations Emissions**.

**Table 3**  
**Maximum Daily Operations Emissions (pounds/day)**

Daily Emissions	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM-10	PM-2.5
Area	8.23	0.54	14.79	0.03	1.92	1.92
Energy	0.03	0.23	0.10	0.00	0.02	0.02
Mobile	0.57	2.64	7.83	0.02	1.83	0.51
<b>Total</b>	8.82	3.41	22.72	0.06	3.77	2.45
SCAQMD Thresholds	55	55	550	150	150	55
Significant Impact? Y/N	No	No	No	No	No	No
Source: CalEEMod output, March 2, 2017.						

As seen in Table 3, the Project's operational emissions would be far below SCAQMD thresholds; therefore, operational impacts would be less than significant. The proposed Project's estimated emissions from construction and operations would not exceed any SCAQMD significance thresholds for criteria pollutant emissions. Consequently, the Project would not result in a cumulatively considerable air quality impact, and the Project's cumulative air quality impact would be less than significant.

Given that the Project is an allowable use under the General Plan designation and zoning, the small scale of the Project, the results of the emissions analysis, and the best available control measure to prevent significant fugitive dust levels, the Project would have a less than significant impact regarding implementation of the applicable air quality plan.

**b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?**

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**Less Than Significant Impact.** The non-attainment regional pollutants of concern are ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>. If an area is in nonattainment for a criteria pollutant, then the background concentration of that pollutant has historically exceeded the ambient air quality standard and if a Project exceeds the regional threshold for that nonattainment pollutant, then it would result in a cumulatively considerable net increase of that pollutant and result in a significant cumulative impact. As the Basin is currently in non-attainment for ozone and PM-10, cumulative development, such as that represented by the proposed Project and related projects, has the potential to violate an air quality standard or contribute to an existing or projected air quality violation, which is typically considered to be a potentially significant cumulative impact under CEQA.

According to the SCAQMD, individual construction projects that exceed the SCAQMD recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. The proposed Project's estimated emissions from construction or operations would not exceed any SCAQMD significance thresholds for criteria pollutant emissions. In terms of localized air quality, construction of the Project, without mitigation, would not exceed SCAQMD LST screening thresholds. Consequently, the Project would not result in a cumulatively considerable air quality impact, and the Project's cumulative air quality impact would be less than significant.

**c) Expose sensitive receptors to substantial pollutant concentrations?**

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**Less Than Significant Impact.** Sensitive receptors are persons with the greatest sensitivity to air pollution exposure and include young children, the elderly and the acutely and chronically ill (e.g., those with cardio-respiratory disease, including asthma). For this Project, nearby residences are considered to be sensitive uses because they may be occupied for extended periods, and residents may be outdoors when exposure is highest.

The SCAQMD has developed analysis parameters to evaluate ambient air quality on a local level in addition to the more regional emissions-based thresholds of significance. These analysis elements are called Localized Significance Thresholds (LSTs). LSTs are only applicable to the following criteria pollutants: NO<sub>x</sub>, CO, PM-10, and PM-2.5. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area and



distance to the nearest sensitive receptor. Use of an LST analysis for a Project is optional. LSTs were developed in response to Governing Board's Environmental Justice Enhancement Initiative 1-4 and the LST methodology was provisionally adopted in October 2003 and formally approved by SCAQMD's Mobile Source Committee in February 2005. For the proposed Project, the primary source of possible LST impact would be during construction.

LST screening tables provide thresholds for 25, 50, 100, 200 and 500-meter source-receptor distances. Due to existing residences located within 25 meters of the eastern Project boundary, the 25-meter thresholds were considered for this Project. LST pollutant screening level concentration data is currently published for 1, 2 and 5-acre sites. For this Project, thresholds for a 5-acre site was used, although the approximately 35-acre Project development area is considerably larger and would generally have equipment operating at much greater distances from existing residences and in a less concentrated area. This evaluation is based on estimated daily construction emissions for the phase and year representing the highest daily emissions. Daily averages would be lower than the reported maximum amounts.

**Table 4, Local Significance Thresholds (LST) and Peak Daily Onsite Emissions**, shows the relevant thresholds and the estimated peak daily onsite emissions during the construction phases that would generate the highest level of onsite emissions for each pollutant evaluated for LST impacts. All construction projects in the County of Los Angeles must comply with the requirements of SCAQMD Rule 403, Fugitive Dust, which requires the implementation of Reasonably Available Control Measures (RACM) for all fugitive dust sources, and the AQMP, which identifies Best Available Control Measures (BACM) and Best Available Control Technologies (BACT) for area sources and point sources, respectively. Pursuant to SCAQMD Rule 403, the Project would be required implement adequate watering of exposed surfaces during the site preparation and grading phases.

**Table 4**  
**Local Significance Thresholds (LST)**  
**and Peak Daily Onsite Emissions (pounds/day)**

<b>LST 5.0 acre/25 meters</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>PM-10</b>	<b>PM-2.5</b>
<b>West San Fernando Valley</b>				
LST Threshold	221	1,158	11	6
<b>Peak Onsite Daily Emissions <sup>a</sup></b>	<b>68</b>	<b>40</b>	<b>7.6</b>	<b>4.9</b>
Significant Impact? Y/N	No	No	No	No
Source: CalEEMod output, March 2, 2017.				
<sup>a</sup> PM-10 and PM-2.5 emissions estimates include compliance with SCAQMD Rule 403 requirements of water application for fugitive dust suppression.				

As seen in Table 4, the peak onsite emissions during construction would not exceed the applicable SCAQMD LSTs, and as such, potential LST impacts would be less than significant.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

☐      ☐      ☒      ☐

**Less Than Significant Impact.** The SCAQMD's role is to protect the public's health from air pollution by overseeing and enforcing regulations. The SCAQMD's resolution activity for odor compliance is mandated under California Health & Safety Code Section 41700 and falls under SCAQMD Rule 402. The impact of an odor results from interacting factors such as frequency, intensity, duration, offensiveness, location, and

sensory perception. Odor-related symptoms reported in a number of studies include nervousness, headache, sleeplessness, fatigue, dizziness, nausea, loss of appetite, stomach ache, sinus congestion, eye irritation, nose irritation, runny nose, sore throat, cough, and asthma exacerbation. The SCAQMD recommends that odor impacts be addressed in a qualitative manner. Such an analysis shall determine whether the Project would result in excessive nuisance odors, as defined under the California Code of Regulations and Section 41700 of the California Health and Safety Code, and thus would constitute a public nuisance related to air quality.

According to the SCAQMD CEQA Air Quality Handbook, land uses typically producing objectionable odors include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project includes residential uses, which are not listed by the SCAQMD as a land use that produces objectionable odors. Other odors, including the smells of oil or diesel fuels, would be limited to Project construction and are highly localized and therefore would not disturb sensitive receptors, which are existing residences located within 25 meters of the eastern Project boundary. All off-road construction equipment would be covered by the ARB anti-idling rule (§2449(d)(2)), which limits idling to five minutes. Project construction would be temporary and would not produce odors long term. Therefore, the Project would not generate objectionable odors affecting a substantial number of people and impacts would be less than significant.

#### 4. BIOLOGICAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following biological resources analysis is primarily based on the Biological Resources Inventory and Impact Analysis, prepared by Envicom Corporation, dated October 31, 2017, revised December 2018. A revised Biological Report is currently being prepared and the findings will be incorporated in the EIR.

**Potentially Significant Impact.** There is a small population of narrowleaf queen's-root (*Stillingia linearifolia*) within the grading footprint, which would be removed by the Project. Narrowleaf queen's-root is rare in the region and is considered locally sensitive by the County of Los Angeles. In addition, Catalina mariposa lilies (*Calochortus catalinae*), were located on the western portion of the site, in areas that would be preserved by the Project as open space. The Catalina mariposa lily is relatively secure locally and does not meet any CNPS criteria, which is why it is not considered locally significant. Many of the special-status species known to occur in the region are presumed to be absent from the Site due to lack of suitable habitat or because the Site is outside of the species known range or distribution.

Many of the special-status wildlife species that may potentially occur at the Site are capable of escaping harm during Project development (e.g., non-nesting birds and foraging bats), including grading or fuel modification, while others are vulnerable to direct impacts, including injury and mortality. In this case, the special-status species that could be directly impacted include potentially occurring land dwelling animals. Ground and vegetation disturbing activities including but not limited to grading and fuel modification, if conducted during the nesting bird season (February 1 to August 31), would have the potential to result in removal or disturbance to trees and shrubs that could contain active bird nests, including ground-nesting species. The loss of protected bird nests, eggs, or young due to Project activities would be a significant, but mitigable impact.

In addition, invasive plant species introduced to the Site in Project landscaping or in fuel modification zones could be dispersed by stormwater, wind, or wildlife, or by various other means to native habitats in the surrounding area, including the open space preserves located adjacent to the site. Additional detailed analysis and further discussion will be provided in the Environmental Impact Report (EIR).

b) Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies,	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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regulations or by CDFW or USFWS?

**Potentially Significant Impact.** Grading for the proposed Project would result in the removal of California walnut woodland at the site, including within the California Walnut / Annual Grass-Herb Woodland Association and the California Walnut / California Sagebrush Woodland Association, which are considered to be sensitive plant communities by the California Department of Fish and Wildlife (CDFW). Grading for the proposed Project would result in the removal of California encelia scrub, including within the California Encelia Shrubland Alliance, which is considered to be a sensitive natural community by the CDFW. Additionally, grading for the proposed Project would result in the removal of Sawtooth goldenbush scrub, including within the Sawtooth Goldenbush/Annual Grass-Herb Shrubland Phase, which is considered to be a sensitive plant community by the California Department of Fish and Wildlife (CDFW). Grading for the Project would also result in the removal of 0.25 acres of oak woodland canopy area and understory habitat. Impacts to these sensitive plant communities would be less than significant with mitigation. Additional detailed analysis and further discussion will be provided in the EIR.

c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, and drainages) or waters of the United States or California, as defined by § 404 of the federal Clean Water Act or California Fish & Game code § 1600, et seq. through direct removal, filling, hydrological interruption, or other means?



**Potentially Significant Impact.** No wetlands or prominent streams were observed during biological surveys of the Project Site; however, erosional drainages with possible connections to an off-site blue-line stream were observed on the north-facing slopes along the northern boundary of the Project Site. The southeast portion of the site will be subjected to significant grading to accommodate the residential building pads. The proposed detention basin located on the northern portion of the site will be designed to capture and slow the flow of stormwater runoff to ensure that no on-site or offsite flooding is caused by the Project. A jurisdictional delineation will be provided in the EIR to determine if there were federally (or state) protected wetlands or streams at the Project Site. Project impacts to federally (or state) protected wetlands and streams, if present, would be potentially significant, but mitigable. Additional detailed analysis and further discussion will be provided in the EIR.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?



**Less Than Significant Impact.** The Project would remove approximately 16 acres of undeveloped natural habitats within the Santa Monica – Sierra Madre Connection habitat linkage. Project fuel modification would also impact up to an additional 0.86 acres of undeveloped natural habitats within the linkage, depending on site-specific fuel modification requirements, which are subject to approval by the Los Angeles County Fire Department (LACoFD). Project grading and fuel modification would remove or disturb only a very small portion of the linkage when compared to the overall size of the linkage as well as the width of the linkage at the location of the Project Site. The width of the linkage at the location of the Project Site ranges from

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approximately 1.9 miles to over 5 miles, which significantly exceeds the minimum width of 1.2 miles imposed for all portions of the final linkage design, which was intended to ensure constriction points would not prevent movement of organisms through the linkage. Also, as the Project site is situated at the edge of existing contiguous urban development of the San Fernando Valley, where growth is planned, the Project would not significantly fragment natural habitats within the linkage, and the Project would not affect movement into or out of the focal points of the linkage, including the Santa Monica Mountains or Sierra Madre Mountains. For these reasons, development of the Project would not have a significant adverse effect on the value of the Santa Monica – Sierra Madre Connection habitat linkage for wildlife movement over the short or long-term, and grading and fuel clearance of undeveloped natural habitats within the linkage would be a less than significant impact. Additional discussion will be provided in the EIR.

e) Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)?

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**Potentially Significant Impact.** The total canopy area and associated Spheres of Influence (SIs) around the tree canopy of the woodlands is approximately 0.74 acres and 4.59 acres, respectively. Project development will significantly impact four oak woodlands and remain outside the oak woodland canopies associated with the remaining three. A total of 0.25 acre of significant impacts to oak woodland canopy would occur in which would require mitigation. Project impacts to oak woodlands could be mitigated to a less than significant level. Additional detailed analysis and further discussion will be provided in the EIR.

f) Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), and Sensitive Environmental Resource Areas (SERAs) (L.A. County Code, Title 22, Ch. 22.44)?

☒ ☐ ☐ ☐

**Potentially Significant Impact.** The Project is subject to the county's oak tree ordinance. As the Project implementation could impact oak trees, an oak woodland conservation management plan was prepared. The Project would comply with the county's oak tree ordinance and the mitigation based on that ordinance identified in the plan and as such the impacts would be substantially mitigated. The Project Site falls within the Rural Outdoor Lighting District and would comply with all regulations set forth by the Rural Outdoor Lighting District, including limitations on allowable light trespass, fully shielding outdoor lighting, and imposing maximum heights on fixtures. Project grading and fuel modification would not extend into the SEA. Therefore, the Project would not conflict with the Los Angeles County Significant Ecological Areas Ordinance. Nevertheless, additional detailed analysis and further discussion will be provided in the EIR.

g) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan?

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**No Impact.** There are no Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans that are applicable to the Project Site. The Project would have no impact with respect to conflicts with habitat conservation plans.

## 5. CULTURAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following cultural resources analysis is primarily based on the Phase I(b) Cultural Resource Assessment, prepared by Envicom Corporation, dated November 12, 2018 and included as **Appendix C**. The Phase I(b) expanded on the previous Phase I(a) Cultural Resource Assessment conducted in April 2017 by Envicom Corporation.

**Less Than Significant Impact.** The United States Geographical Survey (USGS) historic map database was reviewed as part of the Phase I(b) Cultural Resource Assessment (Phase I(b)). Sixteen historic USGS and other government maps were reviewed for a historic history of the Project property dating back to 1903. The database was negative for historic built environment resources with any development shown on the maps outside of the Project development area. There is no other development on the historic maps until the 1960s when roads and flood control start to show up on the Project Site. Based off of Google Earth images that go back to 1989, there are clear roads and flood control features on the property.

Due to the Project's historic cultural resource records search being negative for early 20<sup>th</sup> Century cultural resources within the Project development area, and due to the limited early historic development of the Project property region, the Phase I(b) considers the Project to not be sensitive for historic cultural resources. Therefore, the Project has a less than significant impact to historical resources.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**Potentially Significant Impact.** On February 27, 2017, Envicom requested a record search of the South Central Coastal Information Center (SCCIC) database for known cultural resources within the Project area and nearby region. The record search included the Project location, not including the open space set aside on the property, and a 0.5-mile study area, as shown in **Figure 5, Project Study Area** placed around the development area to provide a regional context. The findings resulted in one cultural resource within the development area and one cultural resource report. The one report from the record search had a negative finding for cultural resources. The cultural resource within the proposed Project development is CA-LAN-1223. CA-LAN-1223, first recorded in 1985, is located within the Project property and was identified through surface artifacts. The Phase I(b) surface survey and shovel test pit placement was performed after the Phase I(a) concluded that due to thick vegetation on the Project Site a more thorough study would need to occur. The Phase I(b) consisted of shovel test pits and surface surveys. During the surface survey, three prehistoric artifacts were located that matched with the site form artifacts, which described similar material.



**Figure 5, Project Study Area**

There was a total of 22 shovel test pits along four transects around the originally mapped location of CA-LAN-1223. Another area along the ridgeline saddle was tested with ten shovel test pits in a single transect as well. None of the shovel test pits were positive for prehistoric cultural resources. In addition, the Native American Heritage Commission (NAHC) was contacted on February 27, 2017, with a request to search their database for cultural resources within the Project Area of Direct Impact (ADI) and within the larger 0.5-mile study area. A response from the NAHC was received on March 3, 2017, which was negative for cultural resources within the Project Site.

The conclusion from the Phase I(b) was that the original site form was describing a scant scatter of prehistoric artifacts that included lithic material from stone tool manufacturing and from limited plant material processing. The 22 shovel test pits from the originally mapped location demonstrated that this material was not numerous, nor deep, and that associated prehistoric features were not present. The ten shovel test pits along the ridgeline did not find any prehistoric artifacts and it was concluded that there was no evidence of prehistoric occupation or use of the ridgeline saddle area.

Due to the number of shovel test pits, the lack of extensive surface artifacts, and the lack of prehistoric artifacts recovered from the shovel test pits, the Phase I(b) concluded that the potential was low for recovering additional prehistoric artifacts from the CA-LAN-1223 cultural resource. Overall, there was only a limited number of prehistoric artifacts found. Of the artifacts found, they were unexceptional with no artifacts indicating greater site complexity. For these reasons, the Phase I(b) recommends that CA-LAN-1223 is not a significant resource under the California Register eligibility criteria. Although CA-LAN-1223 was not determined to be significant, the record search was positive for cultural resources and indicated the development area was sensitive for prehistoric cultural resources. Additional detailed analysis and further discussion will be provided in the EIR.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ☒ ☐ ☐ ☐

**Potentially Significant Impact.** The site is above sandstone bedrock including part of the Monterrey Formation, which is known to be fossil-bearing. Through the surface observations of the exposed sandstone rock units, the Phase I(b) survey concluded that the area is sensitive for paleontological resources. These resources could be impacted during construction grading activities and would require monitoring during ground-moving activities. Additional detailed analysis and further discussion will be provided in the EIR.

d) Disturb any human remains, including those interred outside of dedicated cemeteries? ☐ ☐ ☒ ☐

**Less Than Significant Impact.** The proposed Project Site was surveyed in the Phase I(b) and was determined sensitive for cultural resources. There was no indication or evidence found of formal or informal burial of human remains. The cultural resource found on site was determined within the Phase I(b) to not be significant and did not include human remains. While this Project Site did not have any evidence indicating human remains, there was evidence of cultural resources on the Project Site and within the study area. Also, due to the Project activities which would involve grading, there is always potential for discovery of human remains during earthwork. State of California Health and Safety Code Section 7050.5 addresses findings of human remains. This code section states that in the event human remains are uncovered, no further

disturbance shall occur until the County Coroner has made a determination as to the origin and disposition of the remains pursuant to Public Resource Code (PRC) Section 5097.98. The Coroner must be notified of the find immediately, together with the City and the property owner. Therefore, the impact related to the disturbance of human remains would be less than significant.

## 6. ENERGY

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less Than Significant Impact.** As a matter of regulatory compliance, the Project would be required to comply with California Green building codes and Los Angeles County Green Building Standards in effect at the time of permit issuance. Energy efficient design features shown on the Project Architectural Plans would include sealing building openings, Energy Star rated appliances, and all walls, attics, and pipes insulated with proper insulation densities. In addition, the Project would incorporate design features including an electric vehicle (EV) charging station for each dwelling unit to promote sustainable modes of travel and rooftop solar panels on each unit to supplement electric generation. These energy efficient project design features would ensure the Project would not result in a wasteful, inefficient, or unnecessary consumption of energy resources.

The Project will comply with all applicable and relevant policies and codes and applicable energy efficiency measures. These include adherence to policies encouraging development in urban and suburban areas, encouraging development in proximity to major transportation stops to reduce automobile dependence and vehicle miles traveled and encouraging maximum amounts of energy conservation in new development and municipal operations. Energy efficiency and conservation will be implemented in the construction phase through the use of energy efficient equipment and sustainably sourced materials and recycling; and in the operations phases by incorporating the use of reclaimed water and renewable energy where feasible and would not result in wasteful, inefficient or unnecessary energy consumption. Therefore, the Project would have a less than significant impact due to wasteful, inefficient, or unnecessary consumption.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Less Than Significant Impact.** The proposed Project design, 25 single-family homes, represents a minimal amount of the County's energy demand and does not conflict with a state or local plan for renewable energy or energy efficiency. As a matter of regulatory compliance, the Project would be required to comply with the County Green Building Standards Code, Green Building Standards Code (CALGreen Code or CGBSC) of Title 24 of the California Code of Regulations, and the State of California Green Code, in effect at the time of Project approval. These standards require applicable projects to comply with energy saving building standards. CALGreen's mandatory measures establish a minimum for green construction practices. Project specific CGBSC compliance measures will be noted in the Project architectural plans. As stated above, the project design features include an EV charging station for each dwelling unit and rooftop solar panels on each unit which would ensure the Project would not result in a wasteful, inefficient, or unnecessary consumption of energy resources. As the Project would also comply with regulatory requirements and consist of energy efficient project design features, the Project would not conflict with or obstruct a state or local plan for

renewable energy or energy efficiency, and impacts would be less than significant. Given the Project incorporates the efficient energy consumption measures required by the County Green Building Standards Code and CALGreen and consists of energy efficient project design features, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.



## 7. GEOLOGY AND SOILS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known active fault trace? Refer to Division of Mines and Geology Special Publication 42.

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The following geology and soils analysis is primarily based on the Preliminary Geotechnical Report, prepared by Pacific Soils Engineering Inc., dated July 10, 2006, and included as **Appendix D**. A subsequent review of this document was conducted by G3Soilworks, Inc. on September 14, 2017 to assess the applicability of the previously approved reports and whether any changes have occurred to the Project Site since 2006. The 2017 review found the original report remained accurate and adequate and is included as **Appendix E**. Other geotechnical documentation includes the Response to Los Angeles County Department of Public Works Geotechnical Materials Division Geologic and Soils Engineering Review Sheets prepared by Pacific Soils Engineering Inc., dated February 14, 2007 and included as **Appendix F**. The Project will comply with the findings and recommendations of the Preliminary Geotechnical Report, which will inform the appropriate procedures for site prep, earthwork, grading, and structural elements of the Project.

**Less Than Significant Impact.** The Project Site is not located within any Earthquake Fault Zone or Alquist-Priolo Earthquake Fault Zone mapped by the Earthquake Zones of Required Investigation.<sup>10</sup> The study site is located within seismically active southern California, meaning moderate to strong ground motions resulting from future regional earthquakes could occur during the life of the Project. However, the Project would be required to incorporate seismic design elements of the Office of Statewide Health Planning and Development, California Building Code, and Uniform Building Code (UBC), and comply with the geotechnical engineer's recommendations for the Project. As such, impacts pertaining to earthquake fault zones would be less than significant.

ii) Strong seismic ground shaking?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Less Than Significant Impact.** As described above, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone and no active faults have been mapped on the Site. As the Site is located

<sup>10</sup> California Geologic Survey, Earthquake Zones of Required Investigation, Accessed on June 17, 2019 at: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.

within southern California, a seismically active region, there is potential for moderate to strong ground shaking. However, compliance with the geotechnical engineer's recommendations for the Project, existing policies, regulations and statutes would minimize risks to structures and residents on the Project Site. Therefore, impacts to seismic ground shaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction and lateral spreading? ☐ ☐ ☒ ☐

**Less Than Significant Impact.** Liquefaction occurs when seismic agitation of loose saturated and silty sands result in a build-up of pore water pressures and these pressures are sufficient to overcome overburden stresses. Fine sands and silts are potentially subject to liquefaction under seismic condition and such soils may behave like a liquid when shaken by an earthquake. In the case of lateral spreading, the ground may slide down very gentle slopes or toward stream banks riding on a buried, liquefied layer.<sup>11</sup> The Project Site is located within a Seismic Hazard Zone as mapped by the California Geological Survey and lies within a liquefaction zone.<sup>12</sup> However, liquefaction potential within the developed portions of the subject property is considered minimal due to the planned removal of loose, soft alluvial, colluvial and artificial fill material within the grading limits and the in-place density of the proposed compacted fill and bedrock materials. Additionally, compliance with the geotechnical engineer's recommendations for the Project, existing policies, regulations and statutes would minimize risks to structures and residents on the Project Site. Therefore, impacts to seismic-related ground failure would be less than significant.

iv) Landslides? ☐ ☐ ☒ ☐

**Less Than Significant Impact.** The Project Site is located within a Seismic Hazard Zone as mapped by the California Geological Survey and lies within a landslide zone.<sup>13</sup> Additionally, the Project Site is located within a hillside region. However, based on the stability analyses performed in the Preliminary Geotechnical Report of selected proposed cut, fill and natural slopes within the Project grading limits, the Site meet or exceeds the County of Los Angeles minimum requirements for both static and pseudostatic conditions. Additionally, compliance with the geotechnical engineer's recommendations for the Project, existing policies, regulations and statutes would minimize risks to structures and residents on the Project Site. Therefore, impacts related to landslides would be less than significant.

b) Result in substantial soil erosion or the loss of topsoil? ☐ ☐ ☒ ☐

**Less Than Significant Impact.** Development of the Project has the potential to result in the erosion of soils during earthwork and construction activities. Erosion and/or the loss of topsoil during construction is addressed through implementation of erosion controls and best management practices (BMPs) to meet standard National Pollutant Discharge Elimination System (NPDES) requirements for storm water quality. The NPDES Construction General Permit is required for projects that disturb an area of at least one acre, and compliance with its requirements is typically achieved through preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which would minimize erosion and alleviate the potential for debris and pollutants to flow off-site. Required compliance with the NPDES through SWPPP BMPs would

<sup>11</sup> USGS, Earthquake Glossary, Lateral Spread or Flow, Accessed on June 18, 2019 at: <https://earthquake.usgs.gov/learn/glossary/?term=lateral%20spread%20or%20flow>.

<sup>12</sup> California Geologic Survey, Earthquake Zones of Required Investigation, Accessed on June 17, 2019 at: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.

<sup>13</sup> Ibid.

assure that the degradation of water quality during construction would be avoided. In addition, the Project would be required to obtain a grading permit, for which the Department of Public Works would require compliance with the grading best practices manual. Therefore, Project impacts associated with soil erosion or the loss of topsoil during construction would be less than significant.

During operation, the Project would also comply with the County's Low Impact Development (LID) Standards,<sup>14</sup> which manage stormwater runoff to reduce erosion, as well as with the Regional Water Quality Control Board's (RWQCB's) Municipal Separate Storm Sewer System (MS4) Permit CAS004001.<sup>15</sup> Therefore, the Project would have a less than significant impact in regard to substantial erosion or the loss of topsoil during operations.

**c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?**

☐☐☒☐

**Less Than Significant Impact.** According to the Preliminary Geotechnical Report, naturally occurring weathering products of the surficial units and bedrock overlie nearly the entire site except where disturbed and removed by previous grading activity. Typically consisting of porous, loose, silty to sandy clay which fragments derived from the underlying parent rock, these soils range in thickness from approximately ½ to 3 feet. Based on the stability analyses, the Site meet or exceeds the County of Los Angeles minimum requirements for both static and pseudostatic soil conditions. The Project will comply with the findings and recommendations of the Preliminary Geotechnical Report, which will inform the appropriate procedures for site prep, earthwork, grading, and structural elements of the Project. Additionally, compliance with existing policies, regulations and statutes would minimize risks to structures and residents on the Project Site. Therefore, impacts related to unstable soils would be less than significant.

**d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

☐☐☒☐

**Less Than Significant Impact.** Expansive soils are soils that shrink and swell in response to changes in moisture content and potentially causing damage to structures. The local geology at the Site is characterized by Miocene sedimentary rocks including the Modelo and Topanga Formations. Based upon test results conducted on selected samples, the rock from the Modelo Formation and alluvial materials derived from it are anticipated to possess expansive potential ranging from very low to high when tested in accordance with UBC Standard 18-2. Topanga Formation siltstone and claystone, if encountered, could have expansion potential ranging from medium to high. Due to the variability in expansion potential of the onsite bedrock, the soils engineer/engineering geologist should be consulted with regard to exposed conditions. Overall, the Project would comply with the County building code and would be required to follow recommendations from a geotechnical engineer or equivalent. Design recommendations to address expansive soil include, but are not limited to, the utilization of post-tensioned slabs, mat-slabs or other foundation systems to account for site

<sup>14</sup> Los Angeles County, Chapter 12.84 – Low Impact Development Standards, Accessed on June 18, 2019 at:

[https://library.municode.com/ca/los\\_angeles\\_county/codes/code\\_of\\_ordinances?nodeId=TTT12ENPR\\_CH12.84LOIMDEST](https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TTT12ENPR_CH12.84LOIMDEST).

<sup>15</sup> California RWQCB, Los Angeles Region, Order No R4-201200175, NPDES Permit No. CAS004001, Waste Discharge Requirements For MS4 Discharges Within the Coastal Watersheds of Los Angeles County, Except Those Discharges Originating From the City of Long Beach MS4.

specific geotechnical conditions, deepened footing and setbacks, and backfill utility trenches with lean concrete to minimize moisture penetration. Therefore, the Project would have a less than significant impact in regard to risks associated with expansive soils.

e) Have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater?

☐☐☐☒

**No Impact.** The Project will be served by the Las Virgenes Municipal Water District for Potable water. Los Angeles County Public Works infrastructure<sup>16</sup> will convey the wastewater from the 25 residential homes to the point of interconnection with the City of Los Angeles sewer line at Randiwood Lane to the east. No septic tanks or alternative wastewater disposal methods are proposed. As such, there are no impacts related to onsite wastewater treatment systems.

f) Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch. 22.104)?

☐☐☒☐

**Less Than Significant Impact.** Hillside Management Areas (HMAs) are defined as areas with 25% or greater natural slopes. As the application for a vesting tentative tract map was deemed complete prior to January 8, 2008, the Project is analyzed according to the local regulations in place at the time, including the General Plan 1980 and the 1982 Hillside Management and Significant Ecological Areas Ordinance, regulated through Section 22.56.215 of Title 22, Los Angeles County Zoning Code. The Project is zoning compliant and therefore would not conflict with the goals and policies related to Hillside Management Area Ordinance, as further analyzed in Section 11, Land Use and Planning. The Project impacts are less than significant.

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<sup>16</sup> County of Los Angeles, Department of Public Works, Inter-departmental Correspondence regarding Draft Initial Study, Tract No. 52652-West Hills Crest Residential Project, County Unincorporated Community of West Hills, February 24, 2020.

## 8. GREENHOUSE GAS EMISSIONS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>Would the project:</b>				
<b>a) Generate greenhouse gas (GHGs) emissions, either directly or indirectly, that may have a significant impact on the environment?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project-specific analysis pertaining to greenhouse gas emissions is predominately based on the Project's Air Quality Impact Analysis, prepared by Envicom Corporation, dated March 14, 2017, and included as Appendix B.

**Less Than Significant Impact.** Greenhouse gases (GHGs) can contribute to an increase in the temperature of the earth's atmosphere by absorbing infrared radiation transmitted by the sun, thereby trapping and retaining heat within the atmosphere. The principal GHGs are carbon dioxide, methane, nitrous oxide, ozone, and water vapor. The CEQA Guidelines define the following as GHGs: carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs).<sup>17</sup> Each GHG differs in its mass and ability to trap heat within the atmosphere based on factors such as capacity to directly absorb radiation, length of time in the atmosphere, and chemical transformations that create new GHGs. Because the warming potential of each GHG differs, GHG emissions are typically expressed in terms of carbon dioxide equivalents (CO<sub>2</sub>e), providing a common expression for the combined volume and warming potential of the GHGs generated by an emitter. Total GHG emissions from individual sources are generally reported in metric tons (MT) and expressed as metric tons of carbon dioxide equivalents (MTCO<sub>2</sub>e).

During Project construction, the CalEEMod model estimates that the construction activities would generate a total of 780 MT CO<sub>2</sub>e emissions. SCAQMD GHG emissions evaluation guidance is to amortize construction emissions over a 30-year lifetime, which results in a Project amortized annual emissions of approximately 26 MT CO<sub>2</sub>e emissions.

There are currently no locally adopted significance thresholds for GHG emissions. The SCAQMD CEQA Greenhouse Gas Significance Threshold working group recommended a threshold of 3,000 MT MTCO<sub>2</sub>e per year for non-industrial land use projects for use where SCAQMD is the lead agency<sup>18</sup> As there were no other locally adopted thresholds for other lead agencies, recommended tiered thresholds from the SCAQMD CEQA Greenhouse Gas Significance Threshold working group are used as a point of comparison. The purpose of quantifying the Project's GHG emissions is to satisfy State CEQA Guidelines Section 15064.4(a), which calls for a good faith effort to describe and calculate emissions.

<sup>17</sup> California Code of Regulations, Section 15364.5 Greenhouse Gas, Article 20, Definitions.

<sup>18</sup> South Coast Air Quality Management District, Greenhouse Gases (GHG), CEQA Significance Thresholds, Accessed on June 17, 2019 at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2>.



During Project operations, the CalEEMod model estimates that the Project's annual operational GHG emissions from a combination of area sources, energy use, water use, and waste disposal would be 585.7 MT CO<sub>2</sub>e. With the addition of the amortized construction GHG emissions discussed above, the Project would result in annual emissions of approximately 611.7 MT CO<sub>2</sub>e, which would not exceed the draft 3,000 MT CO<sub>2</sub>e per year screening criteria for non-industrial projects, and therefore the Project's operational GHG emissions impact would be less than significant.

**b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

☐☐☒☐

**Less Than Significant Impact.** The Unincorporated Los Angeles County Community Climate Action Plan (CCAP) 2020's complies with CEQA by quantifying all primary sectors of GHG emissions within the unincorporated areas for years 2010 and 2020; including a reduction target of at least 11 percent below 2010 levels, which is consistent with the recommendations in the AB 32 Scoping Plan for municipalities to support the overall AB 32 reduction targets; analyzing community emissions for the unincorporated areas as a whole and including predicted growth expected by 2020; including specific measures to achieve the overall reduction target; including periodic monitoring of plan progress; and submitting the CCAP to be adopted in a public process following compliance with CEQA. There are 26 local actions included in the CCAP. The local actions are grouped into five strategy areas: green building and energy; land use and transportation; water conservation and wastewater; waste reduction, reuse, and recycling; and land conservation and tree planting.<sup>19</sup>

The majority of emission reductions will be achieved by statewide initiatives to improve vehicle engine efficiency and reduce the carbon intensity of transportation fuels. The State's Renewable Portfolio Standard will increase the amount of electricity generated by renewable resources, reducing GHG emissions from electricity consumption. Other statewide actions include Pavley and Low Carbon Fuel Standards for On-Road Transportation and the California Cap and Trade Program. The Project would not conflict with these applicable statewide initiatives. Additionally, the Project would comply with Title 24 standards for Building Energy Efficiency and appliances purchased for the Project would be consistent with energy efficient standards. The Project would incorporate project-specific design features including an electric vehicle (EV) charging station for each dwelling unit to promote sustainable modes of travel and rooftop solar panels on each unit to supplement electric generation. These energy efficient project design features would ensure the project would not result in unnecessary GHG emissions. As such, the Project would not conflict with the CCAP, regarding GHG reduction strategies. Therefore, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs per SCAQMD's recommended thresholds, and impacts would be less than significant.

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<sup>19</sup> County of Los Angeles, Department of Regional Planning, Final Unincorporated Los Angeles County Community Climate Action Plan 2020, August 2015, Accessed on June 17, 2019 at: [http://planning.lacounty.gov/assets/upl/project/ccap\\_final-august2015.pdf](http://planning.lacounty.gov/assets/upl/project/ccap_final-august2015.pdf).

## 9. HAZARDS AND HAZARDOUS MATERIALS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The following hazards analysis is primarily based on the Phase I Environmental Site Assessment Report (Phase I ESA), prepared by G3SoilWorks on November 3, 2015 and included as **Appendix G**. Due to the age of this report, a new Phase I ESA will be prepared for the Project and any applicable new data will be incorporated in the EIR discussion.

**Potentially Significant Impact.** Implementation of the Proposed Project may involve an increase in the transport, use, and disposal of hazardous materials associated with construction and construction equipment such as fuels, lubricants, solvents and paints. However, any future development and use of land, as designated under the proposed Project, would be required to comply with applicable federal, state and local regulations related to hazardous materials. Required compliance with these regulations guiding the storage, use and containment are expected to ensure impacts related to transport, use and disposal of hazardous materials would be less than significant. Nevertheless, additional detailed analysis and further discussion will be provided in the EIR.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**Potentially Significant Impact.** Implementation of the Project may pose a hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment such as those identified previously. A recognized environmental condition (REC) is “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions.”<sup>20</sup> Based on the Phase I ESA, RECs on the property include:

- A total of fifteen oil wells, five observed in Site Reconnaissance and ten reported in the Department of Oil, Gas, and Geothermal Resources (DOGGR) files.<sup>21</sup> Of those reported in the DOGGR files, seven are identified as plugged, two as idle and one as a dry hole.<sup>22</sup> The status of the wells identified in the field is unknown.

<sup>20</sup> ASTM, E1527-13, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

<sup>21</sup> None of the wells identified by DOGGR were located during the Site Reconnaissance.

<sup>22</sup> DOGGR, Well Finder, Accessed on September 25, 2019 at: <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.66471/34.19312/17>.

- The two abandoned storage tanks located on site—one corrugated metal tank observed on a slope near the center of the Site and a steel storage tank was observed near the exposed oil wells in the north portion of the site.

DOGGR identifies the Project Site as located within the Canoga Park oil/gas field.<sup>23</sup> The Phase I ESA recommends that the DOGGR be notified with a request to conduct a file review and provide their requirements for the disposition of each well based on the proposed land use and implementing the above DOGGR requirements/recommendations and that the immediate vicinity of the wells be assessed and residual impacts from the drilling and use of the wells, if any, be remediated. Based on preliminary discussions with DOGGR, two of the wells located within the Project boundary may be leaking oil and/or gas and clean up orders have been issued to the prior well operator, not the Project. If the prior operator cannot be identified then DOGGR will assume the responsibility for proper well closure. That activity will be coordinated with the County and the Project development team. Going forward the Project would be required to comply with all statutory and regulatory provisions pertaining to working around idle wells. The statutory provisions for idle wells are found in Public Resources Code Sections 3206, 3206.1, 3206.3, 3206.5, including requirements to either file an annual idle well fee or file an Idle Well Management Plan (IWMP) for the management and elimination of the operator's long-term idle wells.<sup>24</sup> The regulatory provisions are found in the California Code of Regulations, Title 14, Division 2, Chapter 4, Subchapters 1 and 2, Section 1723 and ensure abandoned wells are properly decommissioned.<sup>25</sup> There is ongoing consultation with DOGGR to develop an appropriate approach to address the historic on-site wells. In addition, the EIR will further address on-site wells and potential methane gas emissions.

Impacts may include drilling mud pits and oil or fuel impacted soil. In addition, the Phase I ESA recommends the two storage tanks and on-site concrete debris should be removed from the site for general environmental and geotechnical improvements. Preparation of a comprehensive Stormwater Pollution and Prevention Plan (SWPPP) is a regulatory requirement that will be implemented to prevent further on-site erosion of soil and slope failure. Compliance with the current Phase I recommendations and all applicable federal, state and local regulations would ensure impacts related to significant hazards to the public would be less than significant. However, due to the age of the current Phase I, a new Phase I Environmental Site Assessment will be completed for the Project and any applicable information found as a result will be incorporated in the additional detailed analysis and further discussion to be provided in the EIR.

**c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?**



**Potentially Significant Impact.** Sensitive land uses include residential zones, schools, hospitals or other similar residential, educational, or health care facility.<sup>26</sup> There are no schools located within one-quarter mile

<sup>23</sup> DOGGR, Well Finder, Accessed on December 6, 2019 at: <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.66347/34.19308/16>.

<sup>24</sup> Department of Conservation, Division of Oil, Gas and Geothermal Resources, For Operators-Idle Well Program, Accessed on October 3, 2019 at: [https://www.conservation.ca.gov/dog/idle\\_well/Pages/idle-well-operators.aspx#iwmp](https://www.conservation.ca.gov/dog/idle_well/Pages/idle-well-operators.aspx#iwmp).

<sup>25</sup> California Department of Conservation, Division of Oil, Gas and Geothermal Resources, California Statutes and Regulations for the Division of Oil, Gas and Geothermal Resources, January 2018, Accessed on June 25, 2019 at: <https://www.conservation.ca.gov/index/Documents/DOGGR%20Statutes%202018%20%20updated%204-4.pdf>.

<sup>26</sup> Los Angeles County Department of Regional Planning, Title 22 (Planning and Zoning), Title 22.140.00, Accessed on June 18, 2019 at: <http://file.lacounty.gov/SDSInter/bos/supdocs/97129.pdf>.

of the proposed Project. The closest sensitive land uses that could potentially be subject to hazardous emissions or acutely hazardous materials, substances, or waste within one-quarter mile of the Project would be existing residences adjacent to the Project Site's eastern boundary. Based on preliminary discussions with DOGGR the Project Site is located within the Canoga Park oil/gas field and two of the wells located within the Project boundary may be leaking oil and/or gas and clean up orders have been issued to the prior well operator, not the Project. The 2015 Phase I ESA did not identify these existing hazards. As such, additional detailed research and analysis will be conducted and further discussion will be provided in the EIR.

**d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

☐☐☐☒

**No Impact.** A search of the California Environmental Protection Agency's (CalEPA's) Cortese List Data Resources databases<sup>27</sup> showed that the Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The search involved the following records:

- Department of Toxic Substances Control's (DTSC's) Envirostor Hazardous Waste and Substances Site List;
- State Water Resources Control Board's (SWRCB's) GeoTracker database (for Leaking Underground Storage Tank (LUST) sites, Department of Defense sites, and Cleanup Program sites, as well as GeoTracker irrigated lands, oil and gas production, operating permitted USTs, and Land Disposal sites); and,
- CalEPA's list of solid waste disposal sites; and the SWRCB's list of Cease and Desist Orders and Cleanup and Abatement Orders.
- Information required from the DTSC under Government Code Section 65962.5(a).

The Project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment. Therefore, the Project would have no impact associated with being located on a site that is included on a list of hazardous materials sites.

**e) For 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, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

☐☐☐☒

**No Impact.** The Project is not located within 2 miles of a public airport. The closest airport to the Project site is the Van Nuys Airport, located approximately 11 driving miles east of the Project site. The airport is owned and operated by the County of Los Angeles. The County of Los Angeles Airport Land Use Commission (ALUC) oversees implementation of the Los Angeles County Airport Land Use Plan (LUP) for each of its airports, including the Van Nuys Airport. The Project site is not located within the runway

<sup>27</sup> California Environmental Protection Agency, Cortese List Data Resources, Accessed on June 17, 2019 at: <https://calepa.ca.gov/sitecleanup/corteselist/>.

protection zone or airport influence area of the Van Nuys Airport designated by the LUP.<sup>28</sup> Therefore, the Project would result in no impact associated with airport safety hazards.

f) Substantially impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?



**Potentially Significant Impact.** The Project site is not located directly along an emergency response plan route. However, Valley Circle Blvd, a designated disaster route, is located approximately 0.5 miles east of the Project site.<sup>29</sup> The Los Angeles County Fire Department (LACoFD) provides fire, safety and emergency medical services to the Project area and the Los Angeles Sheriff Department (LASD) provides law enforcement services. Although response times are not an effect under CEQA, coordination among the various County departments is necessary to ensure adequate emergency response. LACoFD has already reviewed the Project and has determined that the Project would not create a life safety concern, as mentioned in a letter that can be found in **Appendix H**, from LACoFD dated March 13, 2008. It is expected that compliance with applicable regulations and implementation of the required policies would ensure the risk of impaired implementation or physical interference with an adopted emergency response plan or emergency evacuation plan is less than significant. Nevertheless, additional detailed analysis and further discussion will be provided in the EIR.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located:

i) within a high fire hazard area with inadequate access?



**Potentially Significant Impact.** According to the County of Los Angeles General Plan (Figure 12.5, Fire Hazard Severity Zones Policy Map), the Project is located within a Very High Fire Hazard Severity Zone.<sup>30</sup> The State Board of Forestry and the California Department of Forestry and Fire Protection (CalFire) have provided comprehensive guidance for wildland fire protection in California. The Fire Plan Unit of LACoFD is in charge of implementing the California Fire Plan in Los Angeles County. The Strategic Fire Plan prepared by LACoFD identifies and prioritizes pre- and post-fire management strategies and tactics to reduce loss of life, property, and natural resources.<sup>31</sup> A letter from the LACoFD dated March 13, 2008, approved the Project with minor conditions and determined that “the proposed improvements will not create a life safety concern and will in turn provide an improved buffer for the existing residential community.”

The Project would also comply with the Conceptual Fire Protection Plan for West Hills Community, submitted June 24, 2016 and revised January 21, 2019, and included as **Appendix I**. The Conceptual Project Fire Protection Plan would be reviewed and approved by the LACoFD and ensure the Project’s

<sup>28</sup> Los Angeles County Department of Regional Planning for the Los Angeles County Airport Land Use Commission. 2004. Los Angeles County Airport Land Use Plan. Revised December 1.

<sup>29</sup> Los Angeles County Department of Regional Planning, General Plan Plate 8: Critical Facilities and Lifeline Systems, January 1990.

<sup>30</sup> Los Angeles County Department of Regional Planning, General Plan Figure 12.5: Fire Hazard Severity Zones Policy Map, May 2014.

<sup>31</sup> Los Angeles County Fire Department, 2017-2021 Strategic Plan, Accessed on June 18, 2019 at: <https://www.fire.lacounty.gov/wp-content/uploads/2018/10/LACoFD-Strategic-Plan-2017-2021.pdf>.



compliance with all applicable rules and regulations of the LACoFD including roads, fire flow, ignition resistant building construction and vegetative fuel modification. In addition, the Project would include concrete block walled closets within the first floor of every residence to provide fire shelter in case of an emergency. With these Project design features, and as the Project would comply with all applicable fire and safety codes and standards of the LACFD, including the Fuel Modification Plan, the Project is expected to result in a less than significant impact related to fires. Nevertheless, additional detailed analysis and further discussion of this topic will be provided in the EIR.

ii) within an area with inadequate water and pressure to meet fire flow standards? ☐ ☐ ☒ ☐

**Less Than Significant Impact.** In October 2006, the Las Virgenes Municipal Water District (LVMWD) completed a Preliminary Water System Design Report for the Project Site (Tract 52652). The findings from this report identified that the Project Site was originally to be Phase II of the currently existing development adjacent to the east (Tract 23762) that was Phase I, constructed in 1965. Phase I consists of 175 single-family residences. The second phase (Project Site), which consisted of 30 single-family residences, was not constructed largely because a pump station and water storage tank was required to serve the proposed higher elevation residences as well as 25 of the higher parcels in Phase I to the east across Randiwood Lane. The cost for this new infrastructure would have been borne by the developer. Occasionally there are low pressure complaints from residents in the existing development to the east, and in response LVMWD prepared Report No. 2228.00 which concluded that conditions of service met district rules, but that service pressures dipped as low as 37 psi at some residences and that is less than the District standard minimum service pressure of 43 psi. A new pressure zone is required to serve the Proposed Project Site and the higher elevation residences in the existing development. This system has been planned since the 1960s as part of the original two-phase development. To serve the Project and bring pressures to District standard for existing higher elevation residences to the east, a water storage tank and pump station will be required in accordance with the District policy that fire flow should not be dependent on pumping. Construction of the Project will bring daily residential pressures to the District standard minimum pressure of 43 psi for existing residences, as well as provide critical water storage capacity to combat fires for the larger area. This would be an improvement over the current condition and therefore the proposed Project impacts would be less than significant. Nevertheless, additional detailed analysis and further discussion will be provided in the EIR.

iii) within proximity to land uses that have the potential for dangerous fire hazard? ☒ ☐ ☐ ☐

**Potentially Significant Impact.** The Project site is located in an undeveloped area characterized by moderate to steep hillsides west of Randiwood Lane at the western edge of the San Fernando Valley adjacent to the Ventura County line. It is bordered on the east entirely by single-family residential development across Randiwood Lane, on the north by El Escorpion Park, on the south by Knapp Ranch Park West and a Los Angeles City Department of Water and Power facility including two large water tanks. All of these land uses are located in a VHFHSZ. The land uses surrounding the Project site are subject to wildfire hazards given their proximity to open space. Five fires have burned the site or portions of the site since 1967. The Devonshire – Parker Fire burned nearly the entire site except for a small portion of its eastern end in October 1967. The Clampitt Fire burned the entire site in September 1970, and the Dayton Canyon Fire burned the approximate western two-thirds of the site in October 1982. The Topanga Fire of September 2005, which burned nearly the entire site leaving only the eastern margin of

the property intact. The last fire to affect the site was the Woolsey fire, which burned nearly the entire site in November 2018. Since the Project would be subject to the review and approval of the LACFD and would be required to implement an approved Fuel Modification Plan, it is expected the Project would have a less than significant impact related to its proximity to land uses that have the potential for dangerous fire hazards. Nevertheless, additional detailed analysis and further discussion will be provided in the EIR.

- h) Does the proposed use constitute a potentially dangerous fire hazard? ☒ ☐ ☐ ☐

**Potentially Significant Impact.** The Project site is currently undeveloped, and located in a VHFHSZ. The Project would be required to comply with all applicable fire and safety codes and standards of the LACFD, including implementation of the approved Fuel Modification Plan. Therefore, impacts are expected to be less than significant. Nevertheless, additional detailed analysis and further discussion of fire flow will be provided in the EIR.

## 10. HYDROLOGY AND WATER QUALITY

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following hydrology analysis is based on the approved Drainage Concept/Standard Urban Storm Water Mitigation Plan (SUSMP) prepared by S.E.C. Civil Engineers, Inc. dated June 21, 2007.

**Potentially Significant Impact.** The Project will require significant grading on the southeast portion of the Project Site during construction and would implement best management practices (BMPs) to meet standard NPDES requirements for storm water quality. The NPDES Construction General Permit is required for projects that disturb an area of at least one acre, and compliance with its requirements is typically achieved through preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which would minimize erosion and alleviate the potential for degrading surface or ground water quality. Required compliance with the NPDES through SWPPP BMPs would assure that the degradation of water quality during construction would be avoided. In addition, the Project would be required to obtain a grading permit, for which the Department of Public Works would require compliance with the grading best practices manual.

During operations, the Project would comply with the approved Drainage Concept/SUSMP, and the post-project flows would not exceed or be substantially greater than pre-project flows. No other uses associated with the Project would violate water quality standards or waste discharge requirements, and the Project would comply with applicable Federal, State and local standards and requirements. As such, the Project would have a less than significant impact in regard to water quality standards or waste discharge requirements. Nevertheless, additional detailed analysis and discussion will be provided in the EIR.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**Potentially Significant Impact.** According to the Preliminary Geotechnical Report included as **Appendix D**, groundwater was not encountered in the main canyon area or east canyon during boring tests. No surface water seeps were noted during the field investigation. As such, excavations are not expected to encounter groundwater.

The Project will be served by the Las Virgenes Municipal Water District (LVMWD) for potable water supply and the Project does not proposed groundwater extraction. No wells will be developed and the Project is a low-density residential subdivision with mostly pervious surfaces to be landscaped and with approximately 35% of the total site acreage to remain as open space. The Project would be required to comply with all applicable

Federal, State and local standards and requirements. Therefore, the Project would have a less than significant impact to the groundwater supplies. Nevertheless, additional detailed analysis and discussion will be provided in the EIR.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

(i) Result in substantial erosion or siltation on- or off-site?



**Potentially Significant Impact.** No prominent streams or rivers were observed during surveys of the Project Site, however, erosional drainages with possible connections to an off-site blue-line stream were observed on the north-facing slopes along the northern boundary of the Project Site. Existing drainage conditions at the Project site consist of two distinct drainage areas, including the southern area, where stormwater sheet flows towards Kittridge Street and continues to flow east along the gutter towards existing catch basins. The northern site area flows through two major canyons and a small canyon that eventually merge, and continues to flow north into Bell Creek, an existing natural water course and a tributary to the Los Angeles River, which runs through Bell Canyon Park.

As stated in the approved Drainage Concept/SUSMP Report, the proposed Project would not significantly alter the drainage pattern of the Project site. For the proposed Project, surface water from the southern portion of the site would be picked up by two proposed side opening catch basins and discharge would be conveyed through a proposed storm drain pipe, which would join the existing storm drain system at the intersection of Kittridge Street and Vicki View Drive. Additional surface waters that are not captured by catch basins would sheet flow along Kittridge Street, as in existing conditions. Surface waters would be conveyed to the proposed detention basin located on the northern portion of the site to reduce the velocity and volume of the flows, which outlets into Bell Creek in Bell Canyon Park. A large portion of the site will remain as open space and surface flows would be unaffected on this portion of the property.

As the site will be subjected to significant grading to accommodate the residential building pads, compliance with federal, state and local regulations and the implementation and maintenance of appropriate BMPs will reduce the risks of substantial erosion or siltation on or off-site to a less than significant level and compliance with the approved Drainage Concept/SUSMP would ensure the post-project flows would not exceed the pre-project flows. Therefore, impacts to erosion or siltation would be less than significant. Nevertheless, additional detailed analysis and discussion will be provided in the EIR.

(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?



**Potentially Significant Impact.** The Project is not located in a designated flood zone.<sup>32</sup> Elevations on the site range from approximately 1,250 to 1,380 feet above mean sea level (msl). The southeast portion of the site will be subjected to significant grading to accommodate the residential building pads. As stated previously,

<sup>32</sup> Los Angeles County, Department of Public Works, Flood Zone Determination Website, Accessed on June 18, 2019 at: <https://pw.lacounty.gov/floodzone/>.

the proposed detention basin located on the northern portion of the site will be designed to capture and slow the flow of stormwater runoff to ensure that no on-site or offsite flooding is caused by the Project. As such, the post-project flows would not exceed the pre-project flows. Compliance with federal, state and local design standards and regulations and the implementation and maintenance of appropriate BMPs will mitigate the risks of flooding both onsite and offsite to a less than significant level. Nevertheless, additional detailed analysis and discussion will be provided in the EIR.

**(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**



**Potentially Significant Impact.** As discussed above, the proposed Project would not result in a significant increase in site runoff as it would not alter existing drainage patterns or substantially increase the volume or velocity of runoff. As stated in above, the proposed Project would not significantly alter the drainage pattern of the Project site. The stormwater infrastructure would primarily discharge into the proposed detention basin on the northern site and discharge into a proposed storm drain pipe to connect with existing infrastructure on the southern portion of the site. Some additional minor surface runoff may also flow into the existing municipal stormwater system provided by the LACFCD and implementing BMPs would control runoff. The proposed residential developments would comply with the approved Drainage Concept/SUSMP Report and the proposed Project would not significantly alter the drainage pattern of the Project site. In addition, the Project would adhere to the applicable federal, state and local design standards and regulations, and compliance will be reflected in the site design which will be subject to approval by the County of Los Angeles prior to site development. The integration of applicable design features mandated by existing regulations would ensure that site runoff would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, the post-project flows would not exceed or be substantially greater than pre-project flows and impacts would be less than significant. Nevertheless, additional detailed analysis and discussion will be provided in the EIR.

**(iv) Impede or redirect flood flows?**



**Potentially Significant Impact.** The Project is located near the top of a ridgeline in the west San Fernando Valley. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), the Project site falls within Zone D, an area which flood hazards are undetermined, but possible<sup>33</sup> and according to the 1980 General Plan Safety Element, the Project site is not located within a 100- or 500- year flood plain.<sup>34</sup> The site development footprint will be subjected to considerable grading and impervious surfaces will be installed. Construction will not alter the course of a stream or river. Approximately 46% of the site will remain undeveloped open space and the large low-density residential lots will be landscaped maintaining a high percentage of pervious surface. The Project will be designed in accordance with all applicable regulations and engineering standard practices to ensure that floods flows are captured, controlled, treated and conveyed to the existing stormwater system. As such, the Project would not impede or substantially redirect flood flows. The development of this low-density residential

<sup>33</sup> FEMA, National Flood Hazard Layer (NFHL) Viewer, Accessed on September 25, 2019 at: <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-118.67013422020113,34.187274660763634,-118.65477052696343,34.19614914488295>.

<sup>34</sup> Los Angeles County Department of Regional Planning, General Plan Plate 6: Flood and Inundation Hazards, January 1990.



Project will have a less than significant impact on the site and adjacent properties. Nevertheless, additional detailed analysis and discussion will be provided in the EIR.

**d) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)?**

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**Potentially Significant Impact.** As the application for a vesting tentative tract map was deemed complete prior to January 8, 2008, the Project is analyzed according to the local regulations in place at the time, including the General Plan 1980, 2002 SUSMP Manual and 2004 Design Manual, which outlined BMPs to be incorporated into future project design plans. The Project will comply with all applicable regulations including the applicable portions of the County of Los Angeles Grading Code, NPDES compliance, and Municipal Separate Storm Sewer System (MS4) Permit in compliance with NPDES requirements for stormwater and non-stormwater discharges. The proposed residential developments would also comply with the previously approved Drainage Concept/SUSMP Report. As such, impacts are less than significant. Nevertheless, additional detailed analysis and discussion will be provided in the EIR.

**e) Use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?**

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**No Impact.** The Project will not use onsite wastewater treatment systems. The domestic wastewater generated on site will be directed into the existing sanitary sewer system that will be extended from Randiwood Lane into the development to serve the new residences. As such, there will be no impact related to use of onsite wastewater treatment systems.

**f) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

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**No Impact.** The Project Site elevation is approximately 1,250 to 1,380 feet above mean sea level (msl) and is near the top of a ridgeline in the far western end of the San Fernando Valley approximately 11 miles north of the Pacific Ocean. As stated above, according to the FEMA FIRM, the Project site falls within Zone D, an area which flood hazards are undetermined, but possible. According to the 1980 General Plan Safety Element, the Project site is not located within a 100- or 500- year flood plain and the Project would not impede or substantially redirect flood flows. As such, the Project would have no impacts to flood hazards. A tsunami is a great sea wave, or tidal wave, typically produced by an undersea earthquake. According to the Department of Conservation, the Project site is not located within a Tsunami Inundation Area.<sup>35</sup> The Project would have no impact related to tsunamis. Additionally, there are no large landlocked bodies of water near the Project site and thus the Project site is not susceptible to inundation by a seiche, which is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. The Project would have no impact related to seiche.

<sup>35</sup> Department of Conservation, Los Angeles County Tsunami Inundation Maps, Accessed on September 25, 2019 at: <https://www.conservation.ca.gov/cgs/tsunami/maps/Los-Angeles#findoutmore>.

g) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?



**Potentially Significant Impact.** As discussed previously, the Project is a low density residential development on large lots with mostly pervious surfaces to be landscaped and with Lot 27, at approximately 46% of the total site acreage, to remain as open space contiguous with the 5,600 acre Upper Las Virgenes Canyon Open Space Preserve, the 82-acre Knapp Ranch Park adjacent to the south and Bell Canyon Park to the north. The minimal increase in impervious structures for this residential development, including approximately 3.41 acres for building pads and driveways and approximately 2.14 acres for roads, will not conflict or obstruct the implementation of a water quality control plan or sustainable groundwater management plan and therefore the impacts of the proposed development will be less than significant. Nevertheless, additional detailed analysis will be provided in the EIR.

## 11. LAND USE AND PLANNING

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**No Impact.** The Project is an approximately 58-acre property located in an unincorporated area of Los Angeles County. The Project Site is located in an undeveloped area west of Randiwood Lane at the western edge of the San Fernando Valley adjacent to the Ventura County line. It is bordered on the east entirely by single-family residential development across Randiwood Lane, on the north by El Escorpion Park, on the south by Knapp Ranch Park West and a Los Angeles City Department of Water and Power facility including two large water tanks, and on the west by the 5,477-acre Upper Las Virgenes Canyon Open Space Preserve, formerly a part of Ahmanson Ranch. The proposed Project would extend the existing single-family uses approximately 0.5 miles westward. The northern and western areas of the Project site that adjoin El Scorpion Park and the Upper Las Virgenes Canyon Open Space Preserve would largely be retained as open space. Therefore, the Project would not divide an established community.

b) Cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Less Than Significant Impact.** The Project Site is located within an unincorporated area of the County of Los Angeles and as such, the proposed Project is subject to the policies of the Los Angeles County General Plan. The subdivision application was filed in 2004, prior to adoption of 2035 Los Angeles County General Plan in 2015. Therefore, under the applicability rule of the 2035 General Plan, the applicant may choose whether the application will be reviewed for consistency with the 1980 General Plan or the 2035 General Plan. The Regional Planning Commission (RPC) approved the Project on January 8, 2008 and the decision was later appealed to the Board of Supervisors (BOS). In 2015, the BOS remanded the Project to the RPC with instructions to update CEQA review and mitigation measures and address the issues raised by local constituents. The Project would be anticipated to comply with all regulations as stated under the General Plan 1980, however additional analysis will be provided in the EIR.

The Project is proposing a land division and low density single-family residential development for the site, which would include 25 residential lots, public streets, a recreation lot, a public facilities lot, one water tank lot, and an open space lot. The northwestern portion of the site would be preserved as open space. The Project Site is zoned as RPD-30,000-1.5U (Residential Planned Development – 30,000 square feet minimum lot size – 1.5 dwelling units per acre) and R-1-10,000 (single-family residence, 10,000 square feet minimum). Building pads on proposed lots 1 through 14 and 23 through 25 are proposed to be within the R-1-10,000 zoned area. Building pads on lots 15 through 22 are proposed to be in both the R-1-10,000 and RPD-30,000-1.5U zones. All the proposed residential lots are greater than 26,000 gross sq. ft, with the lots that cross into the RPD-30,000-1.5U zone all being greater than 37,000 gross sq. ft. Lot 20 is the smallest of these with 31,829 net sq. ft. where 29,048 net sq. ft. minimum is required. The Project is consistent with the R-1-10,000

and RPD-30,000-1.5U zoning classification. Single family residences are permitted in the R-1-10,000 zone pursuant to Section 22.20.070 of the Los Angeles County Code (County Code) and in the RPD zone by Section 22.20.460 of the County Code. The Project proponents will seek a Conditional Use Permit (CUP) as required. Specific density will be established via CUP in compliance with Title 22, chapter 22.20.460 and will comply with the conditions in the CUP. As the Project would comply with all General Plan 1980 and General Plan 2035 goals and policies and would comply with the conditions of the CUP. The proposed land uses are consistent with existing zoning classifications for the site. As the Project would comply with the existing zoning and conditions of the CUP, it is substantially consistent with the goals of the General Plan 1980 and General Plan 2035 identified above. Therefore, the Project would have a less than significant impact related to inconsistency with applicable County and local plans. Additional detailed analysis and further discussion will be provided in the EIR.

**c) Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?**

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**Less Than Significant Impact.** Hillside Management Areas (HMAs) are defined as areas with 25% or greater natural slopes. As the application for a vesting tentative tract map was deemed complete prior to January 8, 2008, the Project is analyzed according to the local regulations in place at the time, including the General Plan 1980 and the 1982 Hillside Management and Significant Ecological Areas Ordinance, regulated through Section 22.56.215 of Title 22, Los Angeles County Zoning Code. The Project is zoning compliant and therefore would not conflict with the goals and policies related to Hillside Management Area Ordinance. Additional detailed analysis and further discussion will be provided in the EIR.

## 12. MINERAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>Would the project:</b>				
<b>a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**No Impact.** According to the County of Los Angeles General Plan, Chapter 9, Conservation and Natural Resources Element, mineral resources include commercially-viable aggregate or mineral deposits, such as sand, gravel, and other construction aggregate. The California Geological Survey identifies and maps deposits of these regionally-significant aggregate resources, and these areas are designated as Mineral Resource Zones (MRZs). In addition, mineral resources include areas appropriate for the drilling and production of oil and natural gas. The California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) has jurisdiction over on-shore subsurface oil and gas activities in California. Based on information provided by the California Geological Survey and DOGGR, the Project site is located within a MRZ-1, meaning no significant mineral deposits are present and little likelihood exists for their presence and is not located in an oil and gas resource area.<sup>36</sup> Therefore, the proposed Project would not result in the loss of availability of a known mineral resource. The Project would have no impact on mineral resource availability and no mitigation measures are required.

<b>b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**No Impact.** As the application for a vesting tentative tract map was deemed complete prior to January 8, 2008, the Project is analyzed according to the local regulations in place at the time, including the 1980 General Plan. The Project site is not located in a MRZ or in an oil and gas resource area, nor is it designated for such uses by the County General Plan or Zoning Code.<sup>37</sup> Therefore, the proposed Project would not result in the loss of availability of a locally-important mineral resource recovery site. The Project would have no impact on local mineral resource recovery sites and no mitigation measures are required.

<sup>36</sup> California Department of Conservation, Mineral Land Classification, Accessed on October 3, 2019 at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>.

<sup>37</sup> Ibid.

### 13. NOISE

<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project 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?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The following noise analysis is primarily based on the Noise Impact Analysis – Woodland Hills Project, written by Giroux & Associates, dated November 9, 2017.

**Potentially Significant Impact.** The County of Los Angeles limits construction activities to daytime hours. Additionally, use of any powered equipment or powered hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet from construction and industrial machinery is prohibited unless mitigation is technically infeasible. For a typical residential receiver across Randiwood Lane, temporary noise from heavy equipment operating at the center of the closest parcel would not likely exceed the County of Los Angeles suggested construction noise level of 75 dB. However, this threshold could be marginally exceeded if heavy equipment were operated at the closest property line. The only construction equipment that would be used immediately adjacent to the existing homes would be graders as the hillside is formed and compacted. A grader operating at the property line could be 2 dB over the recommended 75 dB Leq noise level. However, equipment used in grading would be required to have a muffler in good operating condition, as a muffler can reduce noise by about 10 dB.<sup>38</sup> Using graders with mufflers or other noise reducing features would allow the recommended noise thresholds to be met at the closest existing sensitive use. Nevertheless, additional detailed analysis and further discussion will be provided in the EIR.

An increase in operational noise would be a result of increased residential traffic which would be consistent with the large existing 176-home residential development to the east across Randiwood Lane and adjacent to the Project. As stated in the Los Angeles County Public Works Department Traffic Study for Kittridge Road in 2014, the addition of 25 residences would add another 189 daily trips using standard trip rates for single family use. This is less than the +3 dB traffic noise impact threshold of significance. Therefore, traffic noise increases associated with the proposed Project would be less-than-significant. An increase of +1.3 dB could be slightly above the threshold of perception but would not exceed the +3 dB CNEL threshold of significance. On a high traffic count day, impacts will be more diluted and therefore lower impact with an increase of only +1.0 dB CNEL. Therefore, operational impacts from increased traffic are less than significant. Nevertheless, additional detailed analysis and further discussion will be provided in the EIR.

<sup>38</sup> Bolt, Beranek and Newplan, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, December 1971.



b) Generation of excessive groundborne vibration or groundborne noise levels?

☐☐☒☐

**Less Than Significant Impact.** The primary source of groundborne vibration from the Project would be during construction from construction equipment. In Section 12.08.560 of the Los Angeles County Code, operation of any device that creates vibration above the vibration threshold beyond a private property boundary is prohibited. According to Caltrans, the threshold for structural vibration damage for modern structures is 0.5 in/sec for intermittent sources, which include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment. The damage threshold criterion of 0.2 in/sec is appropriate for older fragile buildings (typically historic). Below this level there is virtually no risk of building damage.

The primary source of groundborne vibration from the Project would be during construction from construction equipment. The closest Project property line is 75 feet from the nearest off site existing residential structure. At this distance there is little likelihood for vibration to be detectable and most equipment would be used at a distance greater than 75 feet. Vibration from construction equipment would be well below the structural damage threshold of 0.2 in/sec. Therefore, the vibration level is considered acceptable and construction activity vibration impacts would be less than significant.

c) For a project located within the vicinity of a private airstrip or 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, would the project expose people residing or working in the project area to excessive noise levels?

☐☐☐☒

**No Impact.** The Project Site is not located within an airport land use plan area and is not within two miles of a public or private airport or airstrip. The nearest airport is the Van Nuys Airport which is over 10 miles east of the Project Site. Therefore, noise impacts related to air travel would have no impact.

## 14. POPULATION AND HOUSING

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Induce substantial unplanned 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less Than Significant Impact.** The Project proposes to add 25 residential homes in an area zoned for residential development. The Project Site is served by existing infrastructure, including existing roads, utilities (water, sewer, solid waste, electricity, natural gas, telecommunications), and services (fire, police, schools, parks). According to the U.S. Census Bureau, the average household size in Los Angeles County is 3.01 persons per dwelling unit (2013-2017).<sup>39</sup> Based on this rate, the proposed Project is expected to generate approximately 75 additional residents.

The Southern California Association of Governments' (SCAG's) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) forecasts for population and housing growth from 2012 through 2040 for the unincorporated areas of the County of Los Angeles are shown in Table 5, 2016-2040 SCAG RTP/SCS Growth Forecasts for the Unincorporated Areas of Los Angeles County below.

**Table 5**  
**2016-2040 SCAG RTP/SCS Growth Forecasts for the Unincorporated Areas of Los Angeles County**

Year	Population	Housing
2012	1,040,700	292,700
2040	1,273,700	392,400
<b>Change in Growth 2012-2040</b>		
Net Change	233,000	99,700
Rate of Growth	22.4%	34.1%
Source: SCAG. 2016. RTP/SCS Appendix, Table 11, Jurisdictional Forecast 2040. April (Adopted).		

The unincorporated County projects a population of 1,273,700 people and 392,400 housing units by 2040. The proposed Project would generate approximately 75 additional residents, which represents approximately 0.005 percent of the forecasted population in 2040 and approximately 0.03 percent of the projected change in growth between 2012 and 2040. As such, the proposed Project is within the SCAG's 2016-2040 RTP/SCS population and housing forecasts and growth rates listed above. The proposed Project would not generate a substantial residential population and would not extend existing infrastructure, or develop new infrastructure, that would induce population growth. In addition, the Project would provide residential housing, which would

<sup>39</sup> U.S. Census Bureau, Quick Facts, Los Angeles County. Accessed on June 19, 2019 at: <https://www.census.gov/quickfacts/fact/table/losangelescountycalifornia/PST045218#viewtop>.

help accommodate the projected growth within the County. Therefore, impacts associated with population growth would be less than significant.

**b) Displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?**

☐☐☐☒

**No Impact.** The Project is located on a previously undeveloped parcel in the urban community of West Hills in the western portion of the San Fernando Valley. As the Project Site is currently vacant, it would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, the Project would have no impact.

## 15. PUBLIC SERVICES

<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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a) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection?



**Potentially Significant Impact.** The Project Site is located within the jurisdiction of the Los Angeles County Fire Department (LACoFD).<sup>40</sup> The nearest fire station to the Project site is LACoFD Station 68, located at 24130 Calabasas Road which is approximately 4.3 driving miles from the Project Site or 11 minutes in typical traffic conditions. This distance is close enough for the LACoFD to be within the current standard response time for fire service in a rural area, which is 12 minutes or less for rural areas, as stated in the Los Angeles County General Plan Update Draft EIR.<sup>41</sup>

The Project could potentially result in an increase in demand for LACoFD services, as it would develop 25 residential lots, public streets, a recreation lot, a public facilities lot, one water tank lot, and an open space lot. The northwestern portion of the site would be preserved as open space. In addition, the Project is located within a Very High Fire Hazard Severity Zone (VHFHSZ),<sup>42</sup> as previously described. However, the Project would be required to comply with applicable regulations, codes and LACoFD site plan review requirements that address building construction, site access, road widths, fire truck turnaround areas, water conveyance, fire flow and pressure, and fire hydrant number and placement.

In October 2006, the Las Virgenes Municipal Water District (LVMWD) completed a Preliminary Water System Design Report for the Project Site (Tract 52652). The findings from this report identified that the Project Site was originally to be Phase II of the currently existing development adjacent to the east (Tract 23762) that was constructed in 1965. The second phase (Project Site) was not constructed largely because a pump station and water storage tank was required to serve the proposed higher elevation residences as well as 25 of the higher parcels in Phase I to the east across Randiwood Lane. The cost for this new infrastructure would have been borne by the developer. Occasionally there are low pressure complaints from residents in the existing development to the east, and in response LVMWD prepared Report No. 2228.00 which concluded that conditions of service met district rules, but that service pressures dipped as low as 37 psi at some residences and that is less than the District standard minimum service pressure of 43 psi. A new pressure zone is required to serve the Proposed Project Site and the higher elevation residences in the existing development. This system has been planned since the 1960s as part of the original two-phase development.

<sup>40</sup> Los Angeles Department of Public Works, Service Locator, Accessed on June 19, 2019 at: <https://dpw.lacounty.gov/general/servicelocator/>.

<sup>41</sup> Los Angeles County. 2014. General Plan Update Draft Environmental Impact Report. State Clearinghouse No. 2011081042. June.

<sup>42</sup> Los Angeles County Department of Regional Planning, General Plan Figure 12.5: Fire Hazard Severity Zones Policy Map, May 2014.

To serve the Project and bring pressures to District standard of 43 psi for existing higher elevation residences from Phase I to the east, a water storage tank and pump station will be required in accordance with the District policy that fire flow should not be dependent on pumping. Construction of the Project will improve daily residential pressures for existing residences by increasing them to the District standard of 43 psi as well as provide critical water storage capacity to combat fires for the larger area.

Additionally, LACoFD has already reviewed the Project and has determined that the Project would not create a life safety concern, as mentioned in a letter that can be found in **Appendix H**, from LACoFD dated March 13, 2008. The Project would also comply with the Conceptual Fire Protection Plan for West Hills Community, submitted June 24, 2016 and revised January 21, 2019, and included as **Appendix I**. The Project Conceptual Fire Protection Plan would be reviewed and approved by the LACoFD and ensure the Project's compliance with all applicable rules and regulations of the LACoFD including roads, fire flow, ignition resistant building construction and vegetative fuel modification. In addition, the Project would include concrete block walled closets within the first floor of every residence to provide fire shelter in case of an emergency. With the above Project design features required by LACFD, which will be reviewed and approved during plan check, prior to issuance of building permits, and as the Project would comply with all applicable fire and safety codes and standards of the LACFD, including the Fuel Modification Plan, the Project is expected to result in a less than significant impact related to fire protection facilities and service. Nevertheless, additional detailed analysis and discussion will be provided in the EIR.

**Sheriff protection?**



**Potentially Significant Impact.** The Project site is located within the jurisdiction of the Los Angeles County Sheriff's Department (LASD). The Malibu/Lost Hills Sheriff's Station serves the Project area and is located at 27050 Agoura Road,<sup>43</sup> which is 8.4 driving miles from the Project Site, at a driving time of approximately 16 minutes in typical traffic conditions. As of November 2019, the Malibu/Lost Hills Sheriff's Station was staffed by 145 sworn personnel and 36 civilian employees and approximately 91,100 people are currently being served by the Station. The Station is currently understaffed, and as additional Project information becomes available, the Station will provide additional comments.<sup>44</sup>

The LASD maintains mutual aid agreements with other County and State law enforcement agencies such that additional support may be requested and received as needed to respond to emergencies or natural disasters.<sup>45</sup> According to the General Plan EIR, LASD staff has indicated that an officer-to- population ratio of one officer to every 1,000 residents provides the desired level of service for its service area. The Project would resulting in an increase of approximately 75 additional residents. In addition, the Project Site currently includes night lighting for security and wayfinding purposes. Impacts relative to new or physically altered police facilities would likely be less than significant, however the potential for significant impacts exists. This information will be incorporated in the EIR once obtained.

**Schools?**



**Less Than Significant Impact.** The Project site is located within the service area of the Las Virgenes Unified School District (LVUSD or District) and is within the service boundaries of Round Meadow

<sup>43</sup> Los Angeles Department of Public Works, Service Locator, Accessed on June 19, 2019 at: <https://dpw.lacounty.gov/general/servicelocator/>.

<sup>44</sup> Vander Horck, Matthew, Malibu/Lost Hills Station Captain, Office of the Sheriff, County of Los Angeles, Letter Correspondence with Envicom Corporation, November 20, 2019.

<sup>45</sup> County of Los Angeles, Los Angeles County Operational Area Emergency Response Plan, Approved February 17, 1998.

Elementary School, Alice C. Stelle Middle School, and Calabasas High School.<sup>46</sup> The Project's proposed development of 25 single-family residences and associated facilities would result in an additional 75 additional residents. According to the Los Angeles County General Plan Update Draft EIR, the student generation rate per residential unit for grades K-12 is 0.7 students per dwelling unit.<sup>47</sup> Using this rate, the Project would generate approximately 18 additional students within the school district, some of which would attend the local elementary, middle, or high school. The LVUSD has 11,300 students enrolled grades pre-K through 12.<sup>48</sup> As the Project would add approximately 18 students to the district, this would likely not constitute a significant impact on schools within the LVUSD. Based on correspondence with the LVUSD, the District does not anticipate the need for a new or expanded school as a result of proposed Project buildout.<sup>49</sup>

In addition, per California Government Code (CGC), the Project would be subject to the payment of school impact fees (Section 53080, CGC). As authorized under Section 17620(a) of the California Education Code (CEC) and Section 65995(b) of the CGC, local school districts are authorized to impose and collect school impact fees in accordance with SB 50<sup>50</sup> at the time of building permit issuance for development activities that occur within their jurisdiction. The funding program established by SB 50 has been found by the Legislature to constitute "full and complete mitigation of the impacts of any legislative or adjudicative act...on the provision of adequate school facilities" (Government Code Section 65995[h]). The fees authorized for collection under SB 50 are conclusively deemed full and adequate mitigation of impacts on school district facilities and impacts would be less than significant.

#### Parks?

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**Less Than Significant Impact.** The low density residential Project is located in unincorporated Los Angeles County, on a previously undeveloped parcel in the community of West Hills in the western portion of the San Fernando Valley on the Ventura County border. El Escorpion Park is adjacent to the north and the Knapp Ranch Park is adjacent to the south. El Escorpion Park is a large open space with hiking and biking trails. Knapp Ranch is also a large park and it has baseball, basketball, tennis, picnic and playground facilities. These are both City of Los Angeles parks and are available to the residents of the Project Site and vicinity. The Project would provide recreational amenities consisting of four tennis courts, a parking lot, and a shade structure that would reduce the impact on parks within the area. In addition, the Project has an obligation to pay Quimby in-lieu fees per Los Angeles County Code Section 21.28.140. This obligation will be met by the payment of in-lieu fees by the applicant to the Los Angeles County Parks and Recreation Department. Based on Project design features and compliance with Quimby Fees, impact of the Project would be less than significant.

#### Libraries?

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**Less Than Significant Impact.** The Project Site is served by the County of Los Angeles Public Library. The nearest public library to the site is the Topanga Library, which is located 10.8 miles from the Site. Additional public libraries located in the Project area are the Malibu Library and Agoura Hills Library.<sup>51</sup> The proposed Project is expected to generate approximately 75 additional residents, and therefore may have a

<sup>46</sup> Las Virgenes Unified School District, My School Locator, Accessed on June 19, 2019 at: <http://locator.decisioninsite.com/?StudyID=85023>.

<sup>47</sup> Los Angeles County, General Plan Update Draft Environmental Impact Report, June 2014.

<sup>48</sup> Las Virgenes Unified School District, Get to Know LVUSD, Demographics, Accessed on June 25, 2019 at: <https://www.lvusd.org/Page/86>.

<sup>49</sup> Kimmel, Karen, Assistant Superintendent, Business Services, LVUSD, Letter Correspondence with Envicom Corporation, November 20, 2019.

<sup>50</sup> Senate Bill 50 ("SB 50," also known as Proposition 1A, codified in California Government Code Section 65995 et seq.)

<sup>51</sup> Los Angeles County Library, LA County Library Locations, Accessed on June 19, 2019 at: <https://lacountylibrary.org/library-locator/>.



marginal increase in library facilities within the area. A Library Facilities Mitigation Fee<sup>52</sup> would be assessed to equitably distribute the cost of service provision resulting from an increase in users. Consequently, minimal increased library usage resulting from the proposed Project would be off-set by the payment of the Library Facilities Mitigation Fee.

**Other public facilities?**



**Potentially Significant Impact.** The Project would generate an additional 75 residents within unincorporated Los Angeles County, a 0.0007 percent increase over the County's current unincorporated population.

The California Integrated Waste Management Act (AB 939, Sher, Chapter 1095, Statutes of 1989 as amended [IWMA]) made all California cities, counties, and approved regional solid waste management agencies responsible for enacting plans and implementing programs to divert 25 percent of their solid waste by 1995 and 50 percent by year 2000. Later legislation mandates the 50 percent diversion requirement be achieved every year. The California Department of Resources Recycling and Recovery (CalRecycle) oversees and provides assistance to local governments as they develop and implement plans to meet the mandates of the IWMA and subsequent legislation.

CalRecycle has statutory requirements under Public Resources Code (PRC) sections 41813 and 41850(a) to enforce the provisions of AB 939 if a local jurisdiction fails to submit an adequate element or plan or if a local jurisdiction fails to implement its Source Reduction and Recycling Element (SRRE) or Household Hazardous Waste Element (HHWE).

Additional regulations (14 CCR sections 18750 – 18751.8, 18760 – 18775) clarify and provide guidance to local jurisdictions who prepare their HHWE. The HHWE specifies how household hazardous wastes generated by households within the jurisdiction must be collected, treated, and disposed. The HHWE is addressed in two Articles of Title 14, Chapter 9, of the CCR: Article 6.3, the Household Hazardous Waste Element; and Article 7.0, the Procedures for Preparing and Revising City and County Source Reduction and Recycling Elements, and Household Hazardous Waste Elements.

The HHWE of each jurisdiction discusses alternatives that can include periodic community-wide or neighborhood collection, permanent drop-off sites, mobile waste collection, curbside collection, load-checking at solid waste facilities, and waste exchange, reuse and recycling programs. Specificity of the alternatives discussed is up to the discretion of the local jurisdiction.<sup>53</sup> The local jurisdiction is responsible for educating residents in the available programs that may include, but are not limited to, providing new homeowners with educational materials on collection schedules, collection centers, and proper management and disposal of household hazardous waste. The proposed Project may generate household hazardous waste and the EIR will evaluate the effect of this Project on existing infrastructure.

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<sup>52</sup> § 22.72.030. Establishment of library facilities mitigation fee.

<sup>53</sup> Cal Recycle, History of California Solid Waste Law, 1985-1989, Accessed on March 4, 2020 at: <https://www.calrecycle.ca.gov/laws/legislation/calhist/1985to1989>.

## 16. RECREATION

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less Than Significant Impact.** The Project may marginally increase the use of existing neighborhood/regional parks or other recreation facilities. The El Escorpion Park is adjacent to the north and the Knapp Ranch Park is Adjacent to the south. El Escorpion Park is a large open space with hiking and biking trails. Knapp Ranch is also a large park and it has baseball, basketball, tennis, picnic and playground facilities. These are both City of Los Angeles parks and are available to the residents of the Project Site and vicinity. The Project would provide recreational amenities consisting of four tennis courts, a parking lot, and a shade structure that would reduce the impact on parks within the area.

In addition, the Project has an obligation to pay Quimby in-lieu fees per Los Angeles County Code Section 21.28.140. This obligation will be met by the payment of in-lieu fees by the applicant to the Los Angeles County Parks and Recreation Department. Based on Project design features and compliance with Quimby Fees, the Project would result in a less than significant impact related to the use and physical deterioration of existing neighborhood and regional parks or other recreational facilities.

b) Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Less Than Significant Impact.** The proposed Project does include recreational facilities on site in the form of four tennis courts and a shade structure. The Project requires the construction of these facilities on Lot 28. These recreational facilities would be constructed along with the demolition and construction of other facilities on the Project site, as described in the Project Description. El Escorpion Park is adjacent to the north and the Knapp Ranch Park is adjacent to the south. These are both City of Los Angeles parks and are available to the residents within walking distance and no impact to local street parking is anticipated. The impact of the Project on would be less than significant.

c) Would the project interfere with regional open space connectivity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Less Than Significant Impact.** The Site lies along the eastern margin of a regional-scale habitat linkage referred to as the “Santa Monica - Sierra Madre Connection.”<sup>54</sup> As the Project Site is situated at the edge of

<sup>54</sup> South Coast Wildlands, South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion, Accessed on September 25, 2019 at: [http://planning.lacounty.gov/assets/upl/project/sea\\_SCML-regional-report.pdf](http://planning.lacounty.gov/assets/upl/project/sea_SCML-regional-report.pdf).

existing contiguous urban development of the San Fernando Valley, where growth is planned, the Project would not significantly fragment natural habitats within the linkage, and the Project would not affect movement into or out of the focal points of the linkage, including the Santa Monica Mountains or Sierra Madre Mountains. For these reasons, development of the Project would not have a significant adverse effect on the value of the Santa Monica – Sierra Madre Connection habitat linkage for wildlife movement over the short or long-term, and grading and fuel clearance of undeveloped natural habitats within the linkage would be a less than significant impact. Also, it is noteworthy that other potential routes exist for three of the focal species (deer, badger, and mountain lion) analyzed in the linkage design study, and therefore connectivity would remain between the Santa Monica and Sierra Madre Mountains.

## 17. TRANSPORTATION

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Potentially Significant Impact.** The Project-specific Trip Generation Technical Memorandum, provided by Transpo Group on September 19, 2017, which is attached in **Appendix J**, estimates that the proposed Project would generate approximately 238 daily trips, 19 AM peak hour trips, and 25 PM peak hour trips.

In accordance with Senate Bill 743 (SB 743), the County is updating its traffic impact analysis report guidelines to evaluate transportation impacts based on metrics related to Vehicle Miles Traveled (VMT). As such, the County anticipates a traffic impact analysis based on VMT metrics will be required for the Project. The findings of the VMT-based analysis will be incorporated in the subsequent Environmental Impact Report (EIR). Thus, the transportation and traffic impacts may conflict with the performance of the circulation system and may be potentially significant.

Additionally, the County of Los Angeles Bicycle Master Plan was completed in March 2012 as a sub-element of the Mobility Element of the Los Angeles County General Plan. Within the Bicycle Master Plan, the proposed improvements to and existing bicycle infrastructure are shown, none of which are proposed or located on or near the Project Site. The nearest bike route is a Class II bike lane along Valley Circle Boulevard. Building of the proposed Project would not conflict with goals or existing or proposed infrastructure of the Bicycle Master Plan. As for public transit facilities, the nearest public transit stop is at Valley Circle Boulevard and Kittridge Street. There are three bus lines provided by Metro that can be accessed at this location as shown below in **Table 6, Existing Transit Routes**.

Buildout of the proposed Project would not conflict with or interfere with public transit performance or safety. Therefore, the Project would not conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and impacts would be less than significant.

**Table 6**  
**Existing Transit Routes**

Route	Destinations	Roadway Near Site	Number of Buses During Weekday Commuting Hours		
			Direction	AM (7:00AM-8:00AM)	PM (5:00PM-6:00PM)
Metro 164	Fallbrook Center to Burbank Downtown Station via Victory Boulevard	Valley Circle Boulevard	EB	2	4
			WB	-	-
Metro 165	Fallbrook Center to Burbank Downtown Station via Vanowen Street	Valley Circle Boulevard	EB	-	-
			WB	4	4
Metro 169	Canoga Station to Burbank Airport via Vanowen Street and Saticoy Street	Valley Circle Boulevard	EB	3	1
			WB	2	1
			Total	11	10
Source: Los Angeles County Metropolitan Transportation Authority (Metro), Maps & Timetables, Accessed on June 27, 2018 at: <a href="https://www.metro.net/riding/maps/">https://www.metro.net/riding/maps/</a> .					

**b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?**

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**Potentially Significant Impact.** SB 743 was enacted in September 2013 changing the way transportation impact analysis is conducted under CEQA. Within the State's CEQA Guidelines, these changes include the elimination of auto delay, LOS, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant traffic impacts. In accordance with the Governor's Office of Planning and Research (OPR) revisions to the CEQA Guidelines, a lead agency must evaluate transportation impacts with a VMT-based metric by July 1, 2020. As such, the County anticipates a traffic impact analysis based on VMT metrics will be required for the Project. These findings will be incorporated in the Environmental Impact Report (EIR).

**c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

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**Less Than Significant Impact.** The Project would involve buildout of one main public road that would loop from Kittridge Street to Randiwood Lane. From the extension of Kittridge Street there will be a cul-de-sac built to access ten of the lots. There will also be a road that extends from the northwest portion of the main loop to provide access to the recreation and water tank lot. All of the new roads would be required to comply with standards within the Los Angeles County Code of Ordinances and are subject to approval. Given that the proposed Project is a residential Project next to an existing residential area, its design will be consistent with the existing uses and would not create incompatible uses. Therefore, the Project would result in a less than significant impact in this regard.

d) Result in inadequate emergency access?



**Potentially Significant Impact.** Access to the Project would be provided primarily via Kittridge Street but would also be able to be accessed via Randiwood Lane. Prior to construction, the Project plans would be subject to approval by the Los Angeles County Fire Department. As the main access to the Project Site is a loop, there would be emergency access from two directions. The Project is adding 25 additional residential homes at the end of an existing residential development and thus would not affect or alter existing emergency access. The LACoFD has already reviewed the Project and has determined that the Project would not create a life safety concern, as mentioned in a letter that can be found in **Appendix H**, from LACoFD dated March 13, 2008. Therefore, the Project would have a less than significant impact to emergency access. Nevertheless, additional detailed analysis and further discussion will be provided in the Environmental Impact Report (EIR).



## 18. TRIBAL CULTURAL RESOURCES

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<i>Potentially Significant Impact</i>			

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k), or

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The following tribal cultural resources analysis is primarily based on the Phase I(b) Cultural Resource Assessment, prepared by Envicom Corporation, dated November 12, 2018

**Potentially Significant Impact.** The Native American Heritage Commission (NAHC) was contacted on February 27, 2017, with a request to search their database for cultural resources within the Project ADI and within the larger 0.5-mile study area. A response from the NAHC was received on March 3, 2017, which was negative for cultural resources within the project site. The United States Geographical Survey (USGS) historic map database was reviewed as part of the Phase I(b) Cultural Resource Assessment (Phase I(b)). Sixteen historic USGS and other government maps were reviewed for a historic history of the Project property dating back to 1903. The database was negative for historic built environment resources with any development shown on the maps outside of the project development area. There is no other development on the historic maps until the 1960s when roads and flood control start to show up on the Project Site. Based off of Google Earth images that go back to 1989, there are clear roads and flood control features on the property.

Due to the Project's property historic cultural resource records being negative for early 20<sup>th</sup> Century cultural resources within the Project development area, and due to the limited early historic development of the Project property region, the Phase I(b) considers the Project to not be sensitive for historic cultural resources. Therefore, the Project has a less than significant impact on historical resources.

Pursuant to AB 52, lead agencies must provide notice to California Native American tribes that are traditionally and culturally affiliated with the geographic area wherein a Project is proposed, inviting consultation, if the Tribe has submitted a request in writing to be notified of proposed Projects. The Tribe must respond in writing within 30 days of the County's AB 52 notice. Additional information will be provided by County staff once obtained.

Based on records search results and tribal consultation, the Project would have a less than significant impact regarding potential substantial adverse changes in the significance of a tribal cultural resource, as defined in Public Resources Code section 21074, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources. However, the records search did identify reports and resources within the study area, although not adjacent nor near the Project Site, so the potential exists. Additional detailed analysis and further discussion will be provided in the EIR.

**ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**



**Potentially Significant Impact.** The Project was analyzed based on the South Central Coastal Information Center (SCCIC) record search, NAHC record search, the examination of several historic map and image databases, and a pedestrian survey of the development portion of the Project property (development area). The SCCIC record search was positive for a single cultural resource (CA-LAN-1223), which was described as a low-density prehistoric artifact scatter with potential midden deposits. Additionally, 13 cultural resources and 17 cultural resource reports were listed as being within the 0.5-mile study area, which included the remaining property open space. Eight (8) overview reports included the development area, however, such reports do not specifically focus on cultural resources, and instead provide general cultural resource or historical background on the area. As such, the development area is considered sensitive for prehistoric cultural resources. No historic era cultural resources were identified, resulting in the development area being described as not sensitive for historic cultural resources.

The results of the 2017 Phase I(a) pedestrian survey identified that most of the Project development area was negative for cultural resources due to modern impacts associated with an aborted 1980s development Project, which included unpaved road paths, earthen platforms and berms, and flood control facilities. All non-impacted sloped areas within the development area were also found to be negative for cultural resources as there was no evidence of caves, rock shelters, or quarry locations (as are found elsewhere in the region). Additionally, no historic-era resources were found on the property that dated prior to the observed 1980s landscape modifications.

Two remaining development area locations were considered to be potential locations of prehistoric cultural resources masked by the dense grasses found covering the site. These included the flat area of the CA-LAN-1223 prehistoric cultural resource, and an undisturbed ridgeline saddle area in the north-center of the Project development area. Both areas were further investigated with shovel test pits as part of an extended Phase I(b) subsurface cultural survey. Three prehistoric artifacts were found on the surface of CA-LAN-1223 prior to Phase I(b) subsurface testing including a quartzite core, a granite mano

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fragment and a complete quartzite mano. The cultural resource was then tested with twenty-two (22) shovel test pits, with negative findings. The saddle area was tested with a further ten (10) shovel test pits, again with negative findings. No further cultural resource assessment tasks were recommended for either development area location.

Due to the number of shovel test pits excavated within the original identified boundary of CA-LAN-1223, the lack of extensive surface artifacts, and the lack of prehistoric artifacts recovered from the shovel test pits, Envicom concluded that the potential was low for recovering additional prehistoric artifacts from the CA-LAN-1223 cultural resource. This fact was supported by the original site form, which listed few artifacts identified on the surface of the site. For these reasons, Envicom recommended that the archaeological cultural resource, CA-LAN-1223, is not eligible for inclusion in the CRHR under Criteria 4 (scientific data potential), and therefore is not a significant cultural resource to be further evaluated or managed. Although CA-LAN-1223 was not determined to be significant, the record search was positive for cultural resources and indicated the development area was sensitive for prehistoric cultural resources.

Pursuant to AB 52, lead agencies must provide notice to California Native American tribes that are traditionally and culturally affiliated with the geographic area wherein a Project is proposed, inviting consultation, if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond in writing within 30 days of the County's AB 52 notice. The Project Site is located within a geographic area that is affiliated with the Gabrieleno Band of Mission Indians – Kizh Nation ("Kizh Nation"), Gabrieleno Tongva, and Fernandeno Tatavium Band of Mission Indians. Consultation letters were issued to the tribes on April 26, 2018 via first class mail. On August 21, 2018, the lead agency consulted with Fernandeno Tatavium Band of Mission Indians over the phone and provided the tribe with the Project's Biological Resources Inventory and Impact Analysis dated October 31, 2017 and Phase I Cultural Resource Assessment dated October 2018. The other tribes did not respond the Project notification. Additional detailed analysis and further discussion will be provided in the EIR.

## 19. UTILITIES AND SERVICE SYSTEMS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water draining, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less Than Significant Impact.** Potable water service will be provided to the Project by the Las Virgenes Municipal Water District (LVMWD), which has capacity to provide the water services to the Project with existing infrastructure. LVMWD's potable water is provided almost entirely through wholesale purchases from the Metropolitan Water District of Southern California (MWDSC), which has invested significantly in the development of a diverse resources mix to ensure continued reliability of supplies. The MWDSC anticipates having supplies sufficient to meet water demands through 2040 during average, single dry- and multiple dry-years. It is therefore assumed that the MWDSC can meet the full water demands of the LVMWD.<sup>55</sup>

Wastewater services would be provided by Los Angeles County Public Works<sup>56</sup> Consolidated Sewer Maintenance District (SMD). The Los Angeles County Sanitary Sewer Network covers approximately 824 square miles and the Project site would connect to existing eight inch clay sewer lines located in Randiwood Lane, Welby Way, and Kittridge Street and maintained by the SMD.<sup>57</sup> The County SMD would maintain the Project sewer infrastructure on site, however it ultimately connects to the City of Los Angeles sewer lines further east on Valley Circle Boulevard. As such the wastewater would be treated at the Donald C. Tillman Water Reclamation Plant, which provides tertiary treatment and is one of the leading producers of reclaimed water in the San Fernando Valley. The current treatment capacity is approximately 80 million gallons per day (MGD).<sup>58</sup> As such, the Donald C. Tillman Water Reclamation Plant has the existing capacity to provide wastewater services to the Project and would not require the relocation or construction of new facilities.

The electric, natural gas and telecommunications to be installed for the 25 residential dwellings are consistent with the infrastructure installed in the large residential development to the east and would be served by existing infrastructure. There will be no need for the relocation or construction of new or expansion of existing water or wastewater treatment facilities and therefore impacts will be less than significant.

<sup>55</sup> Las Virgenes Municipal Water District, 2015 Urban Water Management Plan Final, August 17, 2016, Accessed on June 20, 2019 at: <https://www.lvmwd.com/home/showdocument?id=6877>.

<sup>56</sup> County of Los Angeles, Department of Public Works, Inter-departmental Correspondence regarding Draft Initial Study, Tract No. 52652- West Hills Crest Residential Project, County Unincorporated Community of West Hills, February 24, 2020.

<sup>57</sup> Los Angeles County, Consolidated Sewer Maintenance Districts, Map N-1189, Revised February 19, 2008.

<sup>58</sup> City of Los Angeles, LA Sanitation, Donald C. Tillman Water Reclamation Plant, Accessed on February 26, 2020 at: [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?\\_afLloop=3249531547461163&\\_afWindowMode=0&\\_afWindowId=null&\\_adf.ctrl-state=19v22toeq\\_731#!%40%40%3F\\_afWindowId%3Dnull%26\\_afLloop%3D3249531547461163%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3D19v22toeq\\_735](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?_afLloop=3249531547461163&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=19v22toeq_731#!%40%40%3F_afWindowId%3Dnull%26_afLloop%3D3249531547461163%26_afWindowMode%3D0%26_adf.ctrl-state%3D19v22toeq_735).

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

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**Less Than Significant Impact.** As stated above, the Project will be served by the LVWMD, which has the water supplies available to serve the Project. The LVMWD's supplies are provided primarily by the MWDSC, which anticipates having supplies sufficient to meet water demands through 2040 during average, single dry- and multiple dry-years. It is therefore assumed that the MWDSC can meet the full water demands of the LVMWD.<sup>59</sup> Therefore, there is sufficient water supply available to serve the Project from existing entitlements and resources and impacts related to water supplies would be less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

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**Less Than Significant Impact.** As stated above, the Los Angeles County Public Works SMD would maintain the sewer infrastructure and wastewater would be treated at the City of Los Angeles' Donald C. Tillman Water Reclamation Plant, which provides tertiary treatment the current treatment capacity is approximately 80 MGD. As such, the Donald C. Tillman Water Reclamation Plant would have the capacity to serve the Project's projected demand in addition to the provider's existing commitments and impacts would be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

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**Less Than Significant Impact.** The Project includes the construction of new facilities at the Project Site. During construction, the Project would be subject to the Green Building Standards Code that requires a minimum of 65 percent of the debris generated to be recycled.<sup>60</sup> To reduce the amount of demolition and construction debris disposed at landfill facilities, pursuant to County Municipal Code Chapter 20.87, Construction and Demolition Debris Recycling and Reuse, the Project would be required to prepare a recycling and reuse plan for review and approval by the Department of Public Works, Environmental Programs Division. The plan would demonstrate compliance with the recycling or reuse rate for construction and demolition materials applicable at the time that of building permit application submittal. In addition, the Project would provide adequate recyclable storage areas for collection and storage of recyclable and green waste materials pursuant to the California Solid Waste Reuse and Recycling Access Act of 1991 and provide separate collection and recycling of organic waste beginning January 1, 2022 pursuant to Senate Bill 1383.

<sup>59</sup> Las Virgenes Municipal Water District, 2015 Urban Water Management Plan Final, August 17, 2016, Accessed on June 20, 2019 at: <https://www.lvmwd.com/home/showdocument?id=6877>.

<sup>60</sup> County of Los Angeles Department of Building and Safety, 2017 Los Angeles Green Building Code, Green Building Code Plan Check Notes, Rev. January 17, 2017.

For the disposal of solid waste that would be generated and unable to be recycled, the nearest active landfill to the Project site is the Calabasas Landfill. According to the 2016 Annual Report of the County of Los Angeles Countywide Integrated Waste Management Plan, the Calabasas landfill has a maximum permitted daily capacity of 3,500 tons and a remaining permitted capacity of 5,951,595 tons. In 2016, it had an average daily disposal of 951 tons. This leaves a remaining daily disposal capacity of 2,549 tons.<sup>61</sup> As the Project would not increase the maximum permitted enrollment of the existing school and camp that occupy the Project site, it would not increase the population forecasted to generate waste at the Project site. Therefore, the Project would result in a less than significant impact on landfill capacity.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

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**Less Than Significant Impact.** The Project would be subject to the Green Building Standards Code, which requires that non-residential construction projects recycle a minimum of 65 percent of the demolition and construction debris generated by weight. The Project would also be required to comply with other State and local regulations related to waste reduction, trash removal and disposal, and recycling during the operations of the Project. Therefore, the Project would result in less than significant impacts related to compliance with solid waste regulations.

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<sup>61</sup> County of Los Angeles, Countywide Integrated Waste Management Plan, 2016 Annual Report, September 2017.

## 20. WILDFIRE

	<i>Less Than Significant</i>	<i>Less Than Significant</i>	<i>No Impact</i>
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, Would the project:

a) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

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**Potentially Significant Impact.** The Project is located within a Very High Fire Hazard Severity Zone (VHFHSZ),<sup>62</sup> as previously described. The State Board of Forestry and the California Department of Forestry and Fire Protection (CalFire) have provided comprehensive guidance for wildland fire protection in California. The Fire Plan Unit of LACoFD is in charge of implementing the California Fire Plan in Los Angeles County. The Strategic Fire Plan prepared by LACoFD identifies and prioritizes pre- and post-fire management strategies and tactics to reduce loss of life, property, and natural resources.<sup>63</sup> A letter from the LACoFD dated March 13, 2008, determined “the proposed improvements will not create a life safety concern and will in turn provide an improved buffer for the existing residential community.”

The Project would also comply with the Conceptual Fire Protection Plan for West Hills Community, submitted June 24, 2016 and revised January 21, 2019, and included as **Appendix I**. The Project Conceptual Fire Protection Plan would be reviewed and approved by the LACoFD and ensure the Project’s compliance with all applicable rules and regulations of the LACoFD including roads, fire flow, ignition resistant building construction and vegetative fuel modification. In addition, the Project would include a concrete block walled closet/room within the first floor of every residence to provide fire shelter in case of an emergency. As such, the Project is expected to have a less than significant impact regarding exposing people or structures to a significant risk of loss, injury or death involving wildland fires. Nevertheless, additional detailed analysis and further discussion regarding available facilities and response times will be provided in the Environmental Impact Report (EIR).

<sup>62</sup> Los Angeles County Department of Regional Planning, General Plan Figure 12.5: Fire Hazard Severity Zones Policy Map, May 2014.

<sup>63</sup> Los Angeles County Fire Department, 2017-2021 Strategic Plan, Accessed on June 18, 2019 at: <https://www.fire.lacounty.gov/wp-content/uploads/2018/10/LACoFD-Strategic-Plan-2017-2021.pdf>.



b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?



**Potentially Significant Impact.** The residential Project is located on the top of a hill along an urban wildland interface. It is identified as being in a VHFHSZ, as is all of the existing surrounding residential development.

The Project site will be graded according to the approved grading plan providing large level building lots. The design will not introduce elements that would capture and funnel prevailing winds in a manner that would exacerbate wildfire risks and/or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The roads, building lots and graded and maintained areas of the site will act as a local fire break and the hydrant service will provide water for fire suppression.

The residential dwellings will be constructed in accordance with the most recent fire codes including internal sprinkler systems and fire-resistant materials. The Project will also be subject to compliance with the Fuel Modification Requirements of the Fire Code to protect against wildland fire. In addition to the structures themselves, the properties will be landscaped using fire-resistant native vegetation and will adhere to the guidelines in the Project-specific Fire Management Plan that specifies the distance and the heights of the vegetation to be planted in order to create the maximum defensible space on each parcel. Compliance with Fuel Modification Requirements reduce the potential impact of wildfire spread with the Project vicinity.

As stated above, the Project was reviewed and previously approved by the LACoFD. Existing LACoFD fire stations in the vicinity would serve the proposed project, such as Station 68, located at 24130 Calabasas Road which is 4.3 approximately driving miles from the Project Site or 11 minutes in typical traffic conditions. This distance is close enough for the LACoFD to be within the current standard response time for fire service in a rural area, which is 12 minutes or less for rural area. By complying with all applicable regulations and guidelines, the Project is not expected to exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby would not expose any Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Nevertheless, additional detailed analysis and further discussion will be provided in the EIR.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?



**Potentially Significant Impact.** The Project will require the installation of roads, power lines water storage tanks and other utilities typical of any residential development and its impacts are considered. The new roads will act as additional fire breaks and facilitate access for emergency responders. The utilities will be placed underground and thereby minimize their potential to exacerbate fire risk. Lot 29 will be improved with large water storage tanks that will be dedicated to the Las Virgenes Municipal Water District upon completion. These tanks will provide adequate water pressure for the Project Site and improve pressure for the existing residential subdivision adjacent to the Project Site on the east. This existing subdivision has had long-standing issues with insufficient system pressure since its construction. These tanks will resolve this long-standing pressure problem and provide critical storage capacity for fire suppression for the entire area. The construction of the Project will not exacerbate fire risk or result in temporary or ongoing impacts to the

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environment. Construction will comply with all applicable fire codes and regulations and in actuality provide much needed water capacity not reliant on supplemental pumping to offer much improved needed fire protection for the entire area. As such, Project impacts are expected to be less than significant. Nevertheless, additional detailed analysis and further discussion will be provided in the EIR.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?



**Potentially Significant Impact.** The construction of the Project will comply with all applicable conditions of the grading permit including the development of an erosion control plan and the implementation of Project-specific best management practices (BMPs) to mitigate off-site runoff during construction. The Project Site will be developed in accordance with all accepted compaction and site development standards. It will comply with all the guidance provided by the existing site-specific geotechnical report and all surface runoff will be in compliance with industry standard volume, flow and velocity guidelines. As such the Project impacts are expected to be less than significant and will not expose people or structures to significant risks, including downslope or downstream flooding or landslides. Nevertheless, additional detailed analysis and further discussion will be provided in the EIR.

## 21. MANDATORY FINDINGS OF SIGNIFICANCE

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Potentially Significant Impact.** Although the Project would not directly have an effect that would “substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory,” as cited in the checklist questions, this document conservatively considers the impact potentially significant because of Section 1, Aesthetics, Section 4, Biological Resources, Section 5, Cultural Resources, Section 9, Hazards and Hazardous Materials, Section 11, Land Use and Planning, Section 13, Noise, Section 15, Public Services, Section 17, Transportation, Section 18, Tribal Cultural Resources, and Section 20, Wildfire impacts that require mitigation. This will be discussed in greater detail in the subsequent EIR.

b) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**Potentially Significant Impact.** The preceding analyses identify short-term and long-term effects of the Project, where applicable, in the form of temporary construction period and permanent operational period impacts. The identified potential significant impacts of the Project will be analyzed further in the subsequent EIR to determine whether impacts can be reduced to less than significant levels with the implementation of mitigation measures. In addition, the Project would be consistent with applicable County plans and policies, and it would be consistent with SCAG growth forecasts for the area. Therefore, the Project would not have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals, and impacts would be less than significant.

c) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project 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)?



**Potentially Significant Impact.** As noted in the analysis of each of the environmental issues in this IS, the impacts associated with development of the Project have been evaluated to be "Potentially Significant," "Less Than Significant with Mitigation Incorporated," "Less Than Significant," or "No Impact." For issues that were determined to be "Less Than Significant" or "No Impact," no further analysis or discussion is required. As the net Project impacts would be less than significant, the Project would not add a considerable incremental increase towards a cumulative impact.

For issues that were determined to be "Potentially Significant" or "Less Than Significant with Mitigation Incorporated," further analysis and discussion of individual and cumulative impacts, inclusive of fire access, will be provided in the subsequent EIR. Where practicable, the EIR will identify mitigation measures with the goal of reducing impacts to below the level of significance.

The City of Los Angeles Planning Department staff stated that the area of the project is essentially "built out" with predominantly residential dwellings and there are few development projects in the west valley with the exception of the Warner Center area which is a commercial/retail destination approximately 3.5 miles east of the Project. The City of Los Angeles Department of Transportation provided a list of projects in the area and the nearest project was an infill residential development approximately 2 miles east of the project on Sherman Way. The distance of these projects is significant and as such they are not eligible to be cumulatively considerable.

d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?



**Potentially Significant Impact.** Potentially Significant Project impacts identified in this IS will be analyzed in greater detail in the subsequent EIR and where practicable, the EIR will identify mitigation measures with the goal of reducing impacts to below the level of significance.

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