

Appendices



Appendix 1



Initial Study, Notice of Preparation (NOP), and
NOP Comment Letters

Appendix 1a

Initial Study





Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



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Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

Entrada South and Valencia Commerce Center Project

Entrada South:
Vesting Tentative Tract Map No. 083582

Valencia Commerce Center:
Vesting Tentative Parcel Map No. 18108

INITIAL STUDY

Project No. TBD (New Project No. Forthcoming)¹
State Clearinghouse No. 2000011025

Prepared by:

County of Los Angeles
Department of Regional Planning, Subdivisions
320 W. Temple Street, Room 1362
Los Angeles, CA 90012
Attn: Mr. Jodie Sackett

October 7, 2021

¹ The current VCC Project No. is 87-150-(5); a new Project No. for Entrada South is pending.

Environmental Checklist Form (Initial Study)

County of Los Angeles, Department of Regional Planning



Project title: Entrada South and Valencia Commerce Center (VCC) Project

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

Contact Person and phone number: Mr. Jodie Sackett, Department of Regional Planning, Subdivisions, (213) 974-6433

Project sponsor's name and address: The Newhall Land and Farming Company, a California Limited Partnership, an indirect subsidiary of Five Point Holdings, LLC, 25124 Springfield Court, Suite 300 Valencia, CA 91355. Jennifer Bohen, (949) 349-1000, Jennifer.bohen@fivepoint.com; Alex Herrell, (661) 255-4449, alex.herrell@fivepoint.com

Project location:

Entrada Planning Area: West of I-5 and The Old Road, on the north and south sides of Magic Mountain Parkway, south of Six Flags Magic Mountain theme park in the Santa Clarita Valley

VCC Planning Area: West of I-5 and The Old Road, north of SR-126, and east of Commerce Center Drive and the Chiquita Canyon landfill in the Santa Clarita Valley

APN:

Entrada Planning Area: 2826-008-039, 2826-008-044, and 2826-009-106

VCC Planning Area: 2866-001-001, 2866-002-045, 2866-002-052, 2866-002-061, 2866-002-063, 3271-001-038 (partial)¹

USGS Quad:

Entrada Planning Area: Newhall

VCC Planning Area: Newhall/Val Verde

The Project Site is located within the northwest portion of Los Angeles County (County), west of I-5 and the City of Santa Clarita, as shown on **Figure 1**, Regional Location Map, on page 2. As shown in **Figure 2.1**, Project Vicinity Map, on page 3, the Project Site is located in an unincorporated area of the County, within the Santa Clarita Valley Planning Area (Valley Planning Area). The Project Site's location relative to the local roadway network is depicted in **Figure 2.2**, Local Location and Roadway Network Map, on page 4.

The Project Site is within the planning boundary of the State-approved Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan (RMDP/SCP), which was the subject of a State-certified Environmental Impact Report (EIR) (SCH No. 2000011025; hereafter referred to

¹ The assessor parcel numbers (APNs) listed reflect what is accurate at the time of preparation of this Initial Study. However, the APNs are subject to change over time.

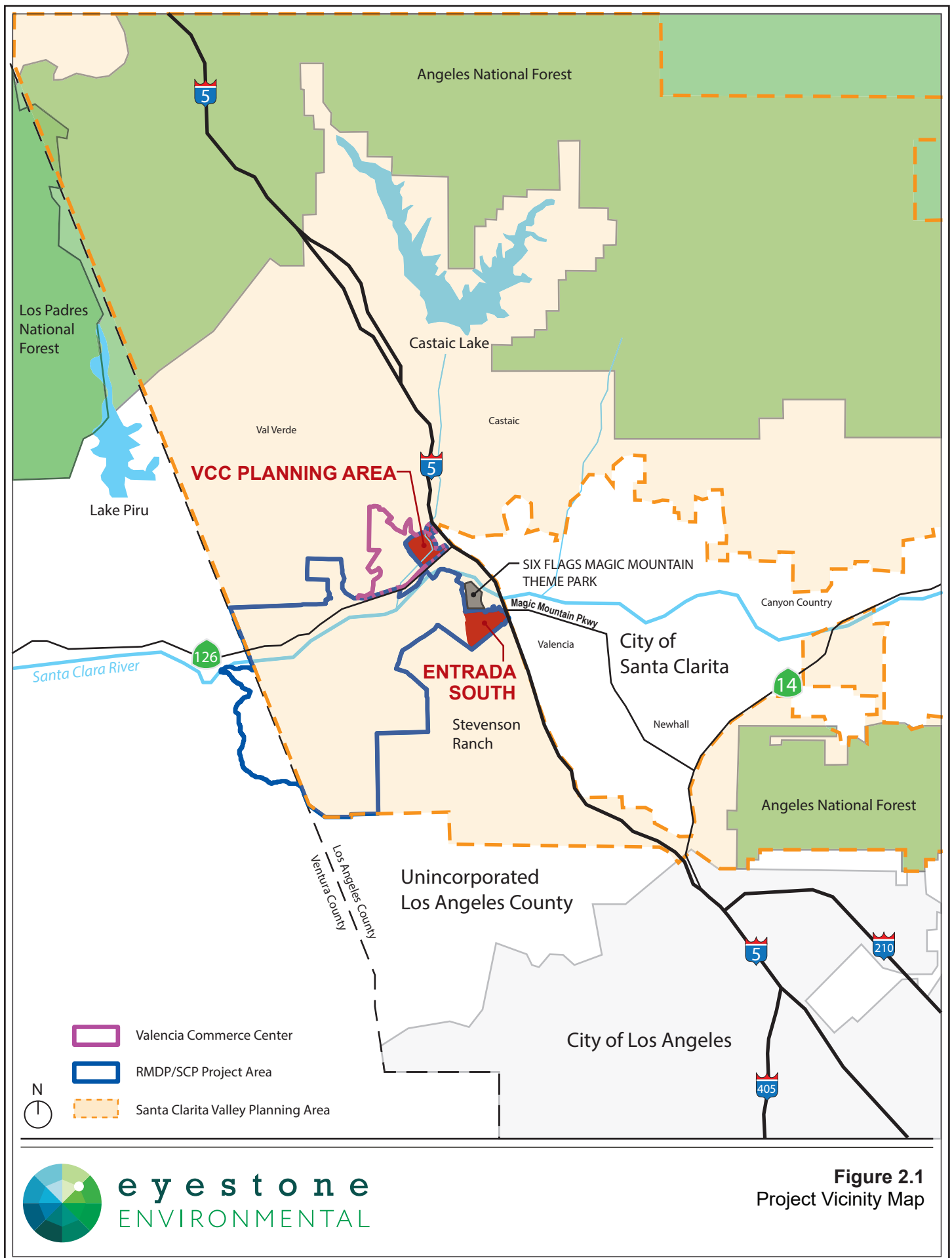


Figure 2.1
Project Vicinity Map

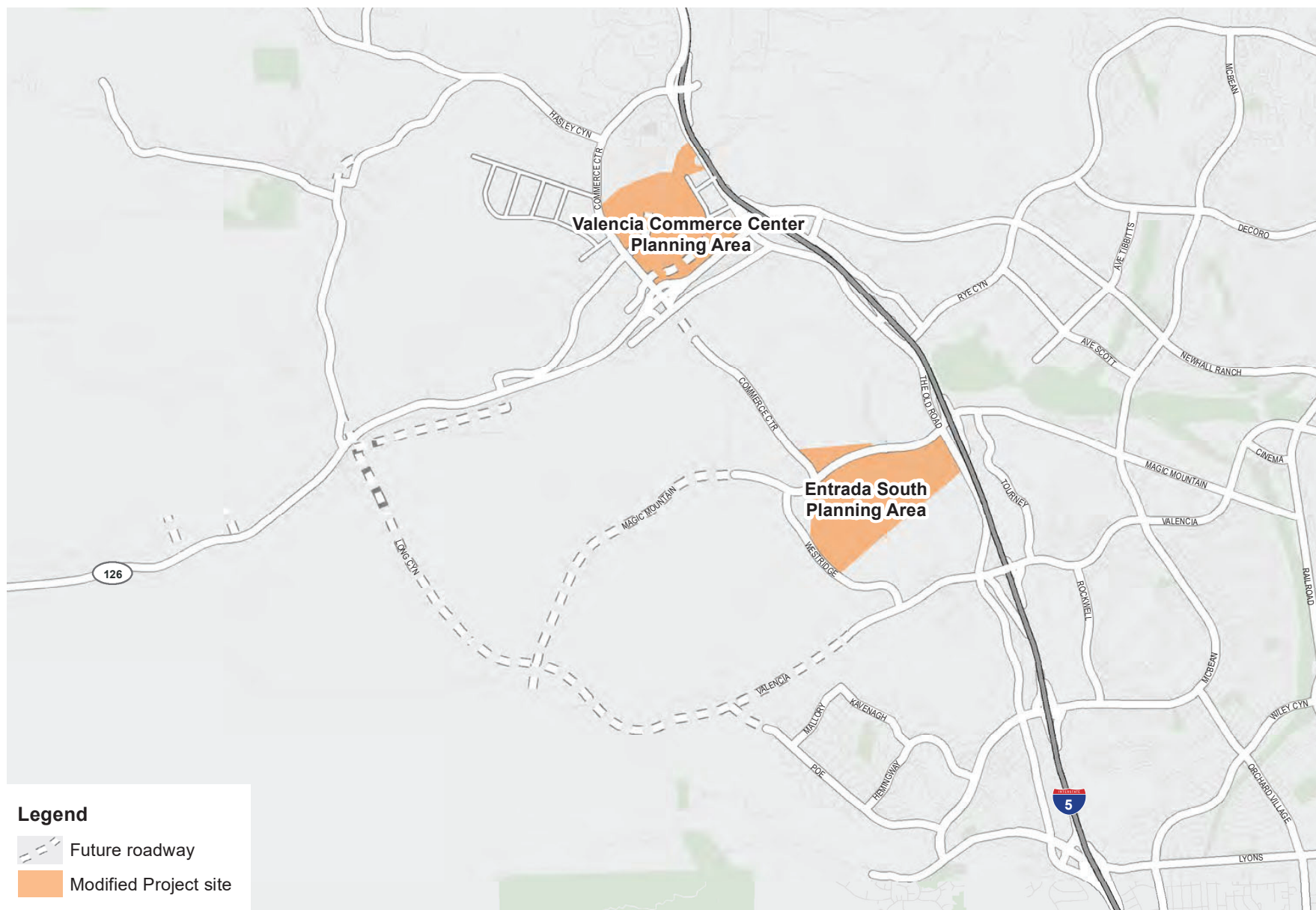


Figure 2.2
Local Location and Roadway Network Map

as the State-certified EIR). In the State-certified EIR for the RMDP/SCP, the Project Site is identified as the “Entrada Planning Area” and the “VCC Planning Area.” The Entrada Planning Area is also sometimes referred to as Entrada South or the Entrada South Planning Area. The Project Site is adjacent to but not located within the Newhall Ranch Specific Plan area.

Entrada Planning Area: The Entrada Planning Area consists of approximately 382 acres located west of I-5 and The Old Road and predominantly south of Six Flags Magic Mountain theme park (Six Flags Magic Mountain).²

VCC Planning Area: The VCC Planning Area consists of approximately 321 acres in an undeveloped portion of the partially completed VCC industrial/business park center located west of I-5 and north of Henry Mayo Drive (SR-126).

Gross Acreage:

<u>Gross Acreage by Planning Area</u>	
<u>Planning Area</u>	<u>Gross Acreage</u>
<u>Entrada South</u>	<u>382 acres</u>
<u>VCC</u>	<u>321 acres</u>
<u>Total Gross</u>	<u>703 acres</u>

General Plan Designation:

Per the Santa Clarita Valley Area Plan: One Valley One Vision 2012 (OVOV Area Plan): H5—Residential 5, south of Magic Mountain Parkway; CM—Major Commercial, north of Magic Mountain Parkway; OS-PR—Parks and Recreation, south of the Southern California Edison electric transmission lines; and IO—Industrial Office. See **Figure 3.1**, OVOV Land Use Designations—Entrada South, on page 6 and **Figure 4.1**, OVOV Land Use Designations—VCC Planning Area, on page 7.

The OVOV Area Plan is a component of the Los Angeles County General Plan intended to provide focused goals, policies, and maps to guide the regulation and development of unincorporated portions of the Santa Clarita Valley. Finalized in 2012, the OVOV Area Plan included extensive public input and resulted from a cooperative effort between the County and the City of Santa Clarita to create a unified plan for the buildout of the Santa Clarita Valley.

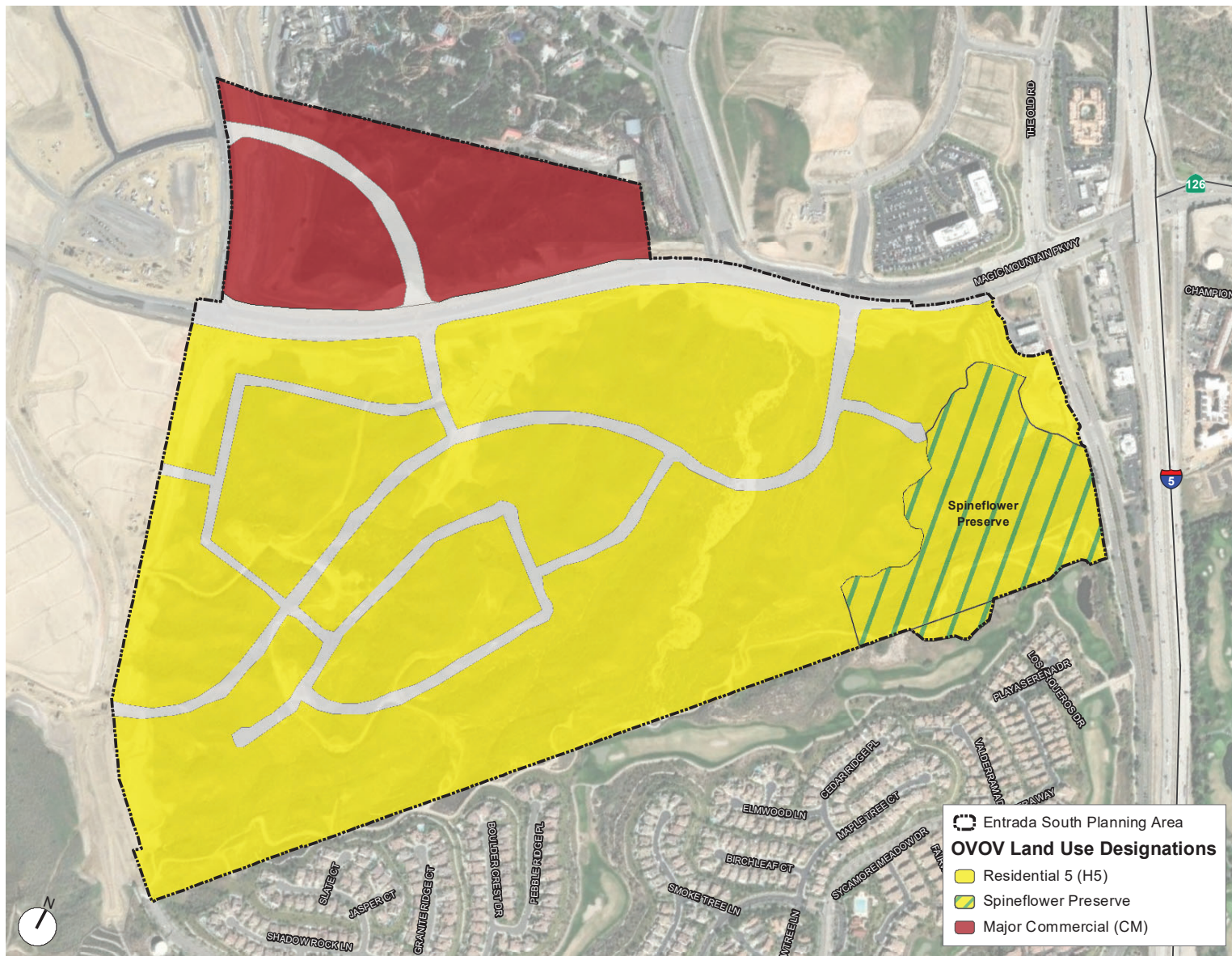
The OVOV Area Plan was the subject of a Programmatic EIR (SCH No. 2008071119) (OVOV EIR), which included projections for the number of dwelling units, non-residential square footage, population, and employment in the OVOV Area Plan.³ The OVOV EIR analyzed potential environmental impacts associated with buildout of the OVOV Area Plan based on the identified land use designations.

Community/Area Plan Designation: See OVOV Area Plan designations listed above.

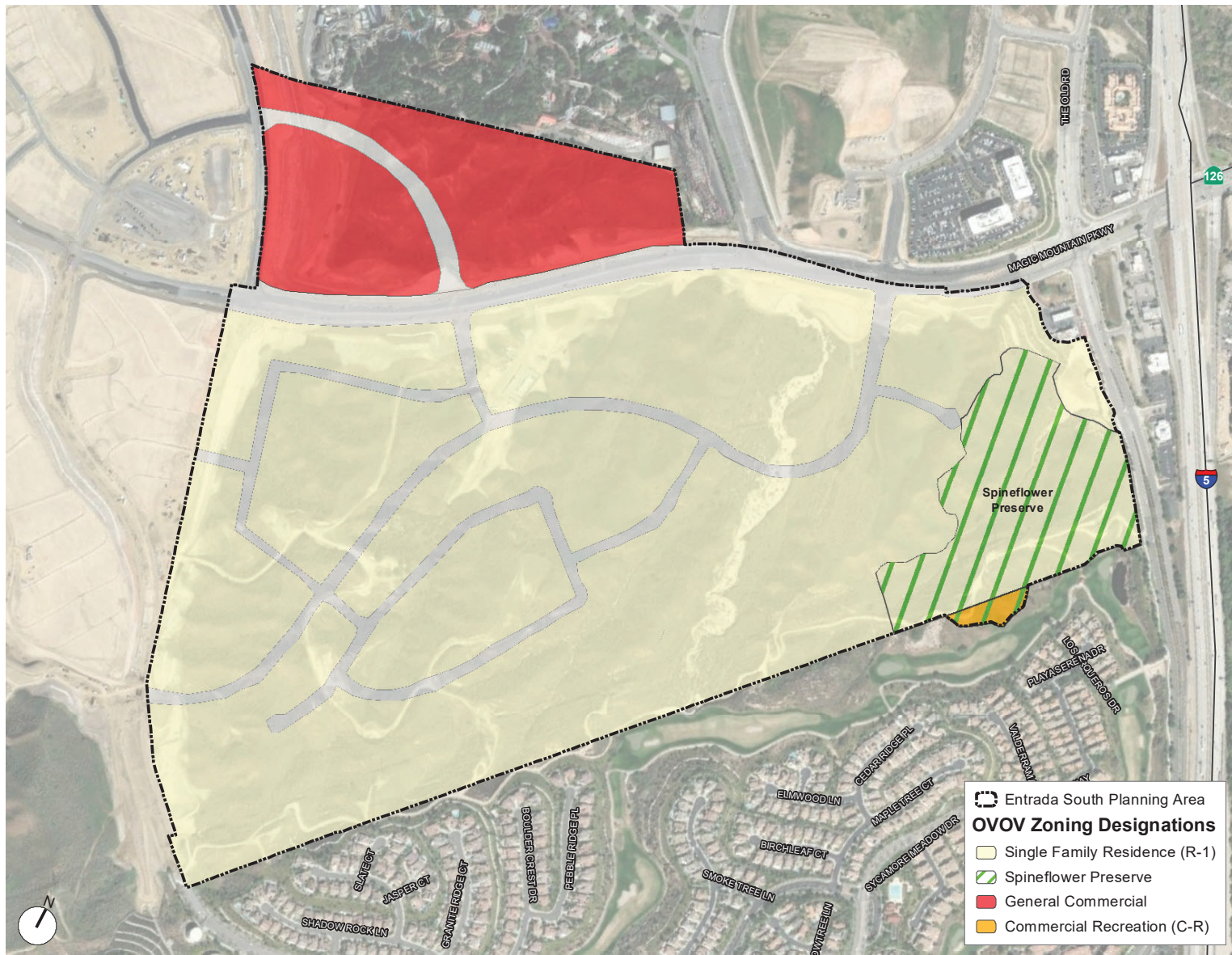
Zoning: R-1—Single-Family Residence, south of Magic Mountain Parkway; C-3—General Commercial, north of Magic Mountain Parkway; C-R—Commercial Recreation, south of the Southern California Edison electric transmission lines; and M-1.5-DP—Restricted Heavy Manufacturing/Development Program. See **Figure 3.2**, OVOV Zoning Designations—Entrada South, on page 8 and **Figure 4.2**, OVOV Zoning Designations—VCC Planning Area, on page 9.

² As studied in the State-certified EIR and approved by CDFW in 2017, Entrada South was represented by the Entrada Planning Area (316 acres), as well as the extension of Magic Mountain Parkway (approximately 66 acres) through the anticipated tract map boundary.

³ OVOV EIR, 2.0-4.







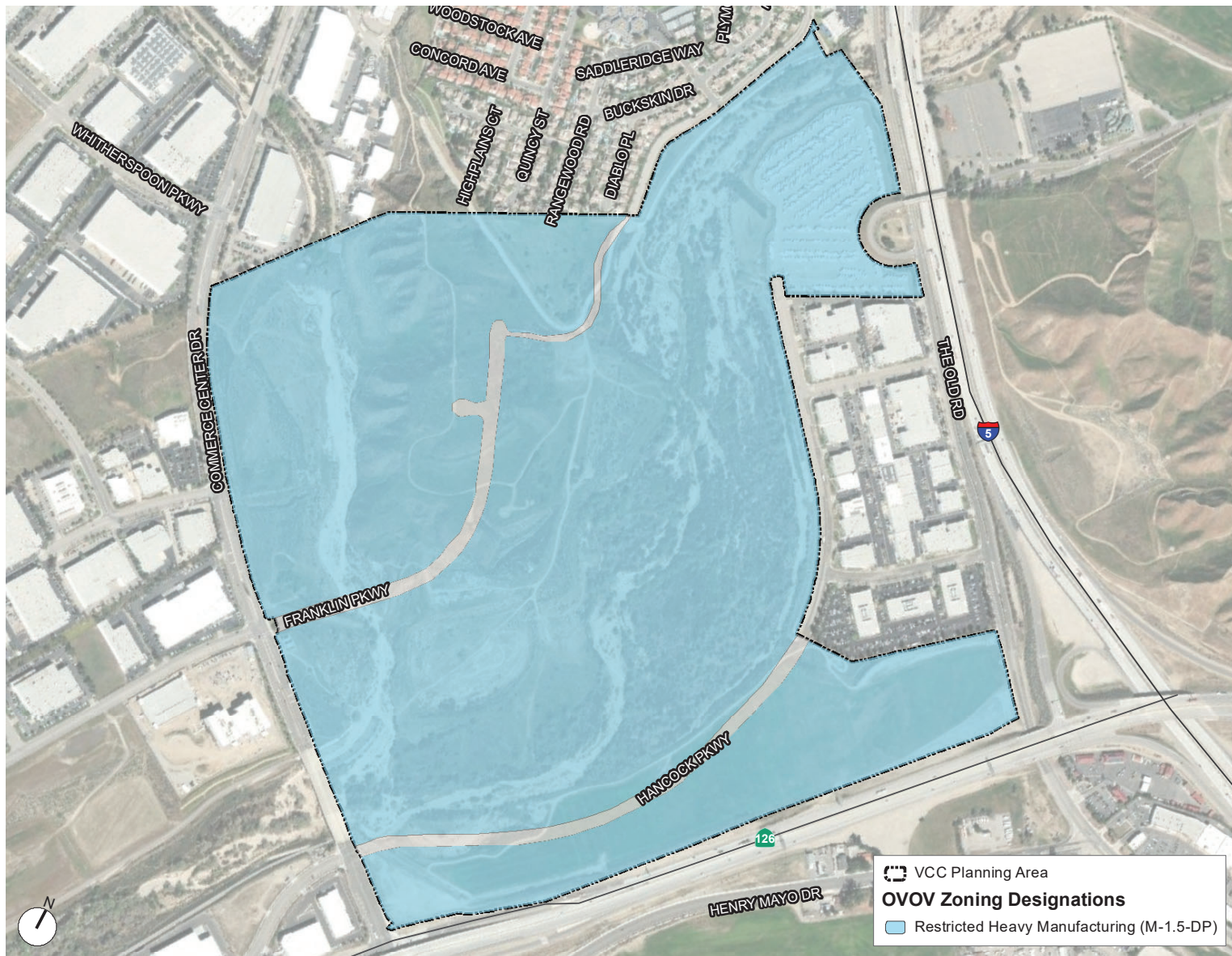


Figure 4.2
OVOV Zoning Designations – VCC Planning Area

The spineflower preserve within the Entrada Planning Area has been permanently dedicated on-site. The Entrada South and VCC Project does not propose any changes to the spineflower preserve.

Description of Modified Project:

Introduction

The Entrada South and VCC Project implements the development within the Entrada and VCC Planning Areas facilitated by the approved RMDP/SCP and analyzed in the State-certified EIR. The California Department of Fish and Wildlife (CDFW) certified the State-certified EIR in June 2017, at which time it also approved the RMDP/SCP and related State permits. Los Angeles County was a responsible agency for the RMDP/SCP and participated in the State-certified EIR process through the receipt and review of the Draft and Final EIRs as well as the Draft and Final Additional Environmental Analysis and the submittal of comments, which were addressed by CDFW. In addition, the Entrada South and VCC Project is consistent with the OVOV Area Plan's projected buildout and land use designations, as evaluated in the OVOV EIR and approved by the County.

The proposed Entrada South and VCC Project reflects limited changes and refinements to the development of the Entrada and VCC Planning Areas, as compared to what was evaluated in the State-certified EIR. As such, the Entrada South and VCC Project is referred to herein as the "Modified Project." A Supplemental EIR will be prepared by the County as the CEQA lead agency for the Modified Project. The Supplemental EIR will allow the County, as the CEQA lead agency, and other agencies as CEQA responsible agencies, to consider additional discretionary entitlements needed to complete development of the Entrada and VCC Planning Areas under the Modified Project.

The Modified Project includes enhanced environmental protections for each planning area, as discussed below. A summary of the Modified Project refinements to the balance of residential and non-residential development is shown in the following table and discussed below for each planning area.

<u>Land Use</u>	<u>2017 Approved Project</u>	<u>Modified Project</u>	<u>Difference</u>
<u>Entrada South</u>			
<u>Residential Units</u>	<u>1,725</u>	<u>1,574 (to comply with OVOV Area Plan)</u>	<u>- 151</u>
<u>Non-Residential</u>	<u>450,000 SF</u>	<u>730,000 SF</u>	<u>+ 280,000 SF</u>
<u>Valencia Planning Area</u>			
<u>Residential Units</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Non-Residential</u>	<u>3,400,000 SF</u>	<u>3,400,000 SF</u>	<u>0</u>

Under CEQA, when evaluating project changes relative to a previously certified EIR, the additional CEQA analysis shall focus solely on the incremental changes in the project, changes in circumstances, or new information since the certification of the prior EIR. (See, e.g., *Friends of the College of San Mateo Gardens v. San Mateo County Community College District* (2016) 1 Cal.4th 937, 949; *Benton v. Board of Supervisors* (1991) 226 Cal.App.3d 1467, 1482.) For purposes of this discussion, the "2017 Approved Project" refers to the resource management activities and development facilitated by the RMDP/SCP as approved by CDFW in 2017 for the Entrada and VCC Planning Areas.⁴

⁴ The Entrada and VCC Planning Areas were analyzed in the State-certified EIR as part of Alternative 2 (the proposed project). The final project approved by CDFW (i.e., the 2017 Approved Project) included additional environmental protections

The Modified Project is aimed at being a sustainable development that achieves net zero greenhouse gas emissions. As such, a part of the Project Description for the Modified Project includes applicable mitigation measures from the State-certified EIR, including 13 mitigation measures related to greenhouse gas impacts that reduce the Project's greenhouse gas emissions to net zero and are identical to those imposed on the 2017 Approved Project in accordance with the State-certified EIR. These mitigation measures went through extensive review and refinement as a part of the State-certified EIR, including review by the California Air Resources Board, the State authority on climate policy. These 13 mitigation measures are as follows:

Building Energy Efficiency

- **2-1:** Prior to the issuance of residential building permits for the project or a portion of the project, the project applicant or its designee shall submit one or more Zero Net Energy Confirmation (ZNE) Reports (ZNE Report) prepared by a qualified building energy efficiency and design consultant to Los Angeles County for review and confirmation that the residential development covered by the ZNE Report achieves the ZNE standard specified in this mitigation measure. Specifically, a ZNE Report shall demonstrate that the residential development within the RMDP/SCP project site subject to application of Title 24, Part 6, of the California Code of Regulations has been designed and shall be constructed to achieve ZNE, as defined by CEC in its 2015 Integrated Energy Policy Report, which requires the value of the net energy produced by project renewable energy resources to equal the value of the energy consumed annually by the project using the CEC's Time Dependent Valuation metric.

A ZNE Report shall provide, at a minimum, the following information:

- Confirmation that the residential development shall comply with Title 24, Part 6 building standards that are operative at the time of building permit application.
- Identification of additional measures or building performance standards that shall be relied upon to achieve the ZNE standard (as defined above), assuming ZNE is not already achieved by meeting the operative Title 24, Part 6 building standards.

In demonstrating that the residential development achieves the ZNE standard, the ZNE Report may:

- Evaluate multiple buildings and/or land use types. For example, a ZNE Report may cover all of the residential and non-residential buildings within a neighborhood/community, or a subset thereof, including an individual building.
- Rely upon aggregated or community-based strategies to support its determination that the subject buildings are designed to achieve ZNE. For example, shortfalls in renewable energy generation for one or more buildings may be offset with excess renewable generation from one or more other buildings. As such, a ZNE Report could determine a building is designed to achieve ZNE based on aggregated or community-based strategies even if the building on its own may not be designed to achieve ZNE.
- Make reasonable assumptions about the estimated electricity and natural gas loads and energy efficiencies of the subject buildings.

compared to Alternative 2 in portions of the project outside of the Entrada and VCC Planning Areas, but the final approval did not change the facilitated development within either of those two planning areas.

- If interconnection of the project’s renewable generation is not sufficient to allow compliance with the ZNE standard for the project, or a portion of the project, then Los Angeles County shall allow the project applicant or its designee to achieve an equivalent level of GHG emissions reductions to mitigate such shortfall by providing 5.1 metric tonnes carbon dioxide equivalents (MTCO₂e) of GHG reductions for every megawatt-hour of renewable energy generation that would have been needed to achieve the ZNE standard for the project, or a portion of the project, as demonstrated in the ZNE Report.
- **2-2:** Prior to the issuance of building permits for commercial development and private recreation centers, and prior to the commencement of construction for the public facilities, respectively, for the project or a portion of the project, the project applicant or its designee shall submit one or more Zero Net Energy Confirmation Reports (ZNE Report) prepared by a qualified building energy efficiency and design consultant to Los Angeles County for review and confirmation that the commercial development, private recreation centers, and/or public facilities covered by the ZNE Report achieve the ZNE standard specified in this mitigation measure. Specifically, a ZNE Report shall demonstrate that the commercial development, private recreation centers, and public facilities within the RMDP/SCP project site subject to application of Title 24, Part 6, of the California Code of Regulations have been designed and shall be constructed to achieve ZNE, as defined by CEC in its 2015 Integrated Energy Policy Report, which requires the value of the net energy produced by project renewable energy resources to equal the value of the energy consumed annually by the project using the CEC’s Time Dependent Valuation metric.

A ZNE Report shall provide, at a minimum, the following information:

- Confirmation that the commercial development, private recreation centers, and/or public facilities shall comply with Title 24, Part 6 building standards that are operative at the time of building permit application.
- Identification of additional measures or building performance standards that shall be relied upon to achieve the ZNE standard (as defined above), assuming ZNE is not already achieved by meeting the operative Title 24, Part 6 building standards.

In demonstrating that the commercial development, private recreation centers, and/or public facilities achieves the ZNE standard, the ZNE Report may:

- Evaluate multiple buildings and/or land use types. For example, a ZNE Report may cover all of the residential and non-residential buildings within a neighborhood/community, or a subset thereof, including an individual building.
- Rely upon aggregated or community-based strategies to support its determination that the subject buildings are designed to achieve ZNE. For example, short falls in renewable energy generation for one or more buildings may be offset with excess renewable generation from one or more other buildings. As such, a ZNE Report could determine a building is designed to achieve ZNE based on aggregated or community-based strategies even if the building on its own may not be designed to achieve ZNE.
- Make reasonable assumptions about the estimated electricity and natural gas loads and energy efficiencies of the subject buildings.

- If interconnection of the project’s renewable generation is not sufficient to allow compliance with the ZNE standard for the project, or a portion of the project, then Los Angeles County shall allow the project applicant or its designee to achieve an equivalent level of GHG emissions reductions to mitigate such shortfall by providing 5.1 MTCO₂e of GHG reductions for every megawatt-hour of renewable energy generation that would have been needed to achieve the ZNE standard for the project, or a portion of the project, as demonstrated in the ZNE Report.
- **2-3:** Prior to the issuance of private recreation center building permits, the project applicant or its designee shall submit swimming pool heating design plans to Los Angeles County for review and approval. The design plans shall demonstrate that all swimming pools located at private recreation centers on the RMDP/SCP project site have been designed and shall be constructed to use solar water heating or other technology with an equivalent level of energy efficiency.

Mobile Sources

- **2-4:** Prior to the issuance of residential building permits, the project applicant or its designee shall submit building design plans, to Los Angeles County for review and approval, which demonstrate that each residence within the RMDP/SCP project site subject to application of Title 24, Part 6, of the California Code of Regulations shall be equipped with a minimum of one single-port electric vehicle (EV) charging station. Each charging station shall achieve a similar or better functionality as a Level 2 charging station.

Additionally, prior to the issuance of the first building permit for the RMDP/SCP project site, the project applicant or its designee shall establish and fund a dedicated account for the provision of subsidies for the purchase of zero emission vehicles (ZEVs), as defined by CARB. The project applicant or its designee shall provide proof of the account’s establishment and funding to Los Angeles County.

The dedicated account shall be incrementally funded, for each village-level project, in an amount that equals the provision of a \$1,000 subsidy per residence—on a first come, first-served basis—for 65 percent of the village’s total residences subject to application of Title 24, Part 6, of the California Code of Regulations.

- **2-5:** Prior to the issuance of commercial building permits, the project applicant or its designee shall submit building design plans, to Los Angeles County, which demonstrate that the parking areas for commercial buildings on the RMDP/SCP project site shall be equipped with electric vehicle (EV) charging stations that provide charging opportunities to 7.5 percent of the total number of required parking spaces. (“Commercial buildings” include retail, light industrial, office, hotel, and mixed-use buildings.)

The EV charging stations shall achieve a similar or better functionality as a Level 2 charging station. In the event that the installed charging stations use functionality/technology other than Level 2 charging stations, the parameters of the mitigation obligation (i.e., number of parking spaces served by EV charging stations) shall reflect the comparative equivalency of Level 2 charging stations to the installed charging stations on the basis of average charge rate per hour. For purposes of this equivalency demonstration, Level 2 charging stations shall be assumed to provide charging capabilities of 25 range miles per hour.

- **2-6:** The project applicant-submitted Newhall Ranch Transportation Demand Management (TDM) Plan, located in Final AEA Appendix 7, shall be implemented to reduce vehicle miles traveled (VMT) resulting from project build out with oversight from Los Angeles County. The TDM Plan is designed to influence the transportation choices of residents, students, employees, and visitors, and serves to enhance the use of alternative transportation modes both on and off the project site through the provision of incentives and subsidies, expanded transit opportunities, bikeshare and carshare programs, technology-based programs, and other innovative means. Village-level implementation of relevant elements of the TDM Plan shall proceed in accordance with village-level applicability supplements prepared by a qualified transportation engineer that are reviewed and considered by Los Angeles County when approving tentative subdivision maps for land developments that are part of the project.

Accordingly, the TDM Plan identifies key implementation actions that are critical to the effectiveness of the VMT-reducing strategies, as well as timeline and phasing requirements, monitoring standards, and performance metrics and targets tailored to each of the strategies.

In accordance with the TDM Plan, a non-profit Transportation Management Organization (TMO) or equivalent management entity shall be established to provide the services required, as applicable.

- **2-7:** Prior to the issuance of traffic signal permits, the project applicant or its designee shall work with Los Angeles County and the California Department of Transportation (Caltrans), as applicable, to facilitate traffic signal coordination along:
 1. State Route 126 from the Los Angeles County line to the Interstate 5 north-bound ramps;
 2. Chiquito Canyon Road, Long Canyon Road, and Valencia Boulevard within the RMDP/SCP Project site;
 3. Magic Mountain Parkway from Long Canyon Road to the Interstate 5 north-bound ramps; and,
 4. Commerce Center Drive from Franklin Parkway to Magic Mountain Parkway.

To effectuate the signal synchronization and specifically the operational and timing adjustments needed at affected traffic signals, the project applicant or its designee shall submit traffic signal plans for review and approval, and/or pay needed fees as determined by Los Angeles County or Caltrans, as applicable.

A majority of the signals that will be synchronized will be new signals constructed/installed by the project. Thus, for these signals, the project will provide the necessary equipment at the signal controller cabinet, as well as within the new roadways themselves, to enable and facilitate synchronization. The project is responsible for paying 100 percent of the applicable fee amount for the signal synchronization work, with assurance that the necessary funding will be available to fully implement this measure.

- **2-8:** Consistent with the parameters of the Newhall Ranch TDM Plan, the project applicant or its designee shall provide Los Angeles County with proof that funding has been provided for the purchase, operation and maintenance of zero emission school buses in furtherance of the school bus program identified in the project's TDM Plan. The proof of funding shall be demonstrated

incrementally as the school bus program is paced to village-level occupancy and student enrollment levels.

- 2-9: Prior to the issuance of the first 2,000th residential building permit within the RMDP/SCP project site and every 2,000th residential building permit thereafter, the project applicant or its designee shall provide Los Angeles County with proof that it has provided a subsidy of \$100,000 per bus for the replacement of up to 10 diesel or compressed natural gas transit buses with zero emission buses to the identified transit provider(s).

Construction Sources

- 2-10: Prior to issuing grading permits for village-level development within the RMDP/SCP project site, Los Angeles County shall confirm that the project applicant or its designee shall fully mitigate the construction and vegetation change GHG emissions associated with each such grading permit (the “Incremental Construction GHG Emissions”) by relying upon one of the following compliance options, or a combination thereof, in accordance with the project applicant-submitted Newhall Ranch GHG Reduction Plan (GHG Reduction Plan; see Final AEA Appendix 6):
 - Directly undertake or fund activities that reduce or sequester GHG emissions (“Direct Reduction Activities”) and retire the associated “GHG Mitigation Credits” in a quantity equal to the Incremental Construction GHG Emissions. A “GHG Mitigation Credit” shall mean an instrument issued by an Approved Registry that satisfies the performance standards set forth in the GHG Reduction Plan and shall represent the estimated reduction or sequestration of one metric tonne of carbon dioxide equivalent that will be achieved by a Direct Reduction Activity that is not otherwise required (California Environmental Quality Act [CEQA] Guidelines Section 15126.4(c)(3)). An “Approved Registry” is an accredited carbon registry as defined by the GHG Reduction Plan; or
 - Obtain and retire “Carbon Offsets” in a quantity equal to the Incremental Construction GHG Emissions. “Carbon Offset” shall mean an instrument issued by an Approved Registry that satisfies the performance standards set forth in the GHG Reduction Plan and shall represent the past reduction or sequestration of one metric tonne of carbon dioxide equivalent achieved by a Direct Reduction Activity or any other GHG emission reduction project or activity that is not otherwise required (CEQA Guidelines Section 15126.4(c)(3)).

Local and Off-Site Mitigation

- 2-11: Prior to the issuance of building permits for development within the RMDP/SCP project site, the project applicant or its designee shall undertake or fund Direct Reduction Activities pursuant to the Building Retrofit Program (“Retrofit Program”), as included in Final AEA Appendix 13 to improve the energy efficiency of existing buildings located primarily in disadvantaged communities (as defined in the Retrofit Program). The project applicant or its designee shall retire GHG Mitigation Credits or Carbon Offsets issued by an Approved Registry based on such Direct Reduction Activities in a quantity equal to the sum of the following (together, the “Retrofit Reduction Requirement”) as included in Final AEA Appendix 13:
 - For the residential portion of a building permit application, the product of the planned number of residential units for the village-level project multiplied by 0.0377 MTCO₂e;

- For the commercial portion of a building permit application, the product of the planned commercial development per thousand commercial square feet multiplied by 0.0215 MTCO₂e. (“Commercial development” includes retail, light industrial, office, hotel and mixed-use buildings.)

Building retrofits covered by the Retrofit Program can include, but are not limited to: cool roofs, solar panels, solar water heaters, smart meters, energy efficient lighting (including, but not limited to, light bulb replacement), energy efficient appliances, energy efficient windows, pool covers, insulation, and water conservation measures.

The Retrofit Program shall be implemented within the geographic area defined to include Los Angeles County and primarily within disadvantaged communities, as defined by the Retrofit Program, or in other areas accepted by the Los Angeles County Planning Director.

- **2-12:** Prior to the issuance of the first building permit for the RMDP/SCP project site, the project applicant or its designee shall provide Los Angeles County with proof of installation of EV charging stations capable of serving 20 off-site parking spaces. Thereafter, the project applicant or its designee shall provide Los Angeles County proof of installation of EV charging stations prior to the issuance of residential and commercial building permits per the following ratios: one (1) off-site parking space shall be served by an electric vehicle charging station for every 30 dwelling units, and one (1) off-site parking space shall be served by an electric vehicle charging station for every 7,000 square feet of commercial development. (“Commercial development” includes retail, light industrial, office, hotel and mixed-use buildings.) Off-site EV charging stations capable of servicing 2,036 parking spaces would be required if the maximum allowable development facilitated by the RMDP/SCP project occurs; fewer EV charging stations would be required if maximum build-out under the RMDP/SCP project does not occur.

The EV charging stations shall achieve a similar or better functionality as a Level 2 charging station and may service one or more parking spaces. In the event that the installed charging stations use functionality/technology other than Level 2 charging stations, the parameters of the mitigation obligation (i.e., number of parking spaces served by EV charging stations) shall reflect the comparative equivalency of Level 2 charging stations to the installed charging stations on the basis of average charge rate per hour. For purposes of this equivalency demonstration, Level 2 charging stations shall be assumed to provide charging capabilities of 25 range miles per hour.

The EV charging stations shall be located within the geographic area defined to include Los Angeles County. The EV charging stations shall be in areas that are generally accessible to the public, such as areas that include, but are not limited to, retail centers, employment centers and office complexes, recreational facilities, schools, and other categories of public facilities.

- **2-13:** In addition to Mitigation Measures 2-1 through 2-12, the project applicant or its designee shall offset GHG emissions to zero by funding or undertaking Direct Reduction Activities or, if necessary, obtaining Carbon Offsets through the Newhall Ranch GHG Reduction Plan. The project applicant-submitted Newhall Ranch GHG Reduction Plan focuses on achieving GHG reductions or sequestration through the Direct Reduction Activities in coordination with an Approved Registry, such as the Climate Action Reserve. If these Direct Reduction Activities do not achieve the necessary amount of GHG reductions, the project applicant or its designee can obtain Carbon Offsets issued by an Approved Registry.

Prior to issuing building permits for development within the RMDP/SCP project site, Los Angeles County shall confirm that the project applicant or its designee shall fully offset the

project's remaining (i.e., post implementation of Mitigation Measures 2-1 through 2-12) operational GHG emissions over the 30-year project life associated with each such building permit (the "Incremental Operational GHG Emissions") by relying upon one of the following compliance options, or a combination thereof, in accordance with the Newhall Ranch GHG Reduction Plan:

- Undertake or fund Direct Reduction Activities that are estimated to result in GHG Mitigation Credits, as described in the GHG Reduction Plan, and retire such GHG Mitigation Credits in a quantity equal to the Incremental Operational GHG Emissions;
- Undertake or fund Direct Reduction Activities and retire the Carbon Offsets in a quantity equal to the Incremental Operational GHG Emissions; or
- If necessary, as determined by the Los Angeles County Planning Director in accordance with the GHG Reduction Plan, to fully offset Incremental Operational GHG Emissions, the project applicant or its designee may purchase and retire Carbon Offsets that have been issued by an Approved Registry in a quantity equal to the Incremental Operational GHG Emissions.

Compliance with Mitigation Measure (MM) 2-13 shall be demonstrated incrementally prior to obtaining building permits.

The incremental Operational GHG Emissions shall be equal to the sum of (1) the number of proposed residential units covered by the applicable building permit multiplied by a "GHG Residential Ratio" and (2) every thousand square feet of proposed commercial development covered by the applicable building permit multiplied by a "GHG Commercial Ratio." ("Commercial development" includes retail, light industrial, office, hotel, and mixed-use buildings.) GHG Residential Ratio and GHG Commercial Ratio shall mean the emissions ratios in MTCO₂e set forth in the applicable CEQA analysis completed by the County of Los Angeles for a specific village-level project to ensure that the related GHG emissions are reduced to zero.

Further discussion of these mitigation measures is included in **Section 8, Greenhouse Gas Emissions**, of this Initial Study, as well as Appendix IS-1 and the GHG and Energy Memo provided in Appendix IS-2.

Entrada Planning Area

The proposed changes and refinements under the Modified Project, as compared to the 2017 Approved Project analyzed in the State-certified EIR, include:

Enhanced Environmental Protections

The Modified Project increases environmental protections to wetlands and related biological resources within the Entrada Planning Area. The Modified Project enhances and restores portions of a drainage channel referred to as Unnamed Canyon 2. With the proposed design refinements, portions of Unnamed Canyon 2—from the storm drain outlet at the southern Entrada boundary to Magic Mountain Parkway—would be enhanced and restored as a natural, open, vegetated drainage channel with grade control structures that would generally retain the look and feel of a natural drainage, thus reducing permanent impacts to biological resources and jurisdictional waters and providing additional open space within the developed portions of the Project Site. This environmentally beneficial modification would result in increased open

space, restored drainage areas, and habitat for species as compared to that evaluated in the State-certified EIR.⁵

Refinements to the Balance of Residential and Non-Residential Development

The State-certified EIR for the 2017 Approved Project evaluated the environmental impacts of 1,725 dwelling units, 450,000 square feet of non-residential development, a public facilities area for a neighborhood park and a potential school site, private recreational amenities, a spineflower preserve, and trails and infrastructure within the Entrada Planning Area. The Modified Project includes 1,574 dwelling units (including affordable housing units consistent with the County's Inclusionary Housing Ordinance or a potential Development Agreement, discussed below), 730,000 square feet of non-residential development, a neighborhood park and potential school site, a spineflower preserve, and trails and infrastructure within the Entrada Planning Area.⁶ The refinements to the land use plan for Entrada South ensure consistency with the density of residential units allowed under the OVOV Area Plan land use designation for Entrada South. As such, this analysis considers the environmental implications of reducing the number of residences by 151 units and increasing the amount of non-residential development by 280,000 square feet. These refinements do not substantially change the scope of the Entrada South land use plan when comparing the Modified Project to the 2017 Approved Project. Non-residential development could include any allowable uses consistent with the zoning designation, including but not limited to commercial, office, retail, and hotel uses. If a school site is not ultimately needed in Entrada South, that area would become available for residential development provided the overall number of allowable units (1,574 dwelling units) is not exceeded. Potential adjustments to school district boundaries may occur based on estimated student populations and discussions with the relevant school districts. The Conceptual Land Use Plan for the Entrada Planning Area is shown in **Figure 3.3, Conceptual Land Use Plan—Entrada South**, on page 19.

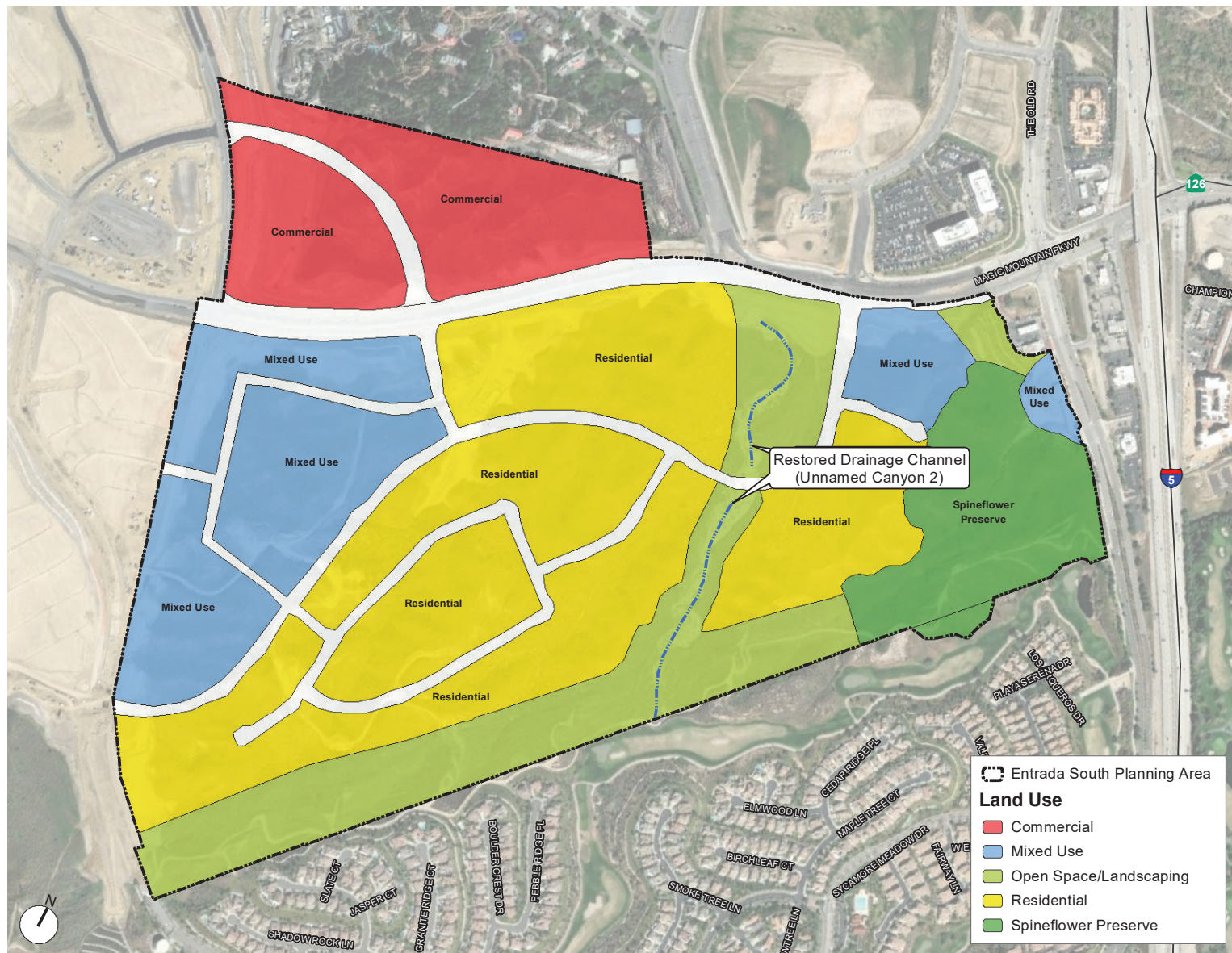
Zone Change

The Modified Project includes a zone change for the portion of the Entrada Planning Area located south of Magic Mountain Parkway from R-1 to MXD, Mixed-Use Development Zone. Consistent with County Code Section 22.26.030, the MXD zone allows for a mixture of residential, commercial, and limited light industrial uses and buildings. The MXD zone integrates a wide range of housing densities with community-serving commercial uses to serve local residents, employees, pedestrians, and consumers.

The County and the applicant may consider a Development Agreement in accordance with Government Code Section 65864 *et seq.* as part of the Modified Project. The Development Agreement would not increase the level of development or the disturbance footprint of the Modified Project. The Development Agreement may establish commitments by the applicant to provide additional environmental benefits, such as an updated affordable housing program. The Supplemental EIR will address the Development Agreement as a discretionary entitlement, if applicable.

⁵ As part of the Modified Project's environmental enhancements within Entrada South, temporary disturbance of a 0.6-acre previously-disturbed golf course area within The Oaks Club at Valencia golf course, which is located off-site and immediately south of Entrada South within the Westridge community, is required to accommodate a necessary storm drain connection. This previously-disturbed golf course area would experience temporary impacts during a brief construction period and would be revegetated and restored as a portion of the golf course following completion of the storm drain connection associated with Unnamed Canyon 2.

⁶ A density bonus may be available under state law and the County Code based on the provision of affordable housing.



VCC Planning Area

As relevant background, VCC was approved for development by Los Angeles County through the issuance of various entitlements and certification of an EIR (SCH No. 1987-123005) in 1991 (referred to herein as the County-certified VCC EIR), which is incorporated by reference. The existing VCC entitlement approved by the County allows approximately 12.6 million square feet of industrial/business park space at build-out, of which approximately 9 million square feet has been constructed. The VCC Planning Area evaluated herein as part of the Modified Project is comprised of approximately 3.4 million square feet of industrial/business park space within the County-approved and partially completed VCC industrial/business park center. Following the County-certified VCC EIR, development of the undeveloped portion of the VCC Planning Area was also analyzed in the State-certified EIR, with up to 3.4 million square feet of non-residential development that would be facilitated by the RMDP/SCP. Under the Modified Project and consistent with the State-certified EIR, the VCC Planning Area would be developed consistent with the uses allowed by the County-approved VCC entitlements and existing zoning. Thus, the Modified Project does not propose any new or additional buildout of the VCC Planning Area beyond what was analyzed in the State-certified EIR, and the Modified Project does not result in any buildout of VCC beyond the County-approved existing VCC entitlements, as summarized in the table below.

<u>Valencia Commerce Center (VCC)</u>	<u>Million Square Feet</u>
<u>County's Prior Approval of VCC</u>	<u>12.6</u>
<u>Existing Buildout of VCC (Previously Constructed)</u>	<u>9.0</u>
<u>Remaining Buildout of VCC Not Included in Modified Project</u>	<u>0.2</u>
<u>Remaining Buildout of VCC Planning Area Resulting From the Modified Project (Consistent with the 2017 Approved Project as Analyzed in the State-certified EIR)</u>	<u>3.4</u>
<u>Additional Buildout of the VCC Planning Area Beyond the County's Prior Approval of VCC</u>	<u>0</u>

The Conceptual Land Use Plan for the VCC Planning Area is shown in **Figure 4.3**, Conceptual Land Use Plan—VCC Planning Area, on page 21. As discussed above, the County and the applicant may ultimately enter into a Development Agreement as part of the Modified Project which may establish commitments by the applicant to provide additional environmental benefits. The Supplemental EIR will address the Development Agreement as a discretionary entitlement, if applicable.

The proposed changes and refinements under the Modified Project, as compared to the 2017 Approved Project analyzed in the State-certified EIR, include:

Enhanced Environmental Protections

To provide increased environmental protections to wetlands and related biological resources within the VCC Planning Area, the Modified Project involves a reduction in permanent impacts to Hasley Creek and Castaic Creek (such areas may be temporarily impacted during construction, as analyzed in the State-certified EIR, but would be restored and revegetated after construction based on the Modified Project design) which traverse the VCC Planning Area, including a reduction of permanent impacts to certain vegetation communities and jurisdictional stream habitat. This environmentally beneficial modification would result in increased open space, restored drainage areas, and habitat for species.



Figure 4.3
Conceptual Land Use Plan – VCC Planning Area

Surrounding Land Uses and Setting:

Entrada Planning Area: Immediately north of the Entrada Planning Area are Six Flags Magic Mountain and the proposed Entrada North community. The existing unincorporated community of Westridge is located to the immediate south. In addition, the City of Santa Clarita is located to the east and is separated from the Entrada Planning Area by The Old Road and I-5. Finally, planned development within the Newhall Ranch Specific Plan area is located to the west. The approved Mission Village community within the Newhall Ranch Specific Plan area, which has been under development since the end of 2017, is located immediately west of the Site. Additionally, the proposed Legacy Village community is located to the southwest.

VCC Planning Area: VCC is surrounded by existing single-family residential and industrial uses to the north. Existing industrial uses, The Old Road and the I-5 Freeway are located to the east. Henry Mayo Drive (SR-126) and the proposed Entrada North community are located to the south. To the west is the Chiquita Canyon Landfill.

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.?

Yes, tribal consultation will be conducted in accordance with AB 52.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

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

Public Agency

Approval Required

Entrada Planning Area:

County of Los Angeles

Zone Change

County of Los Angeles

Vesting Tentative Tract Map

County of Los Angeles

Conditional Use Permit

County of Los Angeles

Affordable Housing Permit

County of Los Angeles

Oak Tree Permit

County of Los Angeles

Parking Permit

County of Los Angeles

Development Agreement

County of Los Angeles

Other approvals, as needed, ministerial or otherwise, which the County has determined are necessary

CDFW

Streambed Alteration Agreement

Los Angeles RWQCB

Section 401 Certification or Waste Discharge Requirements

U.S. Army Corps

Section 404 Permit

Others TBD

Other approvals from responsible agencies

Public Agency

VCC Planning Area:

County of Los Angeles
County of Los Angeles
County of Los Angeles
County of Los Angeles
County of Los Angeles

CDFW

Los Angeles RWQCB

U.S. Army Corps

Others TBD

Approval Required

Tentative Parcel Map

Oak Tree Permit

Parking Permit

Development Agreement

Other approvals, as needed, ministerial or otherwise, which the County has determined are necessary

Streambed Alteration Agreement

Section 401 Certification

Section 404 Permit

Other approvals from responsible agencies

Major projects in the area:

Project/ Case No.

R2013-02833-(5)

TR060678-(5)

00-196-(5)

TR061996-(5)

04-181-(5)

R2013-01790-(5)

TR52584

R2015-00408-(5)

TR072126

Description and Status

Entrada North (VTM 071377)

Homestead North (VTM—Newhall Ranch Specific Plan area)

Homestead South (VTM 060678—Newhall Ranch Specific Plan area)

Landmark Village (VTM 53108—Newhall Ranch Specific Plan area)

Legacy Village (VTM 061996—Stevenson Ranch area)

Mission Village (VTM 061105—Newhall Ranch Specific Plan area)

Potrero Village (VTM 061911—Newhall Ranch Specific Plan area)

Los Valles Residential Development Project

Northlake Specific Plan Project

Tapia Ranch Project

Reviewing Agencies:*Responsible Agencies*

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

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)

Special Reviewing Agencies

- ☐ None
☒ Santa Monica Mountains
Conservancy
☐ National Parks
☐ National Forest
☐ Edwards Air Force Base
☐ Resource Conservation
District of Santa Monica
Mountains Area
☐

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
☐

Regional Significance

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

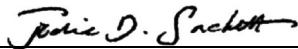
The environmental factors checked below would be potentially significant impacts affected by this project.

- | | | |
|--|---|--|
| <input 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 checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Transportation |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Land Use/Planning | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input checked="" 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)

September 30, 2021

Date



Signature (Approved by)

September 30, 2021

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 significant. Sources of thresholds include the County General Plan, other County planning documents, and County ordinances. Some thresholds are unique to geographical locations.

Analysis Preface: *The analysis that follows supports the preparation of a Supplemental Environmental Impact Report for the Entrada South and Valencia Commerce Center Project, which supplements the State-certified EIR (SCH No. 2000011025) for the RMDP/SCP, which was approved by the California Department of Fish and Wildlife in 2017. This analysis focuses on the Modified Project, specifically, the changes and refinements to the development proposed within Entrada South and VCC, as compared to the analysis of the Entrada and VCC Planning Areas in the State-certified EIR. The discussion for each environmental topic begins with a summary of the State-certified EIR analysis and follows with a discussion of the potential comparative impacts associated with the Modified Project. The State-certified EIR is available for public review and inspection on the County of Los Angeles Department of Regional Planning website at <https://planning.lacounty.gov/case/view/rmdp> and at the following public libraries: Valencia Library, Castaic Library, Stevenson Ranch Library, Old Town Newhall Library, and Canyon Country Jo Anne Darcy Library. The analysis for each Initial Study checklist question below addresses whether the changes associated with the Modified Project require further analysis of the environmental issue in the Supplemental EIR. For those issues fully addressed herein and scoped out of further analysis in the Supplemental EIR, a list of project design features as well as any applicable mitigation measures, including those previously adopted as part of the State-certified EIR and/or the County-certified VCC EIR, is provided in Appendix IS-1 of this Initial Study.*

1. AESTHETICS

Summary of State-Certified EIR Analysis of Aesthetics

Section 4.15, Visual Resources, of the State-certified EIR analyzed impacts to aesthetics resulting from the development of the Entrada and VCC Planning Areas, as summarized below. The State-certified EIR found that no roadways in the vicinity of either the Entrada or VCC Planning Areas were classified as a state scenic highway.⁷ According to the California Scenic Highway Mapping System of the California Department of Transportation, neither planning area is located on or near a major state-designated scenic highway. SR-126 is the nearest eligible state scenic highway, but it is not officially designated.

Entrada Planning Area

The State-certified EIR determined that development of the Entrada Planning Area would result in an urban-density, mixed-use residential and commercial development in an area with a baseline condition that was predominately undeveloped. Given its location relative to the viewing audience along the I-5 corridor, the Entrada development would be visible from the travel corridor and from other locations throughout the area. The development of new urban uses would result in the conversion of an existing undeveloped area to a developed condition, which would result in substantial change to the existing visual character relative to baseline conditions. New sources of light and glare would be installed on the otherwise vacant site, contributing to an increase in nighttime lighting in the project region. Thus, the State-certified EIR concluded that the Entrada Planning Area development had the potential to result in significant visual impacts. Specifically, impacts with regard to views (scenic vistas), aesthetics (visual character), and light and glare were determined to be significant.⁸

Mitigation Measures RMDP/SCP-VR-1 and RMDP/SCP-VR-2 from the State-certified EIR apply to the Entrada Planning Area. Even with the implementation of mitigation, the State-certified EIR concluded that impacts to views (scenic vistas), aesthetics (visual character), and light and glare would be significant and unavoidable.

VCC Planning Area

The State-certified EIR acknowledged that development of the VCC Planning Area would result in additional commercial uses within portions of the Valencia Commerce Center previously approved for development by the County in 1991. However, build-out of the remainder of VCC would be visually compatible with the previously developed portions of VCC; specifically, buildings similar in size and design would be constructed on the undeveloped portions of VCC. Accordingly, the State-certified EIR determined that buildout of the VCC with implementation of previously adopted Mitigation Measures VCC-VR-1 through VCC-VR-19 would not result in significant impacts.⁹

Project Design Features of the Modified Project (Entrada and VCC Planning Areas)

The Modified Project includes the following project design features relevant to aesthetic resources to provide additional environmental benefits within the Entrada and VCC Planning Areas:

⁷ See State-certified EIR, page 4.15-14.

⁸ See State-certified EIR, page 4.15-54.

⁹ See State-certified EIR, page 4.15-54.

- PDF-VR-1: During construction, temporary green screen construction fencing 6 feet tall shall be placed on-site adjacent to public roadways to screen much of the construction activity from view at street level.
- PDF-VR-2: During construction, all security lighting shall be properly shielded and projected downwards such that light is focused on construction equipment or materials and not on adjacent roadways or off-site areas.
- PDF-VR-3: Prior to issuance of a building permit, the Project Applicant shall submit Design Guidelines to the County of Los Angeles Department of Regional Planning. The Design Guidelines shall address such issues as site planning, architecture, walls and fencing, landscape design, lighting, signage, and general design themes for each of the major land use categories in the community. In particular, the Design Guidelines shall establish the following:
 - Major utility systems, including potable water, recycled water, wastewater, electricity, natural gas, and cable/internet, shall be placed underground.
 - Utility/service areas shall be treated (i.e., through the use of color, landscaping, screening, etc.) to minimize visual impact.
 - Rooftop equipment shall be screened from view from public streets.
 - Outdoor lighting within the Project Site shall be projected downwards to illuminate the intended surface and minimize light spillover and glare generation; and shall consist of low-intensity downlight or be equipped with louvers, shields, hoods, or other screening devices, as appropriate.
 - Only non-reflective or low-reflective building materials, or those treated with a standard non-reflective or low-reflective glazing, shall be used on building exteriors.

Evaluation of Aesthetic Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
Except as provided in Public Resources Code Section 21099, would the project:			
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

A scenic vista, as defined by the California Department of Transportation, is a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. A significant impact would occur if the Modified Project would have a substantial adverse effect on a scenic vista. A focal view includes a notable object, building, setting, or feature of visual interest, as opposed to a panoramic views or vistas which cover a large geographic area for which the view may be wide and extend into the distance. Diminishment of a scenic vista would occur if the bulk or design of a building or overall development blocks, obscures, or contrasts enough with a visually interesting view or view of a visual resource such that the quality of the view is permanently affected.

Entrada Planning Area

The boundaries of the Entrada Planning Area under the Modified Project fall within the disturbance footprint analyzed in the State-certified EIR, with the exception of the 0.6-acre previously disturbed golf course area on The Oaks Club at Valencia golf course, which will be temporarily disturbed to allow for a storm drain connection and fully restored following construction. The Modified Project would not increase the general scope and intensity of development that was studied in the State-certified EIR and would result in a slight reduction in overall floor area.¹⁰ Moreover, as discussed above under the heading “Enhanced Environmental Protections” for the Entrada Planning Area, the Modified Project would reduce the impacts to aesthetic resources further by preserving additional open space and habitat through the avoidance of permanent impacts to Unnamed Canyon 2.

With respect to development within the Entrada Planning Area, the State-certified EIR determined impacts to scenic vistas would be significant and unavoidable due to the conversion of an existing open area to a developed condition.¹¹ The Modified Project would not increase the general scope and intensity of development that was studied in the State-certified EIR and would result in a slight reduction in overall floor area. Moreover, the Modified Project would reduce the impacts to aesthetic resources further by preserving additional open space and habitat through the avoidance of permanent impacts to Unnamed Canyon 2. The Modified Project is consistent with the 2017 Approved Project in terms of overall development footprint, general land uses, and building scale and design. As a result, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. The mitigation measures set forth in Appendix IS-1 of this Initial Study would continue to apply and will be incorporated into the Mitigation Monitoring and Reporting Program (MMRP) for the Modified Project. As such, no additional analysis in the Supplemental EIR is required.

In addition, the proposed project design measures would provide additional environmental benefits for the Modified Project. Per PDF-VR-3, Design Guidelines would be developed to guide site planning, architecture, walls and fencing, landscape design, lighting, signage, and general design themes to further support a high-quality environment. The Design Guidelines would be consistent with similar design guidelines completed as part of the Mission Village project. Construction-related impacts likewise would be reduced through implementation of PDF-VR-1 and PDF-VR-2, which would require the installation of green screen construction fencing and security lighting that is projected downwards. PDF-VR-1, PDF-VR-2 and PDF-VR-3 are environmentally beneficial and are not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

VCC Planning Area

The Modified Project development proposed within the VCC Planning Area would be consistent in terms of land use, floor area, and general scope and intensity with that evaluated in the State-certified EIR, and applicable mitigation outlined therein would be implemented. The boundaries of the VCC Planning Area

¹⁰ The 2017 Approved Project includes 1,725 dwelling units (estimated to comprise 3,235,100 square feet) plus 450,000 square feet of non-residential development within the Entrada Planning Area, while the Modified Project includes 1,574 dwelling units (estimated at 2,951,913 square feet) and 730,000 square feet of non-residential development. As such, this analysis considers the environmental implications of reducing the number of residences by 151 units and increasing the amount of non-residential development by 280,000 square feet, for a net reduction of roughly 3,187 square feet compared to the Entrada development evaluated in the State-certified EIR.

¹¹ See State-certified EIR, page 4.15-54.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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under the Modified Project also fall within the disturbance footprint analyzed in the State-certified EIR. Moreover, the Modified Project would reduce impacts to aesthetic resources by preserving additional open space and habitat through the avoidance of permanent impacts to Hasley Creek and Castaic Creek.

Accordingly, development of the Modified Project in the VCC Planning Area would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. As determined in the State-certified EIR, impacts to scenic vistas resulting from VCC development would be less than significant because as compared with existing conditions, build-out of the remainder of the VCC would be visually compatible with the portion of the project already constructed.¹² Nonetheless, Mitigation Measures VCC-VR-1 through VCC-VR-19 previously adopted by the County would be implemented; these measures and related project design features are detailed in Appendix IS-1 of this Initial Study and will be incorporated into the MMRP for the Modified Project. No additional analysis in the Supplemental EIR is required.

In addition, the project design measures would provide environmental benefits for the Modified Project. Per PDF-VR-3, Design Guidelines would be developed to guide site planning, architecture, walls and fencing, landscape design, lighting, signage, and general design themes to further support a high-quality environment. Construction-related impacts likewise would be reduced through implementation of PDF-VR-1 and PDF-VR-2, which would require the installation of green screen construction fencing and security lighting that is projected downwards. PDF-VR-1, PDF-VR-2 and PDF-VR-3 are environmentally beneficial and are not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

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

☐
☒
☐

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

As discussed in Response to Question 1.a, the Modified Project would not increase the changes in visual character or quality of public views of the site, including views from nearby regional trails, beyond what was previously analyzed in the State-certified EIR.

Entrada and VCC Planning Areas¹³

Like the 2017 Approved Project, development associated with the Modified Project would be visible from regional trails in the area. Given that development under the Modified Project would be substantially similar to that contemplated as part of the 2017 Approved Project, including in terms of the overall development footprint, general land uses, and building scale and design, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. The project design features and mitigation measures set forth in Appendix IS-1 of this Initial Study would continue to apply and will be incorporated into the MMRP for the Modified Project. As a result, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area.

In addition, the proposed project design measures would provide additional environmental benefits

¹² See State-certified EIR, 4.15-54.

¹³ Where the Modified Project's impacts associated with both planning areas are similar or identical, the discussion of impacts may be combined to reduce redundancy.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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for the Modified Project. Per PDF-VR-3, Design Guidelines would be developed and would address site planning, architecture, walls and fencing, landscape design, lighting, signage, and general design themes to ensure a high-quality environment. Construction-related impacts likewise would be further reduced through implementation of PDF-VR-1 and PDF-VR-2, which would require the installation of green screen construction fencing and security lighting that is projected downwards. PDF-VR-1, PDF-VR-2 and PDF-VR-3 are environmentally beneficial and are not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

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

☐
☒
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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

As discussed above and indicated in the State-certified EIR, no roadway within the project vicinity is classified as a state scenic highway. In addition to SR-126, it is noted that I-5 from I-210 near Tunnel Station to SR-126 is also eligible as a state scenic highway, and both I-5 and SR-126 are designated as First Priority Scenic Routes in the County's Scenic Highway Element, indicating they are proposed for further study.¹⁴ These roadways offer focused and panoramic views of a variety of visual resources in the area, including the Santa Clara River, Castaic and Hasley Creeks, rolling hillsides, several significant ridgelines, distant mountain backdrops, and scattered stands of oak trees and other native vegetation. However, none of these roadways are officially designated as a state scenic highway.

Entrada Planning Area

The Modified Project would not increase impacts to scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway, as compared to the 2017 Approved Project because there is no roadway within the Modified Project area or its vicinity that is classified as a state scenic highway. The Modified Project would not increase landform modification, nor would it introduce new development and infrastructure as compared to the 2017 Approved Project. Additionally, the Modified Project would not increase grading on undeveloped hillsides and hilltops on-site, would not increase the filling in or channelization of the natural drainage courses on-site, and would not remove more existing native vegetation, including oak trees, than previously evaluated. Since the Modified Project would have a similar overall development footprint as the 2017 Approved Project, any impacts to scenic resources would be the same as disclosed in the State-certified EIR.

As determined in the State-certified EIR, there are no designated state scenic highways in the vicinity of the planning area. Based on the analysis above, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. No additional analysis in the Supplemental EIR is required.

VCC Planning Area

The Modified Project would not increase impacts to scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway, as compared to the 2017 Approved

¹⁴ County of Los Angeles General Plan Scenic Highway Element, Appendix A—Scenic Highway System Map Index, pp. SHA-1 through SHA-2, http://planning.lacounty.gov/assets/upl/project/gp_web80-scenic-highway-element.pdf, accessed May 11, 2021.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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Project because there is no roadway within the Modified Project area or its vicinity that is classified as a state scenic highway. Implementation of the Modified Project would not increase landform modification or new development and infrastructure beyond what was analyzed in the State-certified EIR. Consistent with the 2017 Approved Project, implementation the Modified Project would not increase the grading of undeveloped land. Portions of the natural drainage courses on-site would be modified, and existing native vegetation, including oak trees, would be removed. However, since the Modified Project would have a similar overall development footprint as the 2017 Approved Project, any impacts to scenic resources would be the same as disclosed in the State-certified EIR.

Therefore, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. As determined in the State-certified EIR, impacts would be less than significant. Nonetheless, Mitigation Measures VCC-VR-1 through VCC-VR-19 previously adopted by the County would be implemented (refer to Appendix IS-1 of this Initial Study). Based on the analysis above, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. No additional analysis in the Supplemental EIR is required.

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 and/or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from publicly accessible vantage points).

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
The Modified Project would not increase the changes in visual character or quality of public views of the site beyond what was previously analyzed in the State-certified EIR.

Entrada Planning Area

As indicated above, Modified Project development in the Entrada Planning Area would fall within the disturbance footprint analyzed in the State-certified EIR. In addition, proposed development under the Modified Project would be consistent in terms of land use, scale, and general location and design with that previously studied in the State-certified EIR. Moreover, the Modified Project would reduce slightly the impacts to aesthetic resources by preserving additional open space and habitat through avoidance of Unnamed Canyon 2.

As previously indicated, the State-certified EIR determined visual quality impacts within the Entrada Planning Area would be significant and unavoidable because the 2017 Approved Project would result in the conversion of an existing open area to a developed condition. However, as stated above, the Modified Project would not increase the general scope and intensity of development that was studied in the State-certified EIR and would result in a slight reduction in overall floor area. Moreover, the Modified Project would reduce the impacts to aesthetic resources further by preserving additional open space and habitat through the avoidance of permanent impacts to Unnamed Canyon 2. The Modified Project is consistent with the Approved Project in overall development footprint, general land uses, and building scale and design. As a result, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. In addition, Mitigation Measures

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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RMDP/SCP-VR-1 and RMDP/SCP-VR-2 from the State-certified EIR, which are set forth in Appendix IS-1 of this Initial Study and will be incorporated into the MMRP for the Modified Project, would be implemented. No additional analysis in the Supplemental EIR is required.

In addition, the proposed project design measures would provide additional environmental benefits for the Modified Project. Per PDF-VR-3, Design Guidelines would be developed and would address site planning, architecture, walls and fencing, landscape design, lighting, signage, and general design themes to further support a high-quality environment. PDF-VR-3 is environmentally beneficial and is not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

VCC Planning Area

The Modified Project would not increase impacts to the visual character or the quality of public views of and surrounding the VCC Planning Area compared to the analysis completed in the State-certified EIR. The Modified Project would fall within the disturbance footprint analyzed therein. Additionally, proposed development would be consistent in terms of land use, scale, and general location and design with that studied in the State-certified EIR. Moreover, the Modified Project would reduce slightly the impacts to aesthetic resources by preserving additional open space and habitat through avoidance of impacts to Hasley Creek and Castaic Creek.

As determined in the State-certified EIR, visual character impacts would be less than significant because build-out of the remainder of the VCC would be visually compatible with the portion of the project already constructed. The Modified Project, which consists of development of the same general scope and intensity as the 2017 Approved Project, would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. In addition, Mitigation Measures VCC-VR-1 through VCC-VR-19 previously adopted by the County would be implemented (refer to Appendix IS-1 of this Initial Study). No additional analysis in the Supplemental EIR is required.

In addition, the proposed project design measures would provide additional environmental benefits for the Modified Project. Per PDF-VR-3, Design Guidelines would be developed and would address site planning, architecture, walls and fencing, landscape design, lighting, signage, and general design themes to further support a high-quality environment. PDF-VR-3 is environmentally beneficial and is not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

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

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
The Modified Project would not generate shadows or add new light or glare sources beyond those evaluated in the State-certified EIR.

Entrada Planning Area

As previously discussed, the Modified Project would fall within the same development footprint as the 2017 Approved Project, and proposed development would be consistent in terms of land use, scale, and general location and design with that previously studied in the State-certified EIR.

<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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As determined in the State-certified EIR, impacts would be significant and unavoidable because new sources of light and glare would be installed on the vacant site, contributing to an increase in nighttime lighting in the Project region. However, as stated above, the Modified Project would not increase the general scope and intensity of development that was studied in the State-certified EIR and would result in a slight reduction in overall floor area. Moreover, the Modified Project would reduce the impacts to aesthetic resources further by preserving additional open space and habitat through the avoidance of permanent impacts to Unnamed Canyon 2. The Modified Project is consistent with the Approved Project in overall development footprint, general land uses, and building scale and design. As a result, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. The project design features and mitigation measures set forth in Appendix IS-1 of this Initial Study would continue to apply and will be incorporated into the MMRP for the Modified Project. No additional analysis in the Supplemental EIR is required.

Moreover, PDF-VR-1 and PDF-VR-2 would further reduce light and glare impacts during construction by requiring the installation of green screen construction fencing and security lighting that is projected downwards. Additionally, under PDF-VR-3, the Project Applicant would develop Design Guidelines that would address screening devices and low-reflective building exteriors. The inclusion of PDF-VR-1, PDF-VR-2 and PDF-VR-3 would provide additional environmental benefits for the Modified Project and are not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

VCC Planning Area

Modified Project development within the VCC Planning Area would not result in increased shading, light, or glare impacts compared to the 2017 Approved Project, as the development footprint and general scope and intensity of development would be consistent with that previously analyzed in the State-certified EIR.

As determined in the State-certified EIR, impacts would be less than significant. Nonetheless, Mitigation Measures VCC-VR-1 through VCC-VR-19 previously adopted by the County would be implemented (refer to Appendix IS-1 of this Initial Study). Based on the preceding analysis, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. No additional analysis in the Supplemental EIR is required.

Moreover, PDF-VR-1 and PDF-VR-2 would further reduce light and glare impacts during construction by requiring the installation of green screen construction fencing and security lighting that is projected downwards. Additionally, under PDF-VR-3, the Project Applicant would develop Design Guidelines that would address screening devices and low-reflective building exteriors. The inclusion of PDF-VR-1, PDF-VR-2 and PDF-VR-3 would provide additional environmental benefits for the Modified Project and are not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

2. AGRICULTURE / FOREST

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Summary of State-Certified EIR Analysis of Agricultural Resources

Section 4.12, Agricultural Resources, of the State-certified EIR analyzed impacts to agricultural resources resulting from the development of the Entrada and VCC Planning Areas.

Entrada Planning Area

As discussed in the State-certified EIR, the Entrada Planning Area contains no Important Farmland, and impacts to the planning area's 242.6 acres of grazing land would not be significant.¹⁵ The State-certified EIR determined that, based on the then-current zoning for the Entrada Planning Area, new urban development and establishment of a spineflower preserve would conflict with the site's agricultural zoning and cattle grazing uses, which would be a potentially significant impact. The State-certified EIR concluded that approval of the requested zone change would eliminate this impact; however, if the zone change were not approved, this impact would be significant and unavoidable.¹⁶

Since publication of the State-certified EIR, a zone change has been implemented by the County for the Entrada Planning Area, which now includes land zoned R-1—Single-Family Residence, C-3—Unlimited Commercial, and C-R—Commercial Recreation. In addition, the spineflower preserve within the Entrada Planning Area has since been permanently dedicated on-site.

VCC Planning Area

Per the State-certified EIR, the VCC Planning Area contains 14.8 acres of Prime Farmland, 34.8 acres of Unique Farmland, and 4.1 acres of Farmland of Statewide Importance, all of which would be removed, thus resulting in a significant impact. However, as the VCC Planning Area is zoned for industrial uses, any land use conversion to non-agricultural uses would not conflict with an existing agricultural zoning designation, and this impact would not be significant.¹⁷

Mitigation Measures RMDP/SCP-AG-1 and RMDP/SCP-AG-2 from the State-certified EIR apply to the VCC Planning Area. However, even with such mitigation, the State-certified EIR concluded that impacts to Important Farmland would be significant and unavoidable.

¹⁵ See State-certified EIR, 4.12-19.

¹⁶ See State-certified EIR, 4.12-19.

¹⁷ See State-certified EIR, page 4.12-19.

Evaluation of Agricultural Resources Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
Would the project:			
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 checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
The Modified Project would not increase the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use as compared to the 2017 Approved Project.

Entrada Planning Area

The Modified Project would not increase the development footprint as analyzed by the State-certified EIR (with the exception of temporary disturbance to the 0.6-acre previously disturbed golf course area on The Oaks Club at Valencia golf course, which will be fully restored following construction) and would not result in the conversion of any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Accordingly, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. As determined in the State-certified EIR, impacts would be less than significant. No additional analysis in the Supplemental EIR is required.

VCC Planning Area

The Modified Project development within the VCC Planning Area would not change the acreage of converted Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as compared to the 2017 Approved Project. Accordingly, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. While Mitigation Measures RMDP/SCP-AG-1 and RMDP/SCP-AG-2 requiring preparation of a phasing map to document the phased discontinuation of existing agricultural activities and the dedication of a permanent agricultural conservation easement for 138 acres of agricultural land on nearby lands would be implemented (refer to Appendix IS-1 of this Initial Study), impacts would remain significant and unavoidable, as determined in the State-certified EIR. No additional analysis in the Supplemental EIR is 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 checked="" type="checkbox"/>
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No Impact. The Modified Project would not conflict with any agricultural zoning, and no portion of the Project Site is designated as an Agricultural Resource Area or subject to a Williamson Act contract.

Entrada Planning Area

Since publication of the State-certified EIR, a zone change has been implemented by the County for the Entrada Planning Area which reduces agricultural zoning impacts compared to the State-certified EIR. As discussed above, the Entrada Planning Area is currently zoned R-1—Single-Family Residence south of Magic Mountain Parkway, C-3—Unlimited Commercial north of Magic Mountain Parkway, and C-R—Commercial

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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Recreation, south of the Southern California Edison electric transmission lines. Additionally, the spineflower preserve within the Entrada Planning Area has been permanently dedicated on-site. The Modified Project does not propose any changes to the spineflower preserve.

Implementation of both urban development and the spineflower preserve within the Entrada Planning Area would not conflict with existing zoning for agricultural uses, and no areas within the Entrada Planning Area are under a Williamson Act contract. Therefore, like the 2017 Approved Project, the Modified Project would not conflict with existing zoning or a Williamson Act contract, and no impact would occur. As such, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area; in fact, the previously identified potential significant and unavoidable impact would no longer occur since the County already implemented a zone change for the Entrada Planning Area such that the site is no longer zoned for agricultural uses. This impact will not be analyzed further in the Supplemental EIR.

VCC Planning Area

The State-certified EIR concluded that the development of the VCC Planning Area under the 2017 Approved Project would not result in significant impacts for this topic area. The Modified Project would not increase impacts as compared to the State-certified EIR for this topic. As the VCC Planning Area is zoned for industrial uses, the proposed development of non-agricultural uses would not conflict with an existing agricultural zoning designation. Therefore, this impact would be less than significant. Additionally, the VCC Planning Area is not under a Williamson Act contract. Therefore, the Modified Project would not conflict with existing agricultural zoning or a Williamson Act contract. The Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area; no significant impacts would occur, as determined in the State-certified EIR. This issue will not be analyzed further in the Supplemental EIR.

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. Like the 2017 Approved Project, the Modified Project would not conflict with existing zoning for or cause the rezoning of forest land, timberland, or timberland zoned Timberland Production.

Entrada Planning Area

The Entrada Planning Area is zoned R-1, C-3, and C-R; no portion of the site is zoned for forest land, timberland, or timberland zoned Timberland Production. As a result, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. Consistent with the analysis in the State-certified EIR, there would be no impact to such lands as a result of the Modified Project, and no mitigation is required. This issue will not be analyzed further in the Supplemental EIR.

VCC Planning Area

As previously discussed, the VCC Planning Area is zoned M-1.5-DP; no portion of the site is zoned for

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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forest land, timberland, or timberland zoned Timberland Production. As a result, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. Consistent with the analysis in the State-certified EIR, there would be no impact to such lands as a result of the Modified Project, and no mitigation is required. This issue will not be analyzed further in the Supplemental EIR.

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

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
Like the 2017 Approved Project, the Modified Project would not result in impacts to forest land or conversion of forest land to a non-forest use.

Entrada Planning Area

No portion of the Entrada Planning Area is located within designated forest land such as a National Forest, and no portion of the site is used for timber production or other forest uses. As a result, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. Consistent with the analysis in the State-certified EIR, there would be no significant impact from the loss of forest land or the conversion of forest land to non-forest uses, and no mitigation is required. This issue will not be analyzed further in the Supplemental EIR.

VCC Planning Area

No portion of the VCC Planning Area is located within designated forest land such as a National Forest, and no portion of the site is used for timber production or other forest uses. As a result, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. As such, consistent with the analysis in the State-certified EIR, there would be no significant impact from the loss of forest land or the conversion of forest land to non-forest uses, and no mitigation is required. This issue will not be analyzed further in the Supplemental EIR.

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?

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
The Modified Project would not increase any changes in the existing environment that could result in the conversion of designated Farmland to a non-agricultural use or the conversion of forest land to a non-forest use as compared to the 2017 Approved Project.

Entrada Planning Area

The general nature and location of Modified Project development have not changed compared to the 2017 Approved Project. Thus, consistent with the analysis within the State-certified EIR, the Entrada development would not involve changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland to non-agricultural use or the conversion of forest land to

<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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non-forest use. As no impact would result, the Modified Project would not cause any new significant impacts or increase the severity of previously identified impacts related to this topic. No mitigation is required, and no additional analysis in the Supplemental EIR is necessary.

VCC Planning Area

The general nature and location of Modified Project development have not changed compared to the 2017 Approved Project. Thus, consistent with the analysis within the State-certified EIR, the VCC development would not involve changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest use. As no impact would result, the Modified Project would not cause any new significant impacts or increase the severity of previously identified impacts related to this topic. No mitigation is required, and no additional analysis in the Supplemental EIR is necessary.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Summary of State-Certified EIR Analysis of Air Quality

Section 4.7, Air Quality, of the State-certified EIR analyzed impacts to air quality resulting from the development of the Entrada and VCC Planning Areas.

Entrada and VCC Planning Areas

Construction in the Entrada and VCC Planning Areas would generate emissions of volatile organic compounds (VOC), nitrogen oxides (NO_x), respirable particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}) that exceed the South Coast Air Quality Management District's (SCAQMD) thresholds of significance, and construction-related air quality impacts would be significant. Mitigation Measures RMDP/SCP-AQ-1 through RMDP/SCP-AQ-12 and measure VCC-AQ-1 for VCC construction would reduce construction-related emissions to some extent; however, such impacts would remain significant and unavoidable within each planning area.¹⁸ Cumulative impacts also would be significant and unavoidable.

Operation of the Entrada and VCC uses would generate operational emissions of VOC, NO_x, carbon monoxide (CO), PM₁₀, and PM_{2.5} that exceed the thresholds of significance, and operational air quality impacts would be significant. Mitigation Measures RMDP/SCP-AQ-13 through RMDP/SCP-AQ-16 and measure VCC-AQ-2 for VCC operations would reduce emissions, but operational air quality impacts would remain significant and unavoidable. Impacts related to the exposure of sensitive receptors to substantial pollutant concentrations and cumulative impacts likewise would be significant and unavoidable.¹⁹

As also evaluated in the State-certified EIR, development of the Entrada and VCC Planning Areas would not conflict with or obstruct implementation of the SCAQMD's Air Quality Management Plan (AQMP). In addition, no odor-generating activities would result from construction or operation of the proposed uses, nor from the creation of the spineflower preserve within Entrada. Therefore, such impacts would be less than significant.²⁰

Evaluation of Air Quality Impacts for the Modified Project

As discussed above in the Project Description, buildout of the VCC Planning Area would be consistent with the uses allowed by the County-approved entitlements for VCC and the existing zoning. As also discussed above in the Project Description, the Modified Project would include changes to the land use plan for the Entrada Planning Area. To evaluate air quality impacts, the Supplemental EIR will analyze the changes and refinements associated with the Modified Project, as described in the Project Description above. Additionally, the State-certified EIR utilized an earlier air quality model to estimate emissions—the Urban Emissions (URBEMIS) model. Currently, the SCAQMD and Los Angeles County recommend using the updated California Emissions Estimator Model[®] (CalEEMod) to estimate emissions. Accordingly, the Supplemental EIR will disclose any changes in emissions associated with the Modified Project.

¹⁸ See State-certified EIR, page 4.7-125 and 4.7-128.

¹⁹ See State-certified EIR, page 4.7-126 and 4.7-128.

²⁰ See State-certified EIR, page 4.7-67.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The potential air quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The potential air quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The potential air quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. Like the 2017 Approved Project, the Modified Project would not cause adverse odors affecting a substantial number of people.

Entrada Planning Area

Odor impacts associated with development of the Modified Project within the Entrada Planning Area would be consistent with the analysis included in the State-certified EIR. Specifically, since the same types of land uses and general intensity of development would occur, the Modified Project would not include new sources of odors compared to the 2017 Approved Project and, thus, would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. not cause any new or more severe significant impacts related to this topic. The State-certified EIR determined impacts would be less than significant, and no mitigation would be necessary. No additional analysis in the Supplemental EIR is required.

VCC Planning Area

Odor impacts associated with development of the Modified Project in the VCC Planning Area would be consistent with the analysis included in the State-certified EIR. Specifically, since the same types of land uses and general intensity of development would occur, the Modified Project would not include new sources of odors compared to the 2017 Approved Project and, thus, would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. The State-certified EIR

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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determined impacts would be less than significant, and no mitigation would be necessary. No additional analysis in the Supplemental EIR is required.

4. BIOLOGICAL RESOURCES

Summary of State-Certified EIR Analysis of Biological Resources

Entrada and VCC Planning Areas

Section 4.5, Biological Resources, of the State-certified EIR analyzed impacts to biological resources resulting from the development of the Entrada and VCC Planning Areas. More specifically, the State-certified EIR evaluated impacts to: (1) vegetation communities and land covers; (2) wildlife movement, including live-in habitat linkages, travel corridors, and wildlife crossings; (3) common plant and wildlife species; and (4) special-status plant and wildlife species. All biological resource impacts were determined to be less than significant or less than significant with mitigation (generally, Mitigation Measures RMDP/SCP-BIO-1 through RMDP/SCP-BIO-89, although not all apply to the Entrada and VCC Planning Areas), with the exception of impacts to three special-status species: southwestern pond turtle, San Emigdio blue butterfly, and San Fernando Valley spineflower, which would be significant and unavoidable. However, as the San Emigdio blue butterfly has not been observed within the Entrada or VCC Planning Areas nor does its habitat occur therein, that impact is not relevant to the Modified Project.²¹

Section 4.6, Jurisdictional Waters and Streams, of the State-certified EIR analyzed both temporary and permanent impacts to protected wetlands, streambeds, and other jurisdictional waters and their functions and services. All impacts were determined to be less than significant or less than significant with mitigation (generally, Mitigation Measures RMDP/SCP-SW-1 through RMDP/SCP-SW-7, although not all apply to the Entrada and VCC Planning Areas). VCC development also would be subject to Mitigation Measures VCC-SW-1 through VCC-SW-4.²²

In addition, Section 4.14, Land Use, of the State-certified EIR evaluated impacts relating to consistency with applicable habitat conservation plans and natural community conservation plans. Such impacts were not found to be significant, and no mitigation was required.²³

Evaluation of Biological Resources Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</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"/>

Supplemental Analysis Required. The potential biological impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

²¹ See State-certified EIR, pages 4.5-2031-2049.

²² See State-certified EIR, page 4.6-106-109.

²³ See State-certified EIR, pages 4.14-13 and 4.14-16.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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, regulations or by CDFW or USFWS?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The potential biological impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The potential biological impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The potential biological impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

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.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The potential biological impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

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), Specific Plans (L.A. County Code, Title 22, Ch. 22.46), Community Standards Districts (L.A. County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (L.A. County General Plan, Figure 9.3)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The potential biological impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
The Modified Project would not increase impacts related to this topic as compared to the 2017 Approved Project.

Entrada Planning Area

The State-certified EIR concluded that impacts related to conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan in the Entrada planning area would be less than significant. The Entrada Planning Area is not subject to any habitat conservation plan or natural community conservation plan with the exception of the Spineflower Conservation Plan (SCP), which was evaluated within and adopted in conjunction with the State-certified EIR. As part of the SCP, a 27.2-acre spineflower preserve would be established on-site; this area already has been permanently dedicated (see Figure 3.1, above). The Project Applicant is relying upon the SCP to obtain federal and state permits and agreements from the U.S. Fish and Wildlife Service (USFWS) and CDFW to protect and manage a series of spineflower preserves and authorize take (i.e., removal) of spineflower in areas located outside of the designated preserves. The USFWS issued a Candidate Conservation Agreement that commits the Project Applicant to implement conservation, management, and monitoring measures for spineflower, including within the Entrada South Spineflower Preserve as set forth in the SCP. The Entrada development would rely upon the SCP and associated take authorizations. Thus, the SCP facilitates development of the Entrada Planning Area; as proposed, the Modified Project is consistent with the approved SCP.

In summary, Modified Project development within the Entrada Planning Area would be consistent with the analysis provided in the State-certified EIR with respect to applicable provisions of approved local, regional, or state habitat conservation plans. Thus, it would not cause any new or more severe significant impacts related to this topic. Such impacts were not found to be significant in the State-certified EIR. No additional analysis in the Supplemental EIR is required.

VCC Planning Area

The State-certified EIR concluded that impacts related to conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan in the VCC Planning Area would be less than significant. The Modified Project would not increase impacts related to this topic as compared to the 2017 Approved Project. Like Entrada, the VCC Planning Area is not subject to any habitat conservation plan or natural community conservation plan with the exception of the SCP. While no spineflower preserve would be established within VCC, spineflower does occur within the planning area. Thus, the VCC development would rely upon the SCP and associated take authorizations described above. As proposed, the Modified Project is consistent with the approved SCP. Accordingly, development of the Modified Project within the VCC Planning Area would be consistent with the analysis in the State-certified EIR with respect to applicable provisions of approved local, regional, or state habitat conservation plans. Thus, it would not cause any new or more severe significant impacts related to this topic. Such impacts were not found to be significant in the State-certified EIR. No additional analysis in the Supplemental EIR is required.

5. CULTURAL RESOURCES

Summary of State-Certified EIR Analysis of Cultural Resources

Section 4.10, Cultural Resources, of the State-certified EIR analyzed impacts to cultural resources, including historic and archaeological resources as well as human remains, resulting from the development of the Entrada and VCC Planning Areas.

Entrada Planning Area

As the Entrada Planning Area is generally undeveloped, historic resources are not present. The State-certified EIR found impacts to historic resources to be less than significant, with no mitigation required.²⁴

The State-certified EIR found that no known archaeological resources are located within the Entrada Planning Area.²⁵ However, ground-disturbing activities conducted within the Entrada Planning Area could uncover previously undetected cultural resources, and disturbance of an unrecorded archaeological site would result in a significant impact. The State-certified EIR concluded such impacts could be reduced to a less than significant level with implementation of Mitigation Measure RMDP/SCP-CR-5, which requires that ground-disturbing activities be halted should cultural resources be encountered until a qualified archaeologist and Native American representative complete an evaluation of the eligibility of the resources pursuant to criteria established by the California Register of Historical Places and National Register of Historical Places.²⁶

In addition, the State-certified EIR determined impacts associated with the disturbance of human remains would be less than significant with implementation of Mitigation Measure RMDP/SCP-CR-6, which sets forth procedures consistent with Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5.²⁷

VCC Planning Area

As the remaining portion of the VCC Planning Area is generally undeveloped, historic resources are not present. The State-certified EIR found impacts to historic resources to be less than significant, with no mitigation required.²⁸

The State-certified EIR found that no known archaeological resources are located within the VCC Planning Area.²⁹ However, ground-disturbing activities conducted within the VCC Planning Area could uncover previously undetected cultural resources, and disturbance of an unrecorded archaeological site would result in a significant impact. The State-certified EIR concluded that such impacts could be reduced to a less than significant level within the VCC Planning Area with implementation of Mitigation Measure RMDP/SCP-CR-5, in combination with previously adopted Mitigation Measures VCC-CR-1 and VCC-CR-2.³⁰ The

²⁴ See State-certified EIR, page 4.10-24.

²⁵ See State-certified EIR, page 4.10-24.

²⁶ See State-certified EIR, page 4.10-24.

²⁷ See State-certified EIR, November 2010 Final Addendum, pages 4.10-42-43.

²⁸ See State-certified EIR, page 4.10-24.

²⁹ See State-certified EIR, page 4.10-24.

³⁰ See State-certified EIR, page 4.10-24.

State-certified EIR also included Mitigation Measure RMDP/SCP-CR-6 to reduce impacts to undiscovered human remains within the VCC Planning Area to a less than significant level.³¹

Summary of State-Certified EIR Analysis of Paleontological Resources

Entrada and VCC Planning Areas

Section 4.11, Paleontological Resources, of the State-certified EIR concluded that future development in the Entrada and VCC Planning Areas would have a low to medium potential to result in impacts to paleontological resources and unique geologic features. Such impacts would be reduced to a less than significant level with implementation of Mitigation Measures RMDP/SCP-PR-1 through RMDP/SCP-PR-4, which specify monitoring requirements, planned contingencies in the unlikely event that paleontological resources are discovered, and periodic sampling/screening requirements to be carried out by a qualified paleontologist; and Mitigation Measures RMDP/SCP-PR-5 through RMDP/SCP-PR-7, which require curation and reporting of any paleontological resources found during the course of the Project.³² The County of Los Angeles also adopted Mitigation Measures VCC-PR-1 and VCC-PR-2 to minimize paleontological impacts within the VCC Planning Area.

Evaluation of Cultural Resources Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</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 checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts to historical resources as compared to the 2017 Approved Project. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally, a resource is considered “historically significant” if it meets one of the following criteria:

- Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possess high artistic values;
- Has yielded, or may be likely to yield, information important in prehistory or history.

As discussed above, the Entrada and VCC Planning Areas are generally undeveloped, and historic resources are not present. Since Modified Project development would fall within the same disturbance footprints analyzed in the State-certified EIR, impacts would be unchanged from the previously identified less than

³¹ See State-certified EIR, Final Addendum, pages 4.10-42-43.

³² See State-certified EIR, page 4.11-12.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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significant impacts. Accordingly, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. No additional analysis in the Supplemental EIR is required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?

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Supplemental Analysis Required. The Modified Project's potential impacts to archaeological resources will be evaluated further in the Supplemental EIR.

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

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Development proposed within the Entrada and VCC Planning Areas falls within the disturbance footprints analyzed in the State-certified EIR and would be consistent with the general scope and intensity of development that was studied therein. Moreover, the Modified Project would implement Mitigation Measures RMDP/SCP-PR-1 through RMDP/SCP-PR-7, as well as Mitigation Measures VCC-PR-1 and VCC-PR-2, to minimize paleontological impacts within the Entrada and VCC Planning Areas. The State-certified EIR found that implementation of these mitigation measures would reduce potential impacts to a less-than-significant level. Accordingly, as the Modified Project falls within the disturbance footprints analyzed in the State-certified EIR and would be consistent with the general scope and intensity of development that was studied therein, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. The mitigation measures are included in Appendix IS-1 of this Initial Study and will be incorporated into the MMRP for the Modified Project. No additional analysis in the Supplemental EIR is required.

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

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase potential impacts associated with disturbing human remains as compared to the 2017 Approved Project. The State-certified EIR concluded that implementation of Mitigation Measure RMDP/SCP CR-5 would reduce significant impacts associated with disturbing human remains to a less-than-significant level. None of the past cultural resource surveys of these sites have located any human remains, whether interred inside or outside formal cemeteries. The Modified Project's development within the Entrada and VCC Planning Areas would fall within the same disturbance footprints analyzed in the State-certified EIR, and thus impacts would remain unchanged. In addition to complying with Mitigation Measures RMDP/SCP-CR-5 and RMDP/SCP-CR-6 in the unanticipated event human remains are discovered on-site, the Project Applicant would be responsible for compliance with California Health and Safety Code Section 7050.5. California Health and Safety Code Section 7050.5 requires that, in the event that human remains are discovered within the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines the remains are not subject to his or her authority, and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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24 hours, the Native American Heritage Commission. Development of the Entrada and VCC Planning Areas would comply with existing law and would follow mitigation outlined in the State-certified EIR. Therefore, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts. No additional analysis in the Supplemental EIR is required.

6. ENERGY

Summary of State-Certified EIR Analysis of Energy Resources

Entrada and VCC Planning Areas

Section 2, Global Climate Change/Greenhouse Gas Emissions, of the Additional Environmental Analysis prepared for the State-certified EIR studied impacts to global climate change and, by necessity (due to the relationship between energy consumption and the release of GHG emissions), considered the energy implications of development within the Entrada and VCC Planning Areas. As discussed in Section 8, Greenhouse Gas Emissions, below, the State-certified EIR included numerous mitigation measures to increase the energy efficiency of Project development. Of relevance to this discussion are Mitigation Measures RMDP/SCP-2-1 and RMDP/SCP-2-2 (requiring Zero Net Energy design for residential and non-residential development areas), RMDP/SCP-2-3 (requiring solar water heating or equivalent technology for swimming pools at private recreation centers), RMDP/SCP-2-4 and RMDP/SCP-2-5 (requiring extensive charging infrastructure for zero emission vehicles throughout on-site residential and non-residential development areas), RMDP/SCP-2-6 through RMDP/SCP-2-9 (requiring transportation-related commitments, such as implementation of a Transportation Demand Management Plan, traffic signal synchronization, and funding to convert bus fleets to zero emissions technology), RMDP/SCP-2-11 (requiring implementation of an off-site building retrofit program), and RMDP/SCP-2-12 (requiring charging infrastructure for zero emission vehicles at off-site locations). As the net zero mitigation framework is designed to minimize energy usage; by increasing energy efficiency, relying on renewable power, and substantially expanding the use of zero emissions vehicles, the 2017 Approved Project would not result in wasteful, inefficiency or unnecessary consumption of energy resources, and any potentially significant energy impacts would be reduced to a less than significant level.

Evaluation of Energy Resources Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</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 checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The State-certified EIR studied impacts to global climate change and, due to the relationship between energy consumption and the release of greenhouse gas (GHG) emissions, considered the energy implications of development within the Entrada and VCC Planning Areas. As summarized below in Section 8, Greenhouse Gas Emissions, the State-certified EIR included a comprehensive suite of GHG mitigation measures designed to increase renewable energy usage and improve energy efficiency while expanding the use of zero-emissions vehicles and thereby reduce fossil fuel usage from electricity generation and personal vehicles. As discussed below, the mitigation framework would avoid the wasteful, inefficient or unnecessary consumption of energy resources by reducing energy consumption in the built environment by exceeding code-based standards; relying on renewable energy sources; and incentivizing the use of zero emission vehicles. In fact, the California Air Resources Board's 2017 Climate Change Scoping Plan Update highlighted the 2017 Approved Project as a model "example [...] of sustainable land use development projects in California" based on the mitigation framework in the State-certified EIR to reduce fossil fuel

energy usage and achieve net zero GHG emissions.

In the memorandum entitled Entrada South and Valencia Commerce Center Project—Greenhouse Gas and Energy Impacts (GHG and Energy Memo), included as Appendix IS-2 of this Initial Study, Ramboll US Corporation analyzed whether the Modified Project could result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. As part of this analysis, Ramboll considered Appendix F of the CEQA Guidelines, which identifies six categories of potential energy-related environmental impacts:

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate the energy intensiveness of materials may be discussed.
2. The effects of the project on local and regional energy supplies and on requirements for additional capacity.
3. The effects of the project on peak and base period demands for electricity and other forms of energy.
4. The degree to which the project complies with existing energy standards.
5. The effects of the project on energy resources.
6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Construction—Construction activities consume energy in the form of diesel and gasoline fuel for on-road vehicles and off-road construction equipment, and electricity for construction equipment and water supply; all of these activities generate GHG emissions. Accordingly, fuel use and GHG emissions can be calculated from construction equipment assumptions using standard modeling software (e.g., CalEEMod®). The State-certified EIR disclosed the unmitigated total amounts of on-road and off-road construction equipment and vehicle use for Entrada South and Valencia Commerce Center. As described in more detail in the GHG discussion below, construction emissions for the Modified Project would not increase compared to construction emissions reported in the State-certified EIR because the Modified Project would involve the same types and number of pieces of construction equipment as assumed in the State-certified EIR analysis of the 2017 Approved Project. Likewise, as discussed below, the Modified Project would not increase construction-related energy use as compared to that disclosed in the State-certified EIR.

Project construction would require use of on-road trucks for hauling and vendor deliveries, and off-road equipment such as excavators, cranes, forklifts, and pavers. The Modified Project would comply with State and local requirements designed to minimize idling and associated emissions, which also minimize use of fuel. Specifically, idling of commercial vehicles and off-road equipment would be limited to five minutes in accordance with the Commercial Motor Vehicle Idling Regulation and the Off-Road Regulation, and the trucks used would comply with the requirements of the Tractor-Trailer Greenhouse Gas Regulation. Furthermore, Mitigation Measure AQ-2 in the State-certified EIR prohibits truck idling in excess of five minutes.

For Entrada South, the Modified Project's footprint for horizontal construction (e.g., site preparation, grading, demolition, and utilities installation) would remain unchanged. Therefore, the construction-related energy use associated with those sub-phases of construction is not anticipated to increase under the Modified

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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Project as compared to the 2017 Approved Project. Furthermore, while the Modified Project would result in a change in land use sub-types compared to what was assumed in the State-certified EIR, the overall square footage of development would be approximately the same under the Modified Project. Additionally, the analysis of vertical construction in the State-certified EIR conservatively assumed that the maximum level of off-road equipment would be used in all construction years for each construction phase (whereas in reality, the peak equipment level would be utilized in a single year with other years involving less equipment), as described further below. As a result, the construction-related energy use during vertical construction also is not expected to increase under the Modified Project as compared to the 2017 Approved Project.

For VCC, the Modified Project will not change the Project footprint, proposed land uses, nor the total building square footage compared to what was assumed in the State-certified EIR. Therefore, the construction-related energy use from all aspects of VCC are not anticipated to change.

As discussed in **Section 8**, Greenhouse Gas Emissions, below, the State-certified EIR also included conservative assumptions about the mix of construction equipment that would be used during construction. Actual average construction equipment use is expected to be lower than the peak construction equipment use considered in the State-certified EIR.

Overall, construction-related energy use for the Modified Project is not expected to increase compared to the 2017 Approved Project. Energy use and fuel efficiency for construction typically improves over time as older equipment is replaced and repowered; therefore, fuel and energy efficiency for the Modified Project is expected to be the same or even potentially improved from the efficiencies assumed in the State-certified EIR. Additionally, there are no unusual Modified Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities, or equipment that would not conform to current emissions standards (and related fuel efficiencies).

Operations—Modified Project operations would require energy in the forms of electricity, natural gas, gasoline, and diesel. The GHG emissions analysis in the State-certified EIR disclosed the unmitigated total amounts of electricity and natural gas use and mobile vehicle use for Entrada South and Valencia Commerce Center. The estimated changes in operational energy consumption associated with Modified Project development within Entrada South are increases of 2,572 megawatt-hours per year (MWh/yr) of electricity, 480 million British thermal units per year (MMBTU/yr) of natural gas, 117 thousand gallons per year (TGAL/yr) of diesel fuel, 571 TGAL/year of gasoline, and 178 MWh/yr for mobile fuel, while VCC would not have any changes in energy use as compared to the 2017 Approved Project (see the GHG and Energy Memo for additional discussion). This level of energy consumption represents an extremely small portion of the total energy use in Los Angeles County and California (see Tables 8 and 9 in the GHG and Energy Memo); accordingly, the Modified Project would not materially impact local or regional energy supplies or require additional capacity to be constructed, nor would the Modified Project have a material effect on local or regional energy resources.

Moreover, the comprehensive suite of GHG mitigation measures described in **Section 8**, Greenhouse Gas Emissions, which are designed to reduce operational energy usage (i.e., reduce non-renewable electricity use and reduce fossil fuel vehicle use), will continue to apply to the Modified Project. The State-certified EIR included an extensive GHG mitigation framework that incorporates renewable energy and energy efficiency measures into building design, equipment use, transportation and other project features. The Modified Project will continue to implement all applicable mitigation measures. Specifically, Mitigation Measures 2-1 and 2-2 designed to achieve Zero Net Energy for all residential and non-residential buildings exceed the

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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current (2019) Title 24, Part 6, Building Energy Efficiency Standards requirements and will continue to apply to the modified land use mix. While the applicable Title 24 standards at the time the State-certified EIR was certified were from 2016, the Modified Project would comply with and continue to exceed more current energy standards. The Zero Net Energy requirements will result in the production of renewable electricity from solar panels, which would assist the State in decreasing reliance on fossil fuels and increasing reliance on renewable energy resources. In addition, since the certification of State-certified EIR in 2017, statewide regulatory requirements for renewable electricity production have increased due to the passage of SB 100. Any electricity the Modified Project receives from the electricity grid will contain a higher proportion of renewables than previously analyzed.

In addition, the Modified Project includes numerous incentives to facilitate electric vehicle use and reduce vehicle miles traveled, including installing Level 2 electric vehicle (EV) chargers for every residential unit and numerous Level 2 EV chargers throughout the community, providing incentives for residents to use zero-emissions vehicles, implementing a Transportation Demand Management program to reduce vehicle miles traveled, and a number of other measures. The Modified Project would implement efficient transportation alternatives to reduce its transportation energy use requirements through compliance with Mitigation Measures 2-4 through 2-9 and 2-11, as described below.

In addition, the Modified Project will be constructed in compliance with California's Building Energy Efficiency Standards and Green Building Standards. The Modified Project will adhere to State, regional, and local standards designed to ensure that buildings employ strict energy efficiency techniques and deploy transportation improvement initiatives such as improved vehicle efficiency and zero emission technologies, as described previously.

Overall, the limited energy usage associated with the Modified Project and the applicability of mandatory mitigation requirements from the State-certified EIR would ensure that the Modified Project does not result in the wasteful consumption of energy; accordingly, impacts under this threshold would be less than significant. This issue will not be further evaluated in the Supplemental EIR.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not conflict with or obstruct a state or local plan for renewable energy resources. As stated above in Response to Question 6.a, through implementation of the adopted net zero mitigation framework, the Modified Project would avoid the wasteful, inefficient, or unnecessary consumption of energy resources by reducing energy consumption in the built environment via exceedance of code-based standards; relying on renewable energy sources; and steering conversion of the vehicle fleet away from traditional petroleum-based fuels. These programs would ensure the Modified Project would advance regulatory plans and adopted targets related to renewable energy and energy efficiency. As noted above, the California Air Resources Board's Scoping Plan highlighted the 2017 Approved Project as a recent example of a sustainable community based on its mitigation framework, which the Modified Project would implement. For these reasons, the Modified Project would not conflict with or obstruct a state or local plan for renewable energy resources, during either construction or operation. Refer to the GHG and Energy Memo in Appendix IS-2 of this Initial Study for further discussion.

Like the 2017 Approved Project, the Modified Project would not only be consistent with applicable plans but would surpass existing regulatory standards. The Modified Project would utilize renewable resources

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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(e.g., solar panels) and energy efficient buildings designed to Zero Net Energy standards, which would meet or exceed state and local plans for renewable energy resources. The Modified Project would continue to implement the mitigation measures imposed by the State-certified EIR, as described in the GHG and Energy Memo. As such, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area, and impacts under this threshold would be less than significant. This issue will not be further evaluated in the Supplemental EIR.

7. GEOLOGY AND SOILS

Summary of State-Certified EIR Analysis of Geology and Soils

Section 4.13, Geology and Soils, of the State-certified EIR analyzed impacts related to geology and soils resulting from development of the Entrada and VCC Planning Areas. Impacts associated with the Entrada and VCC Planning Areas were evaluated relative to debris flow hazards, ground rupture, seismic shaking, slope stability (including landslides), bedding planes, shear strength, erosion potential, and liquefaction potential.

Entrada Planning Area

The State-certified EIR found impacts related to the following issues to be less than significant with mitigation: expansive and poorly consolidated soils; ground rupture or displacement, ground failure (liquefaction, landslides, etc.), and ground shaking associated with the potentially active Holser Fault; liquefaction and earthquake induced settlement; and soil erosion or loss of topsoil.³³

VCC Planning Area

Similar to Entrada, impacts related to expansive and poorly consolidated soils as well as ground rupture, ground failure, and ground shaking associated with the Holser Fault were determined to be less than significant with mitigation, as were impacts related to and soil erosion or loss of topsoil.³⁴ The Project geologist recommended that habitable structures not be constructed over the Holser Fault. However, as the types of soils at the VCC site are not conducive to liquefaction, liquefaction impacts were concluded to be less than significant. Previously adopted mitigation measures include VCC-GEO-1 through VCC-GEO-5.

Modified Project Mitigation Measures (Entrada and VCC Planning Areas)

The State-certified EIR concluded that the implementation of the previously adopted VCC mitigation measures and additional measures (e.g., measures similar to those previously adopted for the Newhall Ranch Specific Plan) would ensure that geology and geologic hazard impacts would be less than significant for Entrada South and VCC.³⁵ An analysis of the Modified Project's impacts related to geology and soils was prepared by ENGEO Incorporated and is included in a memorandum entitled Entrada South and Valencia Commerce Center—2021 Project Geology and Geologic Hazards Update (Geotech Memo), provided in Appendix IS-3 of this Initial Study. As described in the Geotech Memo, the following mitigation measures would achieve an equivalent level of mitigation as contemplated by the State-certified EIR, and all such measures shall apply to the Entrada and VCC Planning Areas. Refer to Appendix IS-1 of this Initial Study for ES/VCC-GEO-1 through ES/VCC-GEO-4 and other applicable mitigation measures that will be incorporated into the MMRP for the Modified Project.

- ES/VCC-GEO-1: Prior to issuance of building permits, to address potential risks related to seismic shaking, all structures shall be designed using sound engineering judgment and the latest California Building Code requirements, as a minimum, which prescribe minimum lateral forces, applied statically to each habitable structure, combined with the gravity forces of dead and live loads, as determined in a report by a registered geotechnical engineer and submitted to the

³³ See State-certified EIR, pages 4.13-41-42.

³⁴ See State-certified EIR, pages 4.13-40-41.

³⁵ See State-certified EIR, page 4.13-67.

Department of Public Works pursuant to the County of Los Angeles Manual for Preparation of Geotechnical Reports.

- ES/VCC-GEO-2: Prior to issuance of rough grading permits, and in those portions of the Entrada South and VCC planning areas beneath habitable structural improvements where the anticipated seismic differential settlement exceeds the County of Los Angeles' one-inch seismic differential settlement standard, one or more of the following design requirements will be implemented:
 - a. Alluvium removal to reduce liquefaction-induced settlement to less than 1 inch.
 - b. Ground improvements such as rammed aggregate piers (RAPs), deep soil mixing (DSM), or stone columns to reduce liquefaction-induced settlement to less than 1 inch.
 - c. Ground improvements such as deep dynamic compaction (DDC) or compaction grouting to reduce liquefaction-induced settlement to less than 1 inch.
 - d. Sufficiently stiff foundations or deep foundations.
 - e. An approved alternative design requirement capable of reducing liquefaction induced settlement to less than 1 inch.

The above design requirements shall be performed by removing and/or improving enough liquefiable alluvium to achieve a less than 1-inch seismic differential settlement, pursuant to the County of Los Angeles Manual for Preparation of Geotechnical Reports, or by specific foundation design. Geotechnical recommendations and design requirements shall be presented and approved as a conceptual design at the 100-scale grading plan stage and as a detailed design at the 40-scale grading plan stage.

- ES/VCC-GEO-3: Prior to issuance of rough grading permit, in order to address landslides, unstable soil, liquefaction, expansive soil and dry-sand settlement, a Corrective Grading Plan delineating the areas where such geotechnical conditions exist shall be prepared by a registered geotechnical engineer and submitted to the Department of Public Works pursuant to the County of Los Angeles Manual for Preparation of Geotechnical Reports. The Corrective Grading Plan shall address the following:
 - a. Project grading shall include a combination of ground modification and/or structural mitigation in areas subject to liquefaction to reduce the risk to an acceptable level (as defined by CGS in Special Publication 117a, Chapter 2, or as superseded by CGS guidance in effect at the time of implementation of this measure). Ground modification shall consist of the removal of some of the soil material subject to liquefaction. The recommended depth of removal for mitigation of liquefaction ranges from 5 to 30 feet. Structures shall be designed to resist the anticipated static and seismic total and differential settlements.
 - b. Landslides shall be stabilized and/or removed, and/or building setbacks shall be used to protect structural integrity.
 - c. Grading and engineering design requirements shall address the removal of unstable soil, stabilization of potential landslide areas, and compaction of engineered fill to meet County of Los Angeles soil compaction requirements (County of Los Angeles Grading Guidelines, 2017).

- d. Areas where expansive soil is encountered shall include grading measures designed to reduce hazard of construction in expansive soil including but not limited to removing expansive soil and replacing with engineered fill, installing drainage systems, using stiffened foundations systems, or conducting engineered preparation of building pads.
- ES/VCC-GEO-4: Prior to the issue of building permits, and after the site has been mass graded, soil corrosion testing shall be completed and appropriate design requirements shall be implemented in accordance with the latest California Building Code (CBC) as a minimum, to reduce the hazard of construction in corrosive soil.

Evaluation of Geology and Soils Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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 checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
An analysis of the Modified Project's impacts related to geology and soils was prepared by ENGEO Incorporated and is included in the Geotech Memo provided in Appendix IS-3 of this Initial Study. Aside from addressing impacts and mitigation associated with the Modified Project, the Geotech Memo includes an extensive summary of current regulatory requirements related to geotechnical issues.

Entrada Planning Area

The Modified Project would not increase impacts related to fault rupture as compared to the 2017 Approved Project. As indicated in the Geotech Memo, no active or potentially active faults are known to exist within the Entrada Planning Area. Additionally, no portion of the Entrada Planning Area is located within an Alquist-Priolo Earthquake Fault Zone. The State-certified EIR concluded fault rupture impacts would be less than significant with mitigation. The analysis in the Geotech Memo confirms that such hazards would be less than significant due to the absence of any active or potentially active faults within the Entrada Planning Area. Further, Mitigation Measure ES/VCC-GEO-1 addresses potential risks related to seismic shaking. Accordingly, the Modified Project would not cause any new or more severe significant impacts related to this topic. No additional analysis in the Supplemental EIR is required.

VCC Planning Area

The potentially active Holser Fault is mapped within the VCC Planning Area although it is not located within an Alquist-Priolo Earthquake Fault Zone. The State-certified EIR conservatively concluded that fault rupture impacts would be less than significant with mitigation. Although the State-certified EIR referenced Mitigation Measure VCC-GEO-1 from the County-certified VCC EIR, which included building setbacks

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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from the Holser Fault based on known information about the fault at that time, the State-certified EIR also recognized that updated geologic review would be completed by Los Angeles County.³⁶ Subsequent geologic hazard investigations were completed and reviewed by Los Angeles County that were more recent than the data relied upon in the County-certified VCC EIR.³⁷ As discussed in the Geotech Memo, these subsequent geologic hazard investigations of surface fault rupture hazards along the Holser Fault concluded that the risk of surface rupture on the Holser Fault is low and that fault setbacks are not required throughout VCC.³⁸ Based on review of these subsequent studies and the final report submitted to the Los Angeles County Department of Public Works in July 2007, the Geotech Memo concludes that the impact of surface rupture would be less than significant and setbacks would not be necessary. Further, all buildings within the Modified Project must comply with the latest California Building Code requirements and Los Angeles County Code standards to address seismic shaking, as required by Mitigation Measure ES/VCC-GEO-1. Thus, the Modified Project would not cause any new or more severe significant impacts related to this topic. No additional analysis in the Supplemental EIR is required.

ii) Strong seismic ground shaking?

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to seismic ground shaking as compared to the 2017 Approved Project. The State-certified EIR found seismic ground shaking impacts to be less than significant with mitigation. The Modified Project does not include any modifications that would increase risks related to seismic ground shaking. As required by Mitigation Measure ES/VCC-GEO-1 and described in the Geotech Memo, application of current regulatory compliance requirements associated with the current 2019 California Building Code (CBC) would reduce any such impacts related to seismic ground shaking to a less than significant level.

More specifically, Mitigation Measure ES/VCC-GEO-1 requires all buildings within the Modified Project to be constructed in conformance with the latest CBC requirements to address seismic hazards, subject to review and oversight by the Los Angeles County Public Works Department. The 2019 CBC specifically addresses risks associated with seismic ground shaking. Among other regulatory requirements, the 2019 CBC requires that structures must be designed and certified by a registered engineer to be able to: (1) resist minor earthquakes without damage; (2) resist moderate earthquakes without structural damage but with some nonstructural damage; and (3) resist major earthquakes without collapse, but with some structural, as well as nonstructural damage. As concluded in the Geotech Memo, it is reasonable to expect that well-designed and well-constructed structures, as required by Mitigation Measures ES/VCC-GEO-1 and ES/VCC-GEO-2, will not collapse or cause loss of life in a major earthquake.³⁹ Thus, the Modified Project would not cause any new or more severe significant impacts related to this topic. No additional analysis in the Supplemental EIR is required.

³⁶ See State-certified EIR, page 4.13-67.

³⁷ See Geotech Memo at p. 8-9 [citing Geolabs; Geotechnical Investigation and Surface Fault Rupture Hazard Assessment, Tentative Parcel Map 18108, Castaic, California; May 31, 2007; R.T. Frankian & Associates; Response to Los Angeles County Department of Public Works Geotechnical Review No. 2, Vesting Tentative Tract Map No. 53295; January 16, 2008; Job No. 2004-700-22].

³⁸ See Geotech Memo at p. 8-9.

³⁹ See Geotech Memo at p. 9-10.

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

<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to seismic-related ground failure, including liquefaction and lateral spreading, as compared to the 2017 Approved Project. The State-certified EIR found seismic-related ground failure impacts to be less than significant with mitigation. The Modified Project does not include any modifications from the 2017 Approved Project that would increase risks related to liquefaction and lateral spreading, and the Modified Project requires Mitigation Measures ES/VCC-GEO-2 and ES/VCC-GEO-3 to address risks related to liquefaction and lateral spreading.

According to the Geotech Memo, the Seismic Hazard Zone Report for the Newhall Ranch 7.5-Minute Quadrangle shows portions of both VCC and Entrada South to be potentially susceptible to liquefaction. Further analyses also have concluded that liquefaction mitigation should be incorporated into the proposed VCC and Entrada designs to reduce the impacts of liquefaction and dry-sand settlement to less than significant levels. As portions of the VCC and Entrada Planning Areas may experience seismic differential settlement in excess of one inch, mitigation in the form of alluvium removal will be needed to reduce the hazard to a less than significant level, in compliance with County requirements. Mitigation Measures ES/VCC-GEO-2 and ES/VCC-GEO-3 are proposed to address seismic differential settlement, liquefaction, and related hazards through alluvium removal and implementation of a Corrective Grading Plan. Refer to Appendix IS-1 of this Initial Study for a list of these and other applicable mitigation measures, which will be incorporated into the MMRP for the Modified Project. Because the State-certified EIR concluded seismic-related ground failure impacts to be less than significant with mitigation and the Modified Project will implement such mitigation with ES/VCC-GEO-2 and ES/VCC-GEO-3, the Modified Project would not cause any new or more severe significant impacts related to this topic. No additional analysis in the Supplemental EIR is required.

iv) Landslides?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to landslides as compared to the 2017 Approved Project. The State-certified EIR concluded landslide impacts to be less than significant with mitigation. The Modified Project does not include any modifications from the 2017 Approved Project that would increase risks related to landslides and the Modified Project requires Mitigation Measure ES/VCC-GEO-3 to address landslide risks. As discussed in the Geotech Memo, the Seismic Hazard Zone Reports for the Val Verde and Newhall 7.5-Minute Quadrangles map portions of Entrada South and VCC as potentially susceptible to earthquake-induced landslides. Several potential landslide areas have been mapped, including five in the Entrada Planning Area and one in VCC. These potential landslides will require supplemental subsurface investigations to confirm their existence and to meet regulatory compliance standards. If landslides are confirmed, an assessment of their stability must be made to demonstrate they will not adversely affect the proposed development, and a Corrective Grading Plan delineating these areas shall be submitted to the County Department of Public Works as required for regulatory compliance. Landslides identified on the Corrective Grading Plans would be mitigated through stabilization, removal, and/or building setbacks, as determined by the Geotechnical Engineer. Mitigation Measure ES/VCC-GEO-3 is proposed to address landslide hazards and related issues through implementation of a Corrective Grading Plan. Refer to Appendix IS-1 of this Initial Study for this and other applicable mitigation measures, which will be incorporated into the MMRP for the Modified Project. With implementation of these corrective grading

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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measures, impacts related to potential landslides would be reduced to a less than significant level. Because the State-certified EIR concluded landslide impacts to be less than significant with mitigation and the Modified Project will implement such mitigation with Mitigation Measure ES/VCC-GEO-3 to address landslide risks, the Modified Project would not cause any new or more severe significant impacts related to this topic. No additional analysis in the Supplemental EIR is required.

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

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to soil erosion or loss of topsoil as compared to the 2017 Approved Project. The State-certified EIR concluded that the effects of substantial soil erosion or loss of topsoil may include the undermining of structures and slopes, alterations of surface drainage patterns, steepening of slopes, and loss of setback areas and safety zones would be less than significant with mitigation. The Modified Project does not include any modifications from the 2017 Approved Project that would increase risks related to soil erosion or the loss of topsoil and the Modified Project requires Mitigation Measure ES/VCC-GEO-3 to address soil erosion risks.

As discussed in the Geotech Memo, corrective grading measures required by Mitigation Measure ES/VCC-GEO-3 would be designed to remove unstable soils, stabilize potential landslide areas, and compact engineered fill to meet County grading and soil compaction requirements and reduce impacts to a less than significant level. Specifically, Mitigation Measure ES/VCC-GEO-3 is proposed to address such issues through implementation of a Corrective Grading Plan. Because the State-certified EIR concluded soil erosion and loss of topsoil impacts to be less than significant with mitigation and the Modified Project will implement such mitigation with Mitigation Measure ES/VCC-GEO-3, the Modified Project would not cause any new or more severe significant impacts related to this topic. No additional analysis in the Supplemental EIR is required.

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/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to soil instability that could potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse as compared to the 2017 Approved Project. The State-certified EIR concluded impacts related to unstable soil conditions, including seismic-related ground failure to be less than significant with mitigation. The Modified Project does not include any modifications from the 2017 Approved Project that would increase risks related to unstable soil conditions, including seismic-related ground failure, and the Modified Project requires Mitigation Measure ES/VCC-GEO-3 to address such risks.

As previously discussed, the Seismic Hazard Zone Reports for the Val Verde and Newhall 7.5-Minute Quadrangles map substantial portions of the Entrada and VCC Planning Areas as potentially susceptible to liquefaction and earthquake-induced landslides. As such, a Corrective Grading Plan delineating these areas would be submitted to the County Department of Public Works as required, and areas subject to these hazards would be mitigated during corrective grading. Specifically, Mitigation Measure ES/VCC-GEO-3 is proposed to address unstable soils, landslides, liquefaction, expansive soils, and dry-sand settlement through implementation of a Corrective Grading Plan. Refer to Appendix IS-1 of this Initial Study for this and other

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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applicable mitigation measures, which will be incorporated into the MMRP for the Modified Project. With implementation of these corrective grading measures, impacts related to unstable soil conditions, including seismic-related ground failure, would be reduced to a less than significant level. Because the State-certified EIR concluded impacts related to unstable soil conditions, including seismic-related ground failure, to be less than significant with mitigation and the Modified Project will implement such mitigation with Mitigation Measure ES/VCC-GEO-3, the Modified Project would not cause any new or more severe significant impacts related to this topic. No additional analysis in the Supplemental EIR is required.

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?

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to expansive soils as compared to the 2017 Approved Project. The State-certified EIR concluded impacts related to expansive soil to be less than significant with mitigation. The Modified Project does not include any modifications from the 2017 Approved Project that would increase risks related to expansive soil and the Modified Project requires Mitigation Measures ES/VCC-GEO-3 and ES/VCC-GEO-4 to address risks related to expansive soil.

As discussed in the State-certified EIR and reiterated in the Geotech Memo, reddish-brown clayey siltstone lenses in the Saugus Formation, which are located in both the Entrada and VCC Planning Areas, are potentially expansive, and alluvial soils are poorly to moderately consolidated. Accordingly, in compliance with regulatory requirements, testing on expansive soil and/or rock would be performed, and geotechnical design measures such as the removal of expansive soil and replacement with engineered fill, installation of drainage systems, use of stiffened foundations systems, or preparation of engineered building pads would be implemented to reduce hazards associated with constructing in expansive soils. Areas subject to expansive soils would be mitigated during corrective grading, as set forth in Mitigation Measure ES/VCC-GEO-3, detailed in Appendix IS-1 of this Initial Study. In addition, previous geotechnical characterizations have identified the presence of corrosive soils. As detailed in Mitigation Measure ES/VCC-GEO-4 included in Appendix IS-1, soil corrosion testing would be conducted and appropriate mitigation would be implemented in accordance with the latest CBC requirements in order to reduce any hazard related to construction in corrosive soils. With implementation of these mitigation measures, impacts related to expansive and corrosive soils would be reduced to a less than significant level. Because the State-certified EIR concluded impacts related to expansive soil to be less than significant with mitigation and the Modified Project will implement such mitigation with Mitigation Measures ES/VCC-GEO-3 and ES/VCC-GEO-4, the Modified Project would not cause any new or more severe significant impacts related to this topic. No additional analysis in the Supplemental EIR is required.

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

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No Impact. Consistent with the analysis provided in Section 4.13, Geology and Soils, of the State-certified EIR, Modified Project development within the Entrada and VCC Planning Areas would not involve use of septic tanks or other alternative wastewater disposal systems, and no impact would occur. This issue will not be analyzed further in the Supplemental EIR.

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

<i>Supplemental Analysis Required</i> <input type="checkbox"/>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i> <input checked="" type="checkbox"/>	<i>No Impact</i> <input type="checkbox"/>
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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
The Modified Project would not increase impacts related to hillside conditions and associated regulatory compliance as compared to the 2017 Approved Project.

The County’s Hillside Management Area (HMA) Ordinance (County Code Section 22.56.217) became effective on November 5, 2015. The HMA Ordinance and the accompanying Hillside Design Guidelines are intended to ensure “that hillside development projects use sensitive and creative engineering, architectural, and landscaping site design techniques” to preserve natural features in hillside areas.⁴⁰ Conditional use permits (CUPs) are required for all development located wholly or partly in an HMA other than those specifically listed in the Ordinance. The HMA Ordinance outlines a detailed process for CUP applications and conditions of approval, including open space designations and project design.

Much of the Entrada and VCC Planning Area contain hillside land, defined as mountainous and hilly areas with 25 percent slopes or greater. As prescribed under the Hillside Management Area Ordinance, CUPs for hillside development would be required for each planning area. Specifically, for the VCC Planning Area, all future development must comply with CUP 87-360 and the associated Design Guidelines approved by the County in 1991. In accordance with the Hillside Management Area Ordinance, the geotechnical reports prepared for the Project, including those prepared to support the State-certified EIR, as well as the Geotech Memo included in Appendix IS-2 of this Initial Study, address all relevant issues regarding faults and slope stability. Additionally, the Modified Project would comply with the hillside requirements set forth in the County’s General Plan and Zoning Code. In particular, public safety impacts would be avoided or reduced to the extent possible. As such, impacts related to compliance with Hillside Management Area Ordinance or other hillside design standards would be less than significant. As such, the Modified Project would not cause any new or more severe significant impacts related to this topic. No additional analysis in the Supplemental EIR is required.

⁴⁰ County of Los Angeles, Department of Regional Planning, “Hillside Management Area (HMA) Ordinance,” <http://planning.lacounty.gov/hma>, accessed October 1, 2019.

8. GREENHOUSE GAS EMISSIONS

Summary of State-Certified EIR Analysis of Greenhouse Gas Emissions

Entrada and VCC Planning Areas

Section 2, Global Climate Change/Greenhouse Gas Emissions, of the Additional Environmental Analysis included a comprehensive analysis of the 2017 Approved Project's greenhouse gas (GHG) emissions. The State-certified EIR process culminated with CDFW's adoption of a comprehensive GHG mitigation framework to ensure the 2017 Approved Project would achieve net zero GHG emissions. The mitigation framework includes Mitigation Measures RMDP/SCP-2-1 through RMDP/SCP-2-13, as well as a Project Applicant-Proposed Supplemental Commitment that was incorporated into the MMRP. The mitigation framework includes measures that address major components of the Project's emission profile, including, but not limited to the following:

- Achieving Zero Net Energy standards in residential and commercial development areas, as well as for private recreation centers and public facilities;
- Implementing a TDM Plan to reduce VMT;
- Providing an electric vehicle charging station in every residence and offering zero emission vehicle purchase subsidies;
- Installing electric vehicle charging stations in publicly accessible areas on the Project site, as well as in publicly accessible, off-site locations within the County of Los Angeles;
- Funding a building retrofit program to improve the energy efficiency of existing buildings in disadvantaged communities within the County of Los Angeles; and
- Implementing the Newhall Ranch GHG Reduction Plan to fully mitigate all remaining construction and operational Project-related GHG emissions to carbon neutrality.

The Modified Project would be subject to the same net zero mitigation framework as the 2017 Approved Project, which is detailed in Appendix IS 1 of this Initial Study. This mitigation framework along with the Project Applicant-Proposed Supplemental Commitment will be incorporated into the MMRP for the Modified Project.

The State-certified EIR's analysis of GHG impacts was extensive. The GHG mitigation framework and analytical methodology was reviewed by the California Air Resources Board (ARB), the state authority on climate policy. ARB determined the State-certified EIR "provides an adequate technical basis to determine that the project would not result in any net additional GHG emissions after the mitigation measures are fully implemented." ARB reiterated the same view in a letter to CDFW dated June 7, 2017, indicating the State-certified EIR's GHG analyses provide an adequate "technical basis for CDFW to find, in its lead agency discretion..., that the project as currently proposed will not result in any net additional greenhouse gas emissions after identified mitigation measures are fully implemented." Moreover, as highlighted in ARB's 2017 Climate Change Scoping Plan Update, the 2017 Approved Project evaluated in the State-certified EIR serves as one of "[s]everal recent examples of sustainable land use development projects in California [that] have demonstrated that it is feasible to design projects that achieve zero net additional GHG emissions."

In CDFW's findings to certify the State-certified EIR, CDFW concluded that the 2017 Approved Project would feasibly and reliably achieve net zero GHG emissions (see 2017 Final AEA Tables 2.3-4 and 2.3-5).

CDFW further found that with implementation of the adopted GHG mitigation measures, the 2017 Approved Project would not result in a cumulatively considerable contribution to cumulative GHG emissions. Based on the adopted mitigation measures and the Applicant's supplemental commitment, and with technical support from ARB, CDFW found in its independent judgment as Lead Agency that the 2017 Approved Project's GHG impacts would be less than significant with mitigation under CEQA.⁴¹

In addition, because the 2017 Approved Project would result in no net increase of GHG emissions, it would not conflict with any plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The State, and by extension regional and local climate policy, is rooted in achieving an emissions level below the reference year of 1990, which is based on levels established by scientific evidence to avoid the most adverse impacts of climate change. Therefore, relevant plans, such as ARB's Scoping Plan, the Southern California Association of Government's (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and Los Angeles County's Community Climate Action Plan, all establish non-zero targets (i.e., some level of positive net emissions above existing conditions for land developments to accommodate planned growth) to achieve future GHG emissions targets. By achieving net zero GHG emissions, the feasibility and reliability of which has been demonstrated in the analysis set forth in the State-certified EIR's GHG analysis, the 2017 Approved Project would not conflict with any relevant plan, policy, or regulation adopted for the purpose of reducing GHG emissions. CDFW determined that impacts related to conflicts with relevant plans, policies or regulations would be less than significant.

Further, CDFW determined that a 30-year project life is the appropriate period to use to evaluate the 2017 Approved Project's GHG emissions inventory and the Applicant's commitment to net zero emissions. The 30-year project life represents the current reasonable limit of scientific and evidentiary data for the 2017 Approved Project, given current modeling tools, the changing regulatory structure, the level of uncertainty beyond 2050 with respect to regulatory programs mandating further reductions in GHG emissions, and other available information.

When certifying the State-certified EIR, CDFW identified a number of GHG benefits **associated** with the 2017 Approved Project, as follows:

- The 2017 Approved Project represents an innovative demonstration of a mixed-use development project providing needed housing and commercial development in a manner consistent with California's GHG reduction goals. Once developed, the 2017 Approved Project will be one of the largest, if not the largest, developments ever in California to achieve net zero GHG emissions. Benefits achieved from the 2017 Approved Project are exemplified by, but are not necessarily limited to, the following:⁴²
- With implementation of Mitigation Measures RMDP/SCP-2-1 through RMDP/SCP-2-13, the 2017 Approved Project would reduce all Project-related construction and operational GHG emissions to net zero over the 30-year project life.
- As highlighted in ARB's 2017 Climate Change Scoping Plan Update, the 2017 Approved Project serves as one of "[s]everal recent examples of sustainable land use development projects in California [that] have demonstrated that it is feasible to design projects that achieve zero net additional GHG emissions."

⁴¹ Final Actions and Supplemental Findings of the California Department of Fish and Wildlife for the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan, June 2017, p. 14-15.

⁴² Id., pp. 40-41.

- The 2017 Approved Project involves the design and construction of residential development, commercial development, private recreation centers, and public facilities to achieve Zero Net Energy standards, as defined by the California Energy Commission, which advances California policy goals of increasing the energy efficiency of homes and commercial buildings.
- The 2017 Approved Project involves the installation of an electric vehicle charging station at every residence, as well as thousands more electric vehicle charging stations in commercial areas within the Project Site and off-site throughout Los Angeles County. The 2017 Approved Project will also provide subsidies for the purchase of zero emission vehicles to Project residents. This suite of mitigation commitments is expected to make the 2017 Approved Project a model community for electric vehicle ownership and increase the electric vehicle adoption rate within the Santa Clarita area and Los Angeles County, advancing state, regional, and local goals to reduce emissions through an increased use of electric vehicles.
- The 2017 Approved Project includes implementation of a comprehensive Transportation Demand Management Plan to reduce vehicle miles traveled and enhance the use of alternative transportation modes both on- and off-site, thus advancing state, regional and local policy goals.
- The 2017 Approved Project includes subsidies to transit providers for the replacement of up to 10 diesel or compressed natural gas transit buses with zero emission buses.
- The 2017 Approved Project will undertake or fund a building retrofit program to improve the energy efficiency of homes and other buildings within disadvantaged communities in Los Angeles County.
- The 2017 Approved Project will achieve GHG reductions by implementing direct reduction activities in accordance with the Project's GHG Reduction Plan.

Lastly, there is a shortage of existing housing within California. The legislature specifically found that “[t]he lack of housing... is a critical problem that threatens the economic, environmental, and social quality of life in California.” Gov. Code § 65589.5(a)(1)(A). Because of the immediate need for housing projects, the legislature now even requires consideration of the impacts associated with the denial of housing projects. More specifically, Gov. Code § 65589.5(b) explains that “It is the policy of the state that a local government not reject or make infeasible housing development projects... without a thorough analysis of the economic, social, and environmental effects of the action.”

Due to the net zero GHG requirements for the Modified Project, the Modified Project provides housing that does not result in any net increase in GHG emissions, thereby improving GHG emissions when considering other housing growth that may not meet a net zero GHG requirement.⁴³ California's need for housing has been well documented and will occur regardless of the Project. The Project's commitments to net zero GHG emissions helps to ensure that providing housing for California's population will have a less severe impact on GHG emissions as compared to housing that does not achieve net zero GHG emissions. As stated in *Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 220, “the future residents and occupants of development enabled by Project approval would exist and live somewhere else if

⁴³ See *Association of Irrigated Residents v. Kern County Board of Supervisors* (2017) 17 Cal.App.5th 708 [stating that the environmental analysis can consider displaced growth or displaced trips]. The Modified Project's net-zero GHG program accounts for all the potential GHG emissions associated with the project and conservatively does not take credit for any displaced growth or displaced trips.

this Project is not approved. Whether ‘here or there,’ GHG emissions associated with such population growth will occur.”

Evaluation of Greenhouse Gas Emissions Impacts for the Modified Project

As discussed above in the Project Description, buildout of the VCC Planning Area would be consistent with the uses allowed by the County-approved entitlements for VCC and the existing zoning. As also discussed above in the Project Description, the Modified Project would include changes to the land use plan for the Entrada Planning Area, as discussed further in the analysis below.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
Would the project:			
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

An analysis of the Modified Project’s GHG emissions was prepared by Ramboll US Corporation and is included in the GHG and Energy Memo, provided in Appendix IS-2 of this Initial Study. As detailed therein and discussed below, the Modified Project with mitigation would not increase GHG emissions as compared to the 2017 Approved Project, and the Modified Project would continue to achieve net zero GHG emissions based on the mandatory mitigation framework established by the State-certified EIR. As discussed above, the California Air Resources Board’s 2017 Climate Change Scoping Plan Update highlighted the 2017 Approved Project as a “recent example [...] of sustainable land use development projects in California [that] have demonstrated that it is feasible to design projects that achieve zero net additional GHG emissions.” Based on the mitigation framework, which the Modified Project likewise would implement.

Construction—Construction emissions associated with the Modified Project would be consistent with the emissions reported in the State-certified EIR. For Entrada South, the Project footprint for horizontal construction or earthwork (e.g., site preparation, grading, demolition, and utilities installation) would remain consistent with that analyzed in the State-certified EIR. Therefore, the construction emissions from those sub-phases of construction are not anticipated to increase due to the Modified Project. Furthermore, while the Modified Project will result in a change in land use sub-types compared to what was assumed in the State-certified EIR, the overall square footage of development would be approximately the same under the Modified Project, and the amount of vertical construction evaluated in the State-certified EIR was conservatively represented, as described further below. Thus, the calculated construction emissions for the Modified Project’s vertical construction is not expected to increase.

The State-certified EIR conservatively assumed that construction equipment mixes for all years would be the same as the year with the maximum amount of construction for each sub-phase, even though the non-maximum years would have reduced construction equipment mixes. For example, although the building construction sub-phase would span multiple years with varying amounts of construction activity, the off-road equipment mix for every year was assumed to be the same as the year with the greatest amount of construction activity. Given this conservative assumption, the construction modeling parameters in the non-maximum years assumed more construction activity than was actually expected to occur, and total GHG emissions were overestimated. In addition, the mix of construction equipment is expected to become cleaner over time (i.e., generate fewer emissions on average) as older equipment is replaced or repowered.

<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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For Entrada South, the land use mix associated with the Modified Project modifications involves an increase in commercial square footage (from 450,000 square feet to 730,000 square feet) and a reduction in residential development (from 1,725 units to 1,574 units, or from 3,235,100 square feet to 2,951,913 square feet).⁴⁴ These Project modifications would result in approximately the same overall floor area ratio as that assumed in the State-certified EIR.⁴⁵ Therefore, the type and number of construction equipment and the related construction intensity would fall within the envelope of construction activity that was previously analyzed, and the Project modifications for Entrada South would not increase construction emissions relative to those disclosed in the State-certified EIR.

For VCC, the Modified Project would not change the Project footprint, proposed land uses, nor the total building square footage compared to what was assumed in the State-certified EIR. Therefore, construction emissions from all aspects of VCC are not anticipated to increase.

In summary, construction GHG emissions from the Modified Project will not result in any new or more severe significant impacts. As described above, neither the horizontal or vertical construction activities are expected to increase construction emissions. Total GHG emissions are estimated at 12,403 million tons of carbon dioxide equivalent (MT CO₂e) for Entrada South and 13,386 MT CO₂e for VCC, as calculated in the State-certified EIR.⁴⁶ Importantly, the mitigation framework from the State-certified EIR will apply to the Modified Project, and, therefore, there will not be any net increase in GHG emissions. Specifically, Mitigation Measure 2-10 from the State-certified EIR requires construction-related GHG emissions to be mitigated to zero. This mitigation measure will continue to apply to the Modified Project, and therefore net GHG emissions during construction will remain zero. Accordingly, construction-related GHG impacts will continue to be less than significant.

Operations—The State-certified EIR disclosed unmitigated operational GHG emissions for Entrada South and Valencia Commerce Center and mitigated operational GHG emissions for the overall RMDP/SCP Project. Operational GHG emissions sources analyzed in the State-certified EIR include the following categories:

- Area Sources: Combustion emissions from landscaping equipment.
- Building Energy Use: Indirect emissions from electricity production and direct emissions from natural gas combustion.
- Water Use: Indirect emissions from electricity need to supply, treat, and distribute water and wastewater; and direct emissions from wastewater.

⁴⁴ The square footage totals for the residential units referenced in the parenthetical are calculated based on an average unit size of 1,875 square feet.

⁴⁵ The 2017 Approved Project included an estimated 3,685,100 SF of development area within the Entrada Planning Area (450,000 square feet of commercial development and 3,235,100 square feet of residential development). The Modified Project would include an estimated 3,681,913 square feet of development area within the Entrada Planning Area (730,000 square feet of commercial development and 2,951,913 square feet of residential development). As such, the Modified Project would result in a net reduction of approximately 3,187 square feet of floor area within the Entrada Planning Area when compared to the 2017 Approved Project.

⁴⁶ See State-certified EIR, Draft Additional Environmental Analysis, Appendix 1: Greenhouse Gas Emissions Technical Report, Tables 2-7 through 2-9 for Stages 5 and 6 Construction, Ramboll, 2016.

<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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- Solid Waste: Direct emissions from solid waste disposal.
- Traffic: Starting, running, and idling emissions from vehicle use.

To evaluate greenhouse gas impacts, this analysis estimates emissions for the changes associated with the Modified Project.

Unmitigated operational GHG emissions from the Modified Project are expected to be approximately 2,179 MT CO₂e/yr higher than those disclosed in the State-certified EIR for Entrada South and 49 MT CO₂e/yr lower than those disclosed in the State-certified EIR for VCC. Emissions from some source categories will decrease due to increasingly stringent statewide regulatory requirements, while emissions from other source categories may increase or decrease as a result of the Modified Project's refined land use mix. Moreover, the Modified Project's operational GHG emissions would be fully mitigated to net zero with the mandatory mitigation framework from the State-certified EIR, thus the Modified Project would continue to achieve net zero GHGs. Specifically, with continued implementation of Mitigation Measures 2-1 through 2-13, the Mitigated Modified Project's net GHG emissions after mitigation would be reduced to zero. Mitigation Measures 2-1 through 2-13 were reviewed and approved by the California Air Resources Board, which confirmed that the evidence supported a conclusion that the mitigation measures would reduce GHG emission to net zero.⁴⁷ In addition, as discussed in the GHG and Energy Memo,⁴⁸ the Supplemental EV Charger Commitment would result in reductions below net zero of 1,499 MTCO₂e/year and 4,166 MTCO₂e/year for Entrada South and Valencia Commerce Center, respectively, which reductions are more than the anticipated unmitigated operational GHG emissions associated with the Modified Project.⁴⁹ As a result, the mitigated Modified Project would have no net increase in GHG emissions as compared to the existing environmental setting and would not have a significant impact on global climate change under this threshold.

Thus, construction and operational GHG emissions from the Modified Project will not cause a net increase in GHG after mitigation and will not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Thus, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area, and no additional analysis in the Supplemental EIR is required.

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

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
With continued implementation of Mitigation Measures 2-1 through 2-13, the Modified Project's net GHG emissions after mitigation would be reduced to zero. Mitigation Measures 2-1 through 2-13 were reviewed

⁴⁷ See State-certified EIR, Final Additional Environmental Analysis, Appendix 1; Final Actions and Supplemental Findings of the California Department of Fish and Wildlife for the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan, June 14, 2017, Section II.

⁴⁸ See pages 15-16, Supplemental Commitment, of the GHG and Energy Memo for a full discussion of the Applicant-Proposed supplemental commitment and its application to the Modified Project.

⁴⁹ See State-certified EIR, Final Additional Environmental Analysis, Response to Comment No. 09-27 and Appendix 2: Errata to Mitigation Monitoring and Reporting Plan, June 2017.

<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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and approved by the California Air Resources Board, which confirmed that the evidence supported a conclusion that the mitigation measures would reduce GHG emission to net zero.⁵⁰ As a result, the mitigated Modified Project would have no net increase in GHG emissions as compared to the existing environmental setting and thus would not conflict with any adopted and applicable local or State plans, policies, or regulations to reduce GHG emissions by 2020, 2030, and/or 2050, all of which utilize non-zero targets (and thereby allow for some level of emissions for land use developments to accommodate projected growth) to reduce the State's cumulative contribution to global climate change.⁵¹ In addition, the Supplemental EV Charger Commitment would result in 1,499 MTCO₂e/year and 4,166 MTCO₂e/year of reductions beyond net zero for Entrada South and Valencia Commerce Center, respectively. As such, the Modified Project would be consistent with adopted and applicable local and statewide plans, policies, and regulations designed to reduce GHG emissions. In fact, the 2017 Approved Project was recognized as a model community for advancing climate and sustainability goals the 2017 Climate Change Scoping Plan Update, as noted above. Impacts after mitigation would be less than significant under this threshold for both the Entrada and VCC Planning Areas. Refer to Response to Question 8.a, above, for additional discussion. The Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area, and no additional analysis in the Supplemental EIR is required.

⁵⁰ See State-certified EIR, Final Additional Environmental Analysis, Appendix 1; Final Actions and Supplemental Findings of the California Department of Fish and Wildlife for the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan, June 14, 2017, Section II.

⁵¹ The State-certified EIR concluded that relevant plans for the reduction of greenhouse gases establish non-zero targets (i.e., some level of positive net emissions above existing conditions for land use developments to accommodate planned growth). By achieving net zero emissions, the 2017 Approved Project would not conflict with any relevant plan, policy, or regulation. The Modified Project's changes and refinements would not affect these conclusions.

9. HAZARDS AND HAZARDOUS MATERIALS

Summary of State-Certified EIR Analysis of Hazards and Hazardous Materials

Section 4.17, Hazards, Hazardous Materials, and Public Safety, of the State-certified EIR analyzed impacts related to hazards and hazardous materials resulting from the development of the Entrada and VCC Planning Areas. Portions of both the Entrada and VCC Planning Areas were formerly used for oil production, and a number of former oil well sites exist on-site. Despite past remediation activities, residual soil contamination may exist in some areas. In addition, asbestos-containing materials, lead-based paint, and polychlorinated biphenyls may be present within the existing structures on-site. Other existing facilities on-site include high voltage electric transmission lines and towers owned by Southern California Edison, a high pressure gas transmission pipeline owned by Southern California Gas and other gas lines, and groundwater monitoring wells or other water wells.

Entrada Planning Area

The State-certified EIR concluded the following impacts would be less than significant with implementation of Mitigation Measures RMDP/SCP-PH-1 through RMDP/SCP-PH-14 for development within the Entrada Planning Area: hazards related to the routine use, transport, and disposal of hazardous materials; reasonably foreseeable upset and accident conditions; hazardous emissions or the handling of hazardous materials within 0.25 mile of a school; and wildland fires. All other hazards impacts were determined to be less than significant.⁵²

VCC Planning Area

The State-certified EIR concluded the following impacts would be less than significant with implementation of Mitigation Measures RMDP/SCP-PH-1 through RMDP/SCP-PH-14 for development in the VCC Planning Area: hazards related to the routine use, transport, and disposal of hazardous materials; reasonably foreseeable upset and accident conditions; hazardous emissions or the handling of hazardous materials within 0.25 mile of a school; and wildland fires.⁵⁷ The County of Los Angeles also adopted Mitigation Measures VCC-PH-1 and VCC-PH-2 to minimize hazards-related impacts within the VCC Planning Area as part of its approval of the VCC project. All other hazards impacts were determined to be less than significant.⁵³

Project Design Features of the Modified Project (Entrada and VCC Planning Areas)

The Modified Project includes Project Design Feature PDF-HM-1, set forth in Section 17, Transportation, of this Initial Study, which calls for preparation and implementation of a Construction Traffic Management Plan to ensure safe traffic operations and emergency access during construction.

⁵² See State-certified EIR, pages 4.17-57-61.

⁵³ See State-certified EIR, pages 4.17-57-61.

Evaluation of Hazards and Hazardous Materials Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</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?

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Supplemental Analysis Required. As noted above, despite past remediation activities, residual soil contamination may exist in some areas. Therefore, the potential hazards impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

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?

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Supplemental Analysis Required. As noted above, despite past remediation activities, residual soil contamination may exist in some areas. Therefore, the potential hazards impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

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

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Supplemental Analysis Required. As noted above, despite past remediation activities, residual soil contamination may exist in some areas. Therefore, the potential hazards impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

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?

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The Modified Project would not increase impacts related to this topic as compared to the 2017 Approved Project. California Government Code Section 65962.5 requires the California Environmental Protection Agency to compile and update annually the Hazardous Waste and Substances Sites List, also known as the Cortese List. The California Department of Toxic Substances Control (DTSC) is responsible for much of the information contained in the Cortese List, supplemented by additional hazardous material release information from other state and local government agencies. The list is maintained via DTSC's Brownfields and Environmental Restoration Program called EnviroStor. More specifically, EnviroStor is DTSC's data management system for tracking cleanup, permitting, enforcement, and investigation efforts at hazardous waste facilities and sites with known contamination or sites where there may be reasons to investigate further. The EnviroStor database was reviewed by ENGEO to determine if any listed sites are located within the Project Site, and none were found; neither the Entrada nor the VCC Planning Area is included on the Cortese List. Therefore, the Modified Project would not cause any new or more severe significant impacts related to this topic, as compared to the 2017 Approved Project. This issue will not be further

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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evaluated in the Supplemental EIR.

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?

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No Impact. The Project Site is not located within an airport land use plan or within 2 miles of a public or private airport. A private airstrip was previously located on the Airport Mesa portion of the approved Mission Village community planned immediately west of the Entrada Planning Area; however, use of the airstrip has been discontinued.

In addition, Section 4.9, Noise, of the State-certified EIR concluded that there would be no impact relative to airport noise in the Entrada or VCC Planning Areas as neither are located within an airport land use plan. As the Modified Project would remain within the development footprint analyzed in the State-certified EIR, no development would occur within an airport land use plan. Therefore, the Modified Project would not cause any new or more severe significant impacts related to this topic, and no additional analysis in the Supplemental EIR is required.

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

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The State-certified EIR found that impacts to public safety related to emergency response were not significant for the Entrada and VCC Planning Areas. The Modified Project does not include any modifications to the 2017 Approved Project that would increase interference with an adopted emergency response plan or emergency evacuation plan. The Modified Project includes the same mix of uses as the 2017 Approved Project, with only changes to the residential and non-residential allocations for Entrada South that do not have the potential to impair an adopted emergency response plan or emergency evacuation plan. Like the 2017 Approved Project, Modified Project development in the Entrada and VCC Planning Areas would address fire and emergency access needs through the implementation of Mitigation Measure RMDP/SCP-PH-7,⁵⁴ which requires compliance with Los Angeles County Code, Title 21, Chapter 21.24 regarding secondary evacuation access. Further, the Modified Project's circulation system would be designed and constructed in accordance with all applicable Los Angeles County Fire Department (LACFD) requirements. Therefore, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area; no additional analysis in the Supplemental EIR is required.

Additionally, PDF-HM-1, set forth in Section 17, Transportation, of this Initial Study, provides additional benefits for the Modified Project. PDF-HM-1 would require the submission of a detailed Construction Traffic Management Plan which would include provisions for adequate emergency access to all residences and businesses during construction activities. PDF-HM-1 is beneficial and is not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

⁵⁴ See Appendix IS-1 for all applicable mitigation measures.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The Modified Project's potential impacts regarding fire hazards will be evaluated further in the Wildfire section of the Supplemental EIR.

ii) within an area with inadequate water and pressure to meet fire flow standards?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The Modified Project's potential impacts regarding fire hazards will be evaluated further in the Wildfire section of the Supplemental EIR.

iii) within proximity to land uses that have the potential for dangerous fire hazard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The Modified Project's potential impacts regarding fire hazards will be evaluated further in the Wildfire section of the Supplemental EIR.

h) Does the proposed use constitute a potentially dangerous fire hazard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The Modified Project's potential impacts regarding fire hazards will be evaluated further in the Wildfire section of the Supplemental EIR.

10. HYDROLOGY AND WATER QUALITY

Summary of State-Certified EIR Analysis of Hydrology and Water Quality

Section 4.1, Surface Water Hydrology and Flood Control; **Section 4.2**, Geomorphology and Riparian Resources; **Section 4.3**, Water Resources; and **Section 4.4**, Water Quality, of the State-certified EIR analyzed impacts related to hydrology, water quality, and groundwater resulting from the development of the Entrada and VCC Planning Areas, as summarized below.

Both the Entrada and VCC Planning Areas are located in the Santa Clara River basin. The Entrada Planning Area contains portions of four drainage channels, including Magic Mountain Canyon and three unnamed drainages, all of which flow to the river. Castaic Creek and Hasley Creek, both of which are tributaries to the Santa Clara River, flow through the VCC Planning Area. Neither planning area contains any land that falls within a 100-year floodplain.

Entrada Planning Area

As evaluated in **Section 4.1**, Surface Water Hydrology and Flood Control, of the State-certified EIR, hydrology impacts related to flooding/flood hazards and storm water conveyance within the Entrada Planning Area would be less than significant.⁵⁵ Nonetheless, Mitigation Measures RMDP/SCP-HY-1 through RMDP/SCP-HY-7 (not all of which are applicable to development within Entrada) were adopted to ensure no flood hazards would occur.

Section 4.2, Geomorphology and Riparian Resources, of the State-certified EIR evaluated the hydraulic impacts on sensitive aquatic/riparian resources in the Santa Clara River Corridor and tributaries due to implementation of the 2017 Approved Project. Geomorphic processes include sediment production, transport, and storage through the stream corridor, which have the potential to influence river systems and landforms. Within the Entrada Planning Area, the following impacts were found to be less than significant with Mitigation Measures RMDP/SCP-GRR-1 through RMDP/SCP-GRR-7: construction-related changes to drainage patterns that could result in erosion; long-term erosion and downstream deposition; reductions in geomorphic function (i.e., channel stability); and riverbed and floodplain scouring affecting riparian vegetation. Impacts related to seasonal flows in the “Dry Gap” and reductions in sediment delivered from the Santa Clara River to Ventura County beaches were determined to be less than significant.⁵⁶

Although focused primarily on water supply, **Section 4.3**, Water Resources, of the State-certified EIR also addressed groundwater supply, groundwater recharge, and groundwater quality. As determined therein, adequate water supplies would be available to meet the potable and non-potable water demands of the 2017 Approved Project without resulting in environmental impacts to the Santa Clara River, the local groundwater basins, or downstream users in Ventura County. All related impacts would be less than significant, and no mitigation was required.⁵⁷

As determined in **Section 4.4**, Water Quality, of the State-certified EIR, Entrada impacts with regard to surface water and groundwater quality would be less than significant with implementation of Mitigation Measures RMDP/SCP-WQ-1 and RMDP/SCP-WQ-2.⁵⁸

⁵⁵ See State-certified EIR, pages 4.1-57 and 4.1-123.

⁵⁶ See State-certified EIR, pages 4.2-93-98 and 4.2-266-273.

⁵⁷ See State-certified EIR, pages 4.3-91-92 and 4.3-127.

⁵⁸ See State-certified EIR, pages 4.4-110-123 and page 4.4-181.

VCC Planning Area

Section 4.1, Surface Water Hydrology and Flood Control, of the State-certified EIR determined that hydrology impacts related to flooding/flood hazards and storm water conveyance within the VCC Planning Area would be less than significant.⁵⁹ Nonetheless, Mitigation Measures RMDP/SCP-HY-1 through RMDP/SCP-HY-7 (not all of which are applicable to development within VCC) were adopted to ensure no flood hazards would occur. In addition, Mitigation Measures VCC-HY-1 through VCC-HY-3 were previously adopted by the County and would apply.

As evaluated in **Section 4.2**, Geomorphology and Riparian Resources, of the State-certified EIR, within the VCC Planning Area, the following impacts were found to be less than significant with Mitigation Measures RMDP/SCP-GRR-1 through RMDP/SCP-GRR-7: construction-related changes to drainage patterns that could result in erosion; long-term erosion and downstream deposition; reductions in geomorphic function (i.e., channel stability); and riverbed and floodplain scouring affecting riparian vegetation. Impacts related to seasonal flows in the “Dry Gap” and reductions in sediment delivered from the Santa Clara River to Ventura County beaches were determined to be less than significant.⁶⁰

Section 4.3, Water Resources, of the State-certified EIR found that impacts to groundwater supply, groundwater recharge, and groundwater quality would be less than significant. Although no mitigation was required, the County’s previously adopted Mitigation Measures VCC-WR-1 through VCC-WR-5 would apply.⁶¹

As determined in **Section 4.4**, Water Quality, of the State-certified EIR, VCC impacts with regard to surface water and groundwater quality would be less than significant with implementation of Mitigation Measures RMDP/SCP-WQ-1 and RMDP/SCP-WQ-2.⁶²

Evaluation of Hydrology and Water Quality Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
Would the project:			
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The State-certified EIR addressed potential hydrology and water quality impacts at a programmatic level. Supplemental analysis based on current tract map/parcel map design is required, including review and approval of a Drainage Concept/Hydrology Study and Low Impact Development (LID) Plan by the County Department of Public Works. Therefore, the potential water quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

⁵⁹ See State-certified EIR, pages 4.1-57 and 4.1-123.

⁶⁰ See State-certified EIR, pages 4.2-93-98 and 4.2-266-273.

⁶¹ See State-certified EIR, pages 4.3-91-92 and 4.3-127.

⁶² See State-certified EIR, pages 4.4-110-123 and page 4.4-181.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The State-certified EIR concluded groundwater recharge impacts to be less than significant. The Modified Project does not include any modifications from the 2017 Approved Project that would increase impacts related to groundwater recharge. The Modified Project would not decrease groundwater supplies or interfere substantially with groundwater recharge as compared to the 2017 Approved Project. The Santa Clarita Valley Groundwater Sustainability Agency is responsible for sustainably managing groundwater in the Santa Clara River Valley East Subbasin, within which the Modified Project Site is located. The agency is planning to develop by January 2022 a Groundwater Sustainability Plan to maintain and improve resource management, with the overall goal to achieve sustainable groundwater management within 20 years.⁶³ Locally in the Santa Clarita Valley, about half of the water supply is produced by local groundwater.⁶⁴ The Project Site is not located in an area known to have an inadequate public water supply to meet domestic needs or to have an inadequate groundwater supply. In addition, no municipal groundwater supply wells would be installed as part of the Modified Project.

Like the 2017 Approved Project, the Modified Project Site is primarily undeveloped, and development of the Entrada and VCC Planning Areas would introduce new impervious surfaces. However, several factors would counter the impact of urbanization on groundwater recharge, including an infiltration recharge from LID water quality facilities (e.g., vegetation swales) and irrigation recharge. As the Entrada and VCC Planning Areas fall within the same disturbance footprints analyzed in the State-certified EIR and reflect the same general scope and intensity of development, including land use types, floor area, and associated impervious areas, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts relative to groundwater supplies and groundwater recharge. No additional analysis in the Supplemental EIR is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The State-certified EIR addressed potential hydrology and water quality impacts at a programmatic level. Supplemental analysis based on current tract map/parcel map design is required, including review and approval of a Drainage Concept/Hydrology Study and LID Plan by the County Department of Public Works. Therefore, the potential water quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

⁶³ Santa Clarita Valley Groundwater Sustainability Agency, www.scvgsa.org, accessed May 13, 2021.

⁶⁴ *Ibid.*

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
(ii) Substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or offsite?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The State-certified EIR addressed potential hydrology and water quality impacts at a programmatic level. Supplemental analysis based on current tract map/parcel map design is required, including review and approval of a Drainage Concept/Hydrology Study and LID Plan by the County Department of Public Works. Therefore, the potential water quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

(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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The State-certified EIR addressed potential hydrology and water quality impacts at a programmatic level. Supplemental analysis based on current tract map/parcel map design is required, including review and approval of a Drainage Concept/Hydrology Study and LID Plan by the County Department of Public Works. Therefore, the potential water quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

(iv) Impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The State-certified EIR addressed potential hydrology and water quality impacts at a programmatic level. Supplemental analysis based on current tract map/parcel map design is required, including review and approval of a Drainage Concept/Hydrology Study and LID Plan by the County Department of Public Works. Therefore, the potential water quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

d) Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The State-certified EIR addressed potential hydrology and water quality impacts at a programmatic level. Supplemental analysis based on current tract map/parcel map design is required, including review and approval of a Drainage Concept/Hydrology Study and LID Plan by the County Department of Public Works. Therefore, the potential water quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
e) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The State-certified EIR addressed potential hydrology and water quality impacts at a programmatic level. Supplemental analysis based on current tract map/parcel map design is required, including review and approval of a Drainage Concept/Hydrology Study and LID Plan by the County Department of Public Works. Therefore, the potential water quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

f) 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. As previously discussed and consistent with the analysis provided in **Section 4.13, Geology and Soils**, of the State-certified EIR, Modified Project development within the Entrada and VCC Planning Areas would not involve use of septic tanks or other alternative wastewater disposal systems, and no impact would occur. This issue will not be analyzed further in the Supplemental EIR.

g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The State-certified EIR concluded the project area is not located in a tsunami or seiche zone, and development would not occur within the 100-year flood zone.⁶⁵ The Modified Project does not include any modifications from the 2017 Approved Project that would change these conclusions. The Modified Project would not increase the risk of release of pollutants due to inundation as compared to the 2017 Approved Project. Neither the Entrada or VCC Planning Areas contain any land that falls within a 100-year floodplain. The Modified Project Site is not located near any body of water large enough to potentially create seiches during seismic activity, nor is the Pacific Ocean close enough to pose a tsunami risk to the Project Site. As it relates specifically to the VCC Planning Area, Castaic Dam is located on Castaic Lake to the north. In the event of dam failure, inundation waters would flow southerly along Castaic Creek to the north bank of the Santa Clara River. However, under the Modified Project, bank stabilization would be implemented, and development has been pulled back from Castaic Creek as compared to the 2017 Approved Project, which would protect and further stabilize the creek banks and minimize inundation hazards.

Therefore, the potential for the Modified Project to be affected by flooding, tsunami, or seiche would remain negligible. The Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts relative to these issues. This topic will not be evaluated in the Supplemental EIR.

⁶⁵ See State-certified Final EIR, page 4.1-39.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Water Quality Control Plan: Supplemental Analysis Required. The Modified Project's potential impacts related to conflicts with or obstruction of a water quality control plan will be evaluated further in the Supplemental EIR. In addition, review and approval of a Drainage Concept/Hydrology Study and LID Plan by the County Department of Public Works will be required.

Sustainable Groundwater Management Plan: Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. Please refer to Response to Question 10.b for discussion of the Santa Clarita Valley Groundwater Sustainability Agency's forthcoming Groundwater Sustainability Plan. As previously indicated, development within the Entrada and VCC Planning Areas would fall within the same disturbance footprints analyzed in the State-certified EIR and would involve the same general scope and intensity of development, including land use types, floor area, and related types of urban contaminants. The Modified Project would comply with any future applicable groundwater sustainability requirements. Additionally, like the 2017 Approved Project, BMPs would be implemented during both construction and operation of the Modified Project. Also, like the 2017 Approved Project, the Modified Project would be subject to Mitigation Measures RMDP/SCP-WQ-1 and RMDP/SCP-WQ-2, which would reduce water quality and groundwater impacts. As the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts, this topic will not be further evaluated in the Supplemental EIR.

11. LAND USE AND PLANNING

Summary of State-Certified EIR Analysis of Land Use and Planning

Section 4.14, Land Use, of the State-certified EIR analyzed impacts related to land use and planning resulting from the development of the Entrada and VCC Planning Areas.

Entrada Planning Area

The State-certified EIR determined that impacts related to the division of an established community and conflicts with an applicable habitat conservation plan or natural community conservation plan would be less than significant.⁶⁶ However, development of the Entrada Planning Area under the 2017 Approved Project was found to result in a significant and unavoidable impact associated with conflicts with an applicable land use plan, policy, or regulation since establishment of a spineflower preserve would conflict with the site's then-existing agricultural zoning.⁶⁷ This impact was acknowledged to likely be temporary pending the County's approval of a zone change but was nonetheless concluded to be significant and unavoidable as implementation of the zone change was beyond the control of the Applicant. No feasible mitigation was identified.

Since publication of the State-certified EIR, a zone change has been implemented by the County for the Entrada Planning Area, which now includes land zoned R-1—Single-Family Residence, C-3—Unlimited Commercial, and C-R—Commercial Recreation. In addition, the spineflower preserve within the Entrada Planning Area has been permanently dedicated on-site.

VCC Planning Area

The State-certified EIR determined all land use impacts associated with development of the VCC Planning Area would be less than significant, and no mitigation was required.

Evaluation of Land Use and Planning Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
Would the project:			
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. Like the 2017 Approved Project, the Modified Project would not physically divide an established community.

Entrada Planning Area

The Entrada Planning Area is currently vacant, and the adjacent established Westridge community to the south is distinct and self-contained. Modified Project development would remain within the development footprint analyzed in the State-certified EIR—with the exception of the 0.6-acre previously disturbed golf course area on The Oaks Club at Valencia golf course, which will be temporarily disturbed to allow for a storm drain connection and fully restored following construction—and would not introduce barriers,

⁶⁶ See State-certified EIR, page 4.14-16.

⁶⁷ See State-certified EIR, page 4.14-12.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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roadways, or other infrastructure improvements that would bisect or transect the surrounding existing or planned communities. In fact, the Modified Project would create a more cohesive community and be integrated with the adjacent Mission Village community to the west, which is currently under construction. Connectivity to the proposed Entrada North development to the north also would be provided. Accordingly, the Modified Project would not result in any new or more significant land use impacts related to this issue. This topic will not be further evaluated in the Supplemental EIR.

VCC Planning Area

The VCC Planning Area is surrounded by existing single-family residential and industrial uses to the north, and the previously developed portions of VCC are located to the immediate west. Development within the VCC Planning Area would remain within the development footprint analyzed in the State-certified EIR and would represent a continuation of the non-residential development pattern previously established within VCC. Accordingly, the Modified Project would not physically divide an established community and thus would not result in any new or more significant land use impacts related to this issue. This topic will not be further evaluated in the Supplemental EIR.

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? ☐ ☒ ☐

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Like the 2017 Approved Project, the Modified Project would not be inconsistent with the applicable County plans for the Project Site. The OVOV Area Plan designates the Entrada Planning Area as H5—Residential 5 south of Magic Mountain Parkway; CM—Major Commercial north of Magic Mountain Parkway; and OS-PR—Parks and Recreation south of the Southern California Edison electric transmission lines. The VCC Planning Area is designated as IO—Industrial Office. These land use designations allow for development of the proposed uses under the Modified Project. No General Plan or Area Plan amendments are required within either planning area to implement the Modified Project. Therefore, the Modified Project would not result in any new or more significant land use impacts related to this issue, and no further analysis is required.

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

Supplemental Analysis Required. The Modified Project's potential land use impacts associated with this topic for be evaluated further in the Supplemental EIR.

12. MINERAL RESOURCES

Summary of State-Certified EIR Analysis of Mineral Resources

Entrada and VCC Planning Areas

Section 4.13, Geology and Geologic Hazards, of the State-certified EIR analyzed impacts to mineral resources resulting from development of the Entrada and VCC Planning Areas. The analysis concluded that no impact would occur regarding mineral resources for either planning area.⁶⁸

Evaluation of Mineral Resources Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
Would the project:			
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts to mineral resources as compared to the 2017 Approved Project. As discussed above, the State-certified EIR concluded the 2017 Approved Project would have no impact related to the loss of availability of a known mineral resource. The Modified Project does not include any modifications from the 2017 Approved Project that would increase impacts related to the loss of a known mineral resource. The California Geological Survey (CGS) classifies the significance of mineral resources in accordance with the California Surface Mining and Reclamation Act (SMARA) of 1975. More specifically, the State Geologist is responsible for classifying areas within California that are subject to urban expansion or other irreversible land uses. Of the four Mineral Resource Zone (MRZ) categories, lands classified as MRZ-2 are considered to be of regional or statewide significance. Such areas are underlain by significant mineral deposits or exhibit a highly likelihood of their presence. The Entrada Planning Area is located entirely within the MRZ-3 zone, which indicates an area of undetermined mineral resource significance; there are no active mineral extraction areas within the site. In addition, the western portion of the Entrada Planning Area is underlain by an oil and natural gas field known as Castaic Junction Field, but extraction operations were abandoned in the late 1990s. The portions of the VCC Planning Area within the floodplains of Castaic Creek and the Santa Clara River are designated as MRZ-2. Quarrying of sand and gravel in this area in the past created erosion problems, and pursuit of these resources as a marketable product ended approximately 50 years ago.

As previously indicated, development of the Entrada and VCC Planning Areas would remain within the development footprints analyzed in the State-certified EIR, and the County already has made the policy-level decision to preclude mineral resource extraction/removal from the planning areas by designating these sites for urban land uses. As such, like the 2017 Approved Project, the Modified Project would result in no impact relative to the loss of availability of a known mineral resource or a locally important mineral resource recovery site. Moreover, ongoing oil and gas extraction activities within the surrounding area and any potential future extraction from beneath the Entrada site would not be hindered by Modified Project development. Thus, the Modified Project would not result in new or more severe significant impacts relative

⁶⁸ See State-certified EIR, pages 4.13-38 and 40.

<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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to mineral resources, and no additional analysis in the Supplemental EIR is required.

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?

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Please refer to Response to Question 12.a above. As discussed therein, all past mineral extraction within the Entrada and VCC Planning Areas has ceased, and the County has made the policy-level decision to preclude mineral resource extraction/removal by designating these sites for urban land uses. As such, the Modified Project would not result in new or more severe significant impacts relative to mineral resources, and no additional analysis in the Supplemental EIR is required.

13. NOISE

Summary of State-Certified EIR Analysis of Noise

Section 4.9, Noise, of the State-certified EIR analyzed the noise impacts resulting from development of the Entrada and VCC Planning Areas. A variety of impact types were addressed, including temporary construction-related noise and vibration impacts, long-term noise impacts associated with both on-site operations and off-site sources (i.e., vehicular traffic), as well as impacts affecting both on- and off-site sensitive receptors.

Entrada Planning Area

The State-certified EIR concluded the following impacts would be less than significant with mitigation: exposure of people to noise levels in excess of locally adopted standards; exposure of people to excessive ground-borne noise levels or vibration; a substantial permanent increase in ambient noise levels in the vicinity; a substantial temporary or periodic increase in ambient noise levels in the vicinity; exposure of on- or off-site occupants to Project-related construction noise levels in excess of the Los Angeles County Noise Ordinance standards for construction noise; construction activity, including vibratory and impact pile driving, causing a peak particle velocity (PPV) above 0.01 inch/second (in/sec) at a sensitive receptor and/or between 0.2 and 2.0 in/sec at nearby structures; exposure of on-site exterior frequent use areas at noise-sensitive receptors to noise levels above the normally acceptable levels identified in the State Land Use Compatibility Guidelines or exposure of residences located within mixed use/commercial areas (i.e., residences with no backyards or parks as an exterior frequent use area) to interior noise levels above 45 A-weighted decibels (dBA); exposure of Project occupants to noise levels originating on- or off-site that are above the County Noise Ordinance standards; exposure of off-site sensitive receptors to an increase of 5 dBA or greater in noise level from Project-related activities, even if levels remain within the same land use compatibility classification (e.g., noise levels remain within the normally acceptable range); exposure of off-site sensitive receptors to an increase of 3 dBA or greater in noise level from Project-related activities, which results in a change in land use compatibility classification (e.g., noise levels change from normally acceptable to conditionally acceptable); and exposure of off-site sensitive receptors to an increase in noise levels greater than one dBA where existing noise levels are already considered unacceptable.⁶⁹ Since the Entrada Planning Area is not located within an airport land use plan or within 2 miles of a public or private airport or airstrip, the 2017 Approved Project would not expose people residing or working in the project area to excessive noise levels associated with airport-related uses.⁷⁰

VCC Planning Area

The State-certified EIR concluded the following impacts would be less than significant with mitigation, including measures VCC-NOI-1 through VCC-NOI-4 previously adopted by the County: exposure of people to noise levels in excess of locally adopted standards; a substantial permanent increase in ambient noise levels in the vicinity; a substantial temporary or periodic increase in ambient noise levels in the vicinity; exposure of on-site exterior frequent use areas at noise-sensitive receptors to noise levels above the normally acceptable levels identified in the State Land Use Compatibility Guidelines or exposure of residences located within mixed use/commercial areas (i.e., residences with no backyards or parks as an exterior frequent use area) to interior noise levels above 45 dBA; exposure of Project occupants to noise levels originating on- or off-site that are above the County Noise Ordinance standards; exposure of off-site sensitive receptors to an increase of 5 dBA or greater in noise level from Project-related activities, even if levels remain within the same land use compatibility classification (e.g., noise levels remain within the normally acceptable range);

⁶⁹ See State-certified EIR, pages 4.9-81-84.

⁷⁰ See State-certified EIR, page 4.9-27.

exposure of off-site sensitive receptors to an increase of 3 dBA or greater in noise level from Project-related activities, which results in a change in land use compatibility classification (e.g., noise levels change from normally acceptable to conditionally acceptable); and exposure of off-site sensitive receptors to an increase in noise levels greater than one dBA where existing noise levels are already considered unacceptable. Less than significant impacts were found for the following: exposure of people to excessive ground-borne noise levels or vibration; exposure of on- or off-site occupants to Project-related construction noise levels in excess of the Los Angeles County Noise Ordinance standards for construction noise; and construction activity, including vibratory and impact pile driving, causing a PPV above 0.01 in/sec at a sensitive receptor and/or between 0.2 and 2.0 in/sec at nearby structures.⁷¹ Since the VCC Planning Area is not located within an airport land use plan or within 2 miles of a public or private airport or airstrip, the 2017 Approved Project would not expose people residing or working in the project area to excessive noise levels associated with airport-related uses.⁷²

Evaluation of Noise Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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"/>

Supplemental Analysis Required. The Modified Project's potential noise impacts associated with this topic will be evaluated further in the Supplemental EIR.

b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. Groundborne vibration and noise impacts associated with the 2017 Approved Project were related to the use of pile driving construction.⁷³ As no pile driving would be required to construct the Modified Project, no groundborne vibration or noise would be generated from such activities. While the use of other construction equipment under the Modified Project could generate some level of groundborne vibration and noise, such impacts would be the same or less than those associated with the 2017 Approved Project. Furthermore, groundborne vibration decreases rapidly with distance, and the nearest off-site sensitive (residential) receptors within the Westridge community would be located approximately 350 feet from construction activity within the Entrada Planning Area due to the intervening Southern California Edison electric transmission corridor along the southern boundary of the site. In addition, the nearest future buildings within the Mission Village project to the west would be approximately 40 feet to the closest Project construction area. Although residential uses in the Live Oak community are located directly adjacent to the VCC northern boundary, most of the northern site area is planned as open space (generally associated with

⁷¹ See State-certified EIR, pages 4.9-81-84.

⁷² See State-certified EIR, page 4.9-27.

⁷³ See State-certified EIR, pages 4.9-34-38.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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Castaic Creek and Hasley Creek) and thus little construction work would occur in close proximity to any off-site sensitive receptors. Based on reference vibration levels from typical heavy construction equipment operations that would be used during Modified Project construction, which range from 0.003 inch per second peak particle velocity (PPV) for a small bulldozer to 0.210 inch per second PPV for a vibratory roller at 25 feet from the equipment, the anticipated vibration values would be well below those typically associated with pile driving (0.644 and 1.518 inch per second PPV at 25 feet).^{74,75} Therefore, the Modified Project would not result in new or more severe significant impacts, and no further analysis of this issue is required. Mitigation Measure RMDP/SCP-NOI-1 would not apply, as pile driving would not occur.

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?

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No Impact. As previously discussed, the Entrada and VCC Planning Areas are not located within an airport land use plan or within 2 miles of a public or private airport or airstrip or a public use airport. Since Modified Project development within the Entrada and VCC Planning Areas would fall within the same disturbance footprints analyzed in the State-certified EIR, no impacts related to aircraft or airport noise would occur.⁷⁶ The Modified Project would not result in new or more severe significant impacts, and this topic will not be further evaluated in the Supplemental EIR.

⁷⁴ Reference vibration levels excerpted from FTA, Transit Noise and Vibration Impact Assessment, Table 12-2, 2006.

⁷⁵ Pile driving vibration levels from Table 4.9-10 in Section 4.9, Noise, of the State-certified EIR.

⁷⁶ See State-certified EIR, page 4.9-27.

14. POPULATION AND HOUSING

Summary of State-Certified EIR Analysis of Population and Housing

Entrada and VCC Planning Areas

Section 4.19, Socioeconomics and Environmental Justice, of the State-certified EIR analyzed impacts relating to population and housing resulting from the development of the Entrada and VCC Planning Areas. No impacts were found with respect to creating disproportionate, adverse environmental effects on a minority or low-income population; or the displacement of substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere.⁷⁷

In addition, Section 7, Significant Irreversible Changes, Growth Inducing Impacts, and Federal Impact Considerations, discussed the potential growth-inducing effects of the 2017 Approved Project and concluded that development of the Entrada and VCC Planning Areas would not result in growth-inducing impacts.⁷⁸

Evaluation of Population and Housing Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</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 checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
The Modified Project would not increase residential development or induce population growth beyond that previously projected and analyzed in the State-certified EIR.

Entrada Planning Area

Like the 2017 Approved Project, the Modified Project would not induce substantial unplanned population growth in the Entrada Planning Area. As previously discussed, the Entrada Planning Area is designated in the OVOV Area Plan as H5—Residential 5 south of Magic Mountain Parkway and CM—Major Commercial north of Magic Mountain Parkway, with a small portion designated OS-PR—Parks and Recreation south of the Southern California Edison electric transmission lines. As the Modified Project’s uses are consistent with these designations, such development as well as the associated population have been, generally speaking, anticipated and planned for in the OVOV Area Plan. The construction of new residential units in the Entrada Planning Area would contribute to housing stock in the rapidly growing Santa Clarita Valley and would consequently increase property and sales tax revenue. Further, proposed development within the Entrada Planning Area falls within the disturbance footprint analyzed in the State-certified EIR and would be consistent with the general scope and intensity of development that was studied in the State-certified EIR. More specifically, while the Modified Project represents a reduction of 151 residential units as compared to the 2017 Approved Project, it includes an increase of 280,000 square feet of non-residential development,

⁷⁷ See State-certified EIR, pages 4.19-15-16.

⁷⁸ See State-certified EIR, pages 7.0-6-7.

<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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for an estimated net reduction of 3,187 square feet compared to the Entrada development evaluated in the State-certified EIR.⁷⁹ As such, the Modified Project would not result in new or more severe significant impacts relative to population growth, and this topic will not be further evaluated in the Supplemental EIR.

VCC Planning Area

Like the 2017 Approved Project, the Modified Project would not induce substantial unplanned population growth in the VCC Planning Area. The VCC Planning Area is designated in the OVOV Area Plan as IO—Industrial Office, which allows for development of the proposed uses. Furthermore, the Modified Project represents buildout of a portion of the previously approved and partially constructed Valencia Commerce Center, which was the subject of a 1991 EIR certified by the County. Accordingly, VCC development has been anticipated and is already planned for. As Modified Project development within the VCC Planning Area falls within the same disturbance footprint analyzed in the State-certified EIR and would be consistent with the general scope and intensity of development that was studied in the State-certified EIR, the Modified Project would not result in new or more severe significant impacts relative to population growth. This topic will not be further evaluated in the Supplemental EIR.

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

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No Impact. As there are no existing residences or residents located on either the Entrada or VCC Planning Areas, implementation of the Modified Project would not result in the removal of housing or the displacement of people. Therefore, like the 2017 Approved Project, the Modified Project would not result in new or more severe significant impacts relative to the displacement of substantial numbers of existing people or housing. This topic will not be further evaluated in the Supplemental EIR.

⁷⁹ The 2017 Approved Project includes 1,725 dwelling units (estimated to comprise 3,235,100 square feet) plus 450,000 square feet of non-residential development within the Entrada Planning Area, while the Modified Project includes 1,574 dwelling units (estimated at 2,951,913 square feet) and 730,000 square feet of non-residential development. As such, this analysis considers the environmental implications of reducing the number of residences by 151 units and increasing the amount of non-residential development by 280,000 square feet, for a net reduction of roughly 3,187 square feet compared to the Entrada development evaluated in the State-certified EIR.

15. PUBLIC SERVICES

Summary of State-Certified EIR Analysis of Public Services

Entrada and VCC Planning Areas

Section 4.18, Public Services, of the State-certified EIR analyzed impacts to public services, including fire protection, sheriff protection, schools, Emergency Medical Services, and libraries, resulting from the development of the Entrada and VCC Planning Areas. The analysis determined that development of the planning areas would result in an increase in urban-density, mixed-use residential and commercial development in an area with a baseline condition that was predominantly undeveloped and did not require extensive use of or demand for public services. The new urban land uses would result in additional demand for public services. However, the State-certified EIR concluded that development of the Entrada and VCC Planning Areas would have less than significant impacts with implementation of mitigation, including the measures set forth in Appendix IS-1 of this Initial Study; and in the VCC Planning Area, measures VCC-PS-1 through VCC-PS-7, which were previously adopted by the County.⁸⁰

Section 4.16, Parks, Recreation, and Trails, of the State-certified EIR analyzed impacts to parks and recreational facilities resulting from the development of the Entrada and VCC Planning Areas. Impacts were found to be less than significant given that sufficient on-site park and recreational facilities would be provided within the Entrada Planning Area, in addition to facilities proposed throughout the Newhall Ranch Specific Plan area.⁸¹

Project Design Features of the Modified Project (Entrada and VCC Planning Areas)

The Modified Project includes the following project design features relevant to public services to provide additional environmental benefits within the Entrada and VCC Planning Areas:

- PDF-PS-1: Any gated entrances to the Project Site subareas shall incorporate a Knox-Box entry system or equivalent.
- PDF-PS-2: The Project Applicant, its successors or designees shall notify the Los Angeles County Sheriff's Department and California Highway Patrol prior to any Project-related lane closures or other road construction and ensure emergency access remains clear and unobstructed.
- PDF-PS-3: During construction, construction signs shall be posted with a reduced construction zone speed limit per guidance from the California Highway Patrol.
- PDF-PS-4: Upon completion, the Applicant shall provide the Santa Clarita Valley Station Commander with a diagram of each portion of the Project Site, including building entries and access routes.
- PDF-PS-5: Prior to commencement of construction, the Project Applicant shall retain the services of a private security company to patrol the construction site(s), as necessary, to minimize the potential for trespass, theft, and other unlawful activity.

⁸⁰ See State-certified EIR, page 4.18-27.

⁸¹ See State-certified EIR, page 4.16-21.

- PDF-PS-6: The developer of future subdivisions which allow construction shall comply with the terms and conditions of the School Facilities Funding Agreement between The Newhall Land and Farming Company and the Newhall School District.
- PDF-PS-7: The developer of future subdivisions which allow construction shall comply with the terms and conditions of the School Facilities Funding Agreement between The Newhall Land and Farming Company and the William S. Hart Union High School District.
- PDF-PS-8: The developer of future subdivisions which allow construction shall comply with the terms and conditions of the School Facilities Funding Agreement between The Newhall Land & Farming Company and the Castaic Union School District.
- PDF-PS-9: The developer of future subdivisions which allow construction shall comply with the terms and conditions of the School Facilities Funding Agreement between The Newhall Land & Farming Company and the Saugus Union School District.

Evaluation of Public Services Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:			

Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The Modified Project's potential impacts related to fire protection will be evaluated further in the Supplemental EIR as part of the wildfire impact analysis.

Sheriff protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The Modified Project would not increase impacts related to the provision of sheriff services as compared to the 2017 Approved Project. As discussed above, the State-certified EIR concluded the 2017 Approved Project would have less than significant impacts with mitigation related to the provision of law enforcement services. The Modified Project does not include any modifications from the 2017 Approved Project that would increase impacts related to the provision of law enforcement services. The Project Site is served by the Santa Clarita Sheriff Station located at 23740 Magic Mountain Parkway within the City of Santa Clarita, as well as the Newhall Area California Highway Patrol (CHP) Station located at 28648 The Old Road. In addition, construction of a new Sheriff Station on the west side of the Santa Clarita Valley is anticipated as development planned in the area progresses.

As discussed above, the Modified Project represents a slight reduction in floor area compared to the Entrada development evaluated in the State-certified EIR, while VCC development remains unchanged. Further, the land uses proposed within the Entrada and VCC Planning Areas would fall within the same development

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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footprints analyzed in the State-certified EIR and would be consistent with the general scope and intensity of development that was studied in the State-certified EIR. As such, with implementation of mitigation from the County-certified EIR, the demand for sheriff protection generated by the Modified Project would be roughly the same or even slightly reduced compared to that of the 2017 Approved Project. Therefore, the Modified Project would not result in new or more severe significant impacts relative to sheriff protection, and this topic will not be further evaluated in the Supplemental EIR.

Additionally, the project design features listed above would serve to reduce demand for sheriff services and thus reduce associated impacts; these measures are detailed in Appendix IS-1 of this Initial Study and will be incorporated into the MMRP for the Modified Project. PDF-PS-1 through PDF-PS-9 are beneficial and are not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

Schools?

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to the provision of school services as compared to the 2017 Approved Project. As discussed above, the State-certified EIR concluded the 2017 Approved Project would have less than significant impacts related to the provision of school services. The Modified Project does not include any modifications to the 2017 Approved Project that would increase impacts related to the provision of school services. The Project Site is served by the schools of the Castaic Union School District, Newhall School District, William S. Hart Union School District, and Saugus Union School District. The Applicant has entered into School Facilities Funding Agreements with all four school districts, and a potential elementary school site is reserved within the Entrada Planning Area. The Castaic Union School District service area is located north of the Santa Clara River, and thus serves the VCC Planning Area; however, as residential development is not proposed within VCC, any student generation resulting from its development would be negligible.

As discussed above, the Modified Project represents a slight reduction in residential units and total floor area compared to the Entrada development evaluated in the State-certified EIR, while VCC development remains unchanged. Further, the land uses proposed within the Entrada and VCC Planning Areas would be consistent with the general scope and intensity of development that was studied in the State-certified EIR. As such, the demand for schools generated by the Modified Project would be roughly the same or even slightly reduced compared to that of the 2017 Approved Project. As such, the Modified Project would not result in new or more severe significant impacts relative to schools, and this topic will not be further evaluated in the Supplemental EIR.

Additionally, the project design features listed above would be implemented to reduce impacts further; these measures are detailed in Appendix IS-1 of this Initial Study and will be incorporated into the MMRP for the Modified Project. PDF-PS-1 through PDF-PS-9 are beneficial and are not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

Parks?

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to the provision of parks as compared to the 2017 Approved Project. As discussed above, the State-certified EIR concluded the 2017 Approved Project would have less than significant impacts related to the provision of parks. The Modified Project does not include any modifications to the 2017 Approved Project that would increase impacts related to the provision of

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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parks. Numerous existing and proposed parks and recreational facilities are located in the vicinity of the Modified Project Site, including facilities maintained by the federal government, the State of California, the County, Ventura County, and the City of Santa Clarita. In addition, there are four private golf courses in the surrounding area, including The Oaks Club at Valencia, located immediately south of the Entrada Planning Area. There is also an extensive public trail system in the area, plus a planned network of trails throughout the Newhall Ranch Specific Plan area immediately west of Entrada and a County-proposed regional trail along the Santa Clara River. It is noted that a neighborhood park and private recreational amenities are proposed within the Entrada Planning Area and a multi-purpose trail is proposed within VCC as part of the Modified Project, in addition to several parks and other facilities that are planned/proposed throughout Newhall Ranch.

As discussed above, the Modified Project represents a slight reduction in residential units and total floor area compared to the Entrada development evaluated in the State-certified EIR, while VCC development remains unchanged. Further, the land uses proposed within the Entrada and VCC Planning Areas would be consistent with the general scope and intensity of development that was studied in the State-certified EIR. As such, the demand for parks generated by the Modified Project would be roughly the same or even slightly reduced compared to that of the 2017 Approved Project. As such, the Modified Project would not result in new or more severe significant impacts relative to parks, and this topic will not be further evaluated in the Supplemental EIR.

Additionally, the project design features listed above would be implemented to reduce impacts; these measures are detailed in Appendix IS-1 of this Initial Study and will be incorporated into the MMRP for the Modified Project. PDF-PS-1 through PDF-PS-9 are beneficial and are not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

Libraries?

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to the provision of library services as compared to the 2017 Approved Project. As discussed above, the State-certified EIR concluded the 2017 Approved Project would have less than significant impacts related to the provision of libraries. The Modified Project does not include any modifications to the 2017 Approved Project that would increase impacts related to the provision of libraries. The County of Los Angeles Public Library (County Library) provides library services to the Santa Clarita Valley area through three libraries and one bookmobile. The nearby branches include the Stevenson Ranch Library, Castaic Library, and Santa Clarita Valley Bookmobile. In compliance with County Code, the Project Applicant would pay the applicable Library Facilities Mitigation Fee in effect at the time residential building permits are issued for Entrada to offset demand for library services generated by its population. It is also noted that a future public library must be developed within the Newhall Ranch Specific Plan area, located just west of the Modified Project Site.

As discussed above, the Modified Project represents a slight reduction in residential units and total floor area compared to the Entrada development evaluated in the State-certified EIR, while VCC development remains unchanged. Further, the land uses proposed within the Entrada and VCC Planning Areas would be consistent with the general scope and intensity of development that was studied in the State-certified EIR. As such, the demand for libraries generated by the Modified Project would be roughly the same or even slightly reduced compared to that of the 2017 Approved Project. Additionally, the Project Applicant would pay the applicable Library Facilities Mitigation Fee, the purpose of which is “to mitigate any significant

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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adverse impacts of increased residential development upon public library facilities as required by” CEQA.⁸² As such, the Modified Project would not result in new or more severe significant impacts relative to libraries, and this topic will not be further evaluated in the Supplemental EIR.

Other public facilities?

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to the provision of other public services as compared to the 2017 Approved Project. As discussed above, the State-certified EIR concluded the 2017 Approved Project would have less than significant impacts related to the provision of other public facilities. The Modified Project does not include any modifications to the 2017 Approved Project that would increase impacts related to the provision of other public facilities. As discussed above, the Modified Project represents a slight reduction in residential units and total floor area compared to the Entrada development evaluated in the State-certified EIR, while VCC development remains unchanged. Further, the land uses proposed within the Entrada and VCC Planning Areas would be consistent with the general scope and intensity of development that was studied in the State-certified EIR. As such, the demand for public services generated by the Modified Project would be roughly the same or even slightly reduced compared to that of the 2017 Approved Project. As such, the Modified Project would not result in new or more severe significant impacts relative to other public services, and this topic will not be further evaluated in the Supplemental EIR.

⁸² Los Angeles County Code Section 22.72.010.

16. RECREATION

Summary of State-Certified EIR Analysis of Recreation

Entrada and VCC Planning Areas

Section 4.16, Parks, Recreation, and Trails, of the State-certified EIR analyzed impacts to parks and recreational facilities resulting from the development of the Entrada and VCC Planning Areas. The analysis determined that development of the planning areas would result in an increase in urban-density, mixed-use residential and commercial development in an area with a baseline condition that was predominantly undeveloped and did not require extensive use of or demand for parks and recreational facilities. The new urban land uses would generate additional demand for parks and recreational facilities; however, the State-certified EIR concluded that development of the Entrada and VCC Planning Areas would have a less than significant impact given that an on-site park and recreational facilities would be provided within the Entrada Planning Area, in addition to facilities proposed throughout the Newhall Ranch Specific Plan area.⁸³

Evaluation of Recreation Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</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 checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The Modified Project would not increase impacts related to parks or other recreational facilities as compared to the 2017 Approved Project. Please refer to Response to Question 15.d. As discussed therein, a number of existing public and private parks and recreational facilities are located in the general area, in addition to facilities planned and proposed throughout the area. As well, a neighborhood park and private recreational amenities are proposed within the Entrada Planning Area and a multi-purpose trail is proposed within VCC as part of the Modified Project. The Project Applicant would satisfy the County's Parkland Dedication Ordinance via the provision of park space with amenities equal to or greater in value than the established in-lieu park fee. No parkland dedication is required for VCC.

As discussed above, the Modified Project represents a slight reduction in residential units and total floor area compared to the Entrada development evaluated in the State-certified EIR, while VCC development remains unchanged. Further, the land uses proposed within the Entrada and VCC Planning Areas would be consistent with the general scope and intensity of development that was studied in the State-certified EIR. As such, the demand for parks and recreational facilities generated by the Modified Project would be roughly the same or even slightly reduced compared to that of the 2017 Approved Project. As such, the Modified Project would not result in new or more severe significant impacts relative to parks, and this topic will not be further evaluated in the Supplemental EIR.

⁸³ See State-certified EIR, page 4.16-21.

<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Please refer to Response to Questions 15.d and 16.a. The Modified Project would not increase impacts related to the construction or expansion of parks or other recreational facilities as compared to the 2017 Approved Project. As discussed therein, a neighborhood park and private recreational amenities are proposed within the Entrada Planning Area and a multi-purpose trail is proposed within VCC as part of the Modified Project. Impacts associated with the development of these facilities are addressed throughout this Initial Study in the context of impacts associated with the Modified Project as a whole. As these facilities are comparable to those assumed in the State-certified EIR, related impacts were previously addressed and would remain unchanged. As such, the Modified Project would not result in new or more severe significant impacts relative to parks, and this topic will not be further evaluated in the Supplemental EIR.

c) Would the project interfere with regional trail connectivity?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Please refer to Response to Questions 15.d. As discussed, there is an extensive public trail system in the area, plus a planned network of trails throughout the Newhall Ranch Specific Plan area immediately west of Entrada and a County-proposed regional trail along the Santa Clara River. The Modified Project would provide an extensive community trail system throughout the Entrada Planning Area, which would connect to the Newhall Ranch Specific Plan trail system to the west and the existing community of Westridge to the south. This proposed trail system would include community trails, paseos, recreational trails, neighborhood electric vehicle (NEV) trails, and bike lanes. Additionally, a multi-purpose trail is proposed within VCC. As these facilities are comparable to those assumed in the State-certified EIR, related impacts were previously addressed and would remain unchanged. As such, the Modified Project would not result in new or more severe significant impacts relative to trails, and this topic will not be further evaluated in the Supplemental EIR.

17. TRANSPORTATION

Summary of State-Certified EIR Analysis of Transportation

Entrada and VCC Planning Areas

Section 4.8, Traffic, of the State-certified EIR analyzed impacts to traffic resulting from the development of the Entrada and VCC Planning Areas. Specifically, the State-certified EIR evaluated whether the Project would: cause a County roadway segment to go from Level of Service (LOS) A through E to LOS F or a Ventura County roadway segment to go from LOS A through D to LOS E; increase the volume-to-capacity (v/c) ratio at an existing deficient condition location by 0.01 or more; or cause or contribute to a v/c of greater than 1.0 and increase the v/c by 0.020 or more.⁸⁴ All such impacts were determined to be less than significant with mitigation, including Mitigation Measures RMDP/SCP-TR-1 through RMDP/SCP-TR-18; and in Valencia Commerce Center, Mitigation Measures VCC-TR-1 through VCC-TR-17.⁸⁵

Project Design Features of the Modified Project (Entrada and VCC Planning Areas)

The Modified Project includes the following project design feature relevant to transportation, including emergency access:

- PDF-HM-1: Prior to any construction activities and/or issuance of required encroachment permits from the County of Los Angeles, the City of Santa Clarita, and/or Caltrans, a detailed Construction Traffic Management Plan shall be submitted to the relevant agency or agencies for review and approval, consistent with each agency's established codes and procedures. The Construction Traffic Management Plan shall include the following, as required by the applicable agency or agencies:
 - Provisions for traffic control during all phases of construction activities to improve traffic flow on public roadways (e.g., flag persons), as needed;
 - Scheduling construction activities to reduce the effect on traffic flow on arterial streets, including limiting construction worker arrivals immediately prior to opening hours at Six Flags Magic Mountain;
 - Provision of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers on streets impacted by Project construction;
 - Detour signs, as needed;
 - Provisions to configure construction parking to minimize traffic interference;
 - Provision of adequate emergency access to all residences and businesses adjacent to the roadways impacted by the roadway construction (mitigation) activities during all phases of construction activities;
 - Provisions to maintain emergency access at all times in the event temporary lane closures are necessary for the installation of utilities; and

⁸⁴ See State-certified EIR, pages 4.8-42-52.

⁸⁵ See State-certified EIR, page 4.8-113.

- With the exception of off-site infrastructure improvements, prohibition against parking of construction-related vehicles on streets in predominantly residentially zoned areas.

Evaluation of Transportation Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</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?

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Supplemental Analysis Required. The Modified Project's potential transportation impacts associated with this topic will be evaluated further in the Supplemental EIR, including review of a Traffic Impact Analysis by the County Department of Public Works.

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

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Supplemental Analysis Required. Pursuant to Senate Bill (SB) 743, the County adopted Transportation Impact Guidelines (Los Angeles County Public Works 2020) to include vehicle miles traveled (VMT) as the new metric to evaluate the significance of transportation impacts. These guidelines and thresholds apply to land use and transportation projects in the County that are subject to CEQA analysis. Therefore, this section uses VMT as the basis for evaluating transportation impacts of the proposed project under CEQA. The Modified Project's potential transportation impacts associated with this topic will be evaluated further in the Supplemental EIR, including review of a Traffic Impact Analysis by the County Department of Public Works.

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

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The modifications associated with the Modified Project would not result in changes to the roadway network or incompatible uses as compared to the 2017 Approved Project. As discussed above, the Modified Project's proposed uses match the 2017 Approved Project except for changes in the allocation of residential and non-residential uses within Entrada South. The proposed residential and non-residential uses would not increase hazards related to roadway use. Additionally, the proposed on-site roadways would not include road design features (e.g., sharp curves) or incompatible uses (e.g., farm equipment) that would substantially increase hazards. All roadway improvements would comply with County standards, including LACFD requirements. In particular, the on-site roadway network would be integrated with the broader roadway network throughout the westside of the Santa Clarita Valley, with connections to a number of existing and proposed arterials listed in the Los Angeles County Highway Plan (formerly known as the Master Plan of Highways) and the Newhall Ranch Specific Plan (Specific Plan). One primary roadway designated on the County Highway Plan is Magic Mountain Parkway, which is currently being extended west through the Entrada Planning Area as part of the planned Mission Village community to the immediate west. In addition, the Project would not result in incompatible uses, as the proposed uses are consistent with the types of residential and commercial land uses already present in the surrounding area. Refer to Response to Question 9.f for related discussion. In summary, the Modified Project would not result in new significant

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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impacts or increase the severity of previously identified significant impacts for this topic area; no additional analysis in the Supplemental EIR is required.

d) Result in inadequate emergency access?

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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Please refer to Response to Question 9.f, above. As discussed therein, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts with respect to emergency access. No additional analysis in the Supplemental EIR is required.

18. TRIBAL CULTURAL RESOURCES

Summary of State-Certified EIR Analysis of Tribal Cultural Resources

Entrada and VCC Planning Areas

Section 4.10, Cultural Resources, of the State-certified EIR analyzed impacts to cultural resources, including examples of the major periods of California history and interred human remains, resulting from the development of the Entrada and VCC Planning Areas and concluded that no impact would occur.⁸⁶ Nonetheless, the State-certified EIR outlined mitigation measures, including CR-3 through CR-6 which specify avoidance, monitoring, and data recovery requirements to be carried out by a qualified archaeologist and Native Americans, as well as VCC-CR-1 and VCC-CR-2 within the VCC Planning Area.

Evaluation of Tribal Cultural Resources Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The Modified Project's potential impacts to tribal and cultural resources associated with this topic will be evaluated further in the Supplemental 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The Modified Project's potential impacts to tribal and cultural resources associated with this topic will be evaluated further in the Supplemental EIR.

⁸⁶ See State-certified EIR, page 4.10-24.

19. UTILITIES AND SERVICE SYSTEMS

Summary of State-Certified EIR Analysis of Utilities and Service Systems

Entrada and VCC Planning Areas

Section 4.3, Water Resources, of the State-certified EIR analyzed impacts to water supply resulting from the development of the Entrada and VCC Planning Areas. The analysis determined that the Project's water demands would be satisfied by available, reliable water supplies, and impacts would be less than significant.⁸⁷ Nonetheless, VCC-WR-1 through VCC-WR-5 previously adopted by the County would apply in the VCC Planning Area.

Section 4.20, Solid Waste Services, of the State-certified EIR analyzed solid waste impacts resulting from the development of the Entrada and VCC Planning Areas. Impacts related to landfill capacity were found to be significant and unavoidable, while impacts associated with regulatory compliance would be less than significant with implementation of mitigation, including Mitigation Measure RMDP/SCP-SWS-1 and Mitigation Measure VCC-SWS-1 in the VCC Planning Area.⁸⁸

Evaluation of Utilities and Service Systems Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</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 drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The Modified Project would not increase the need to relocate or construct utilities as compared to the 2017 Approved Project. Similar to the 2017 Approved Project, the Modified Project incorporates all necessary utility improvements, including: potable and non-potable (recycled) water infrastructure on-site that would connect to Santa Clarita Valley Water Agency's existing local water distribution and supply system; an on-site network of gravity sewers connecting to the local trunk lines that are maintained by the Santa Clarita Valley Sanitation District and flow to the Valencia Water Reclamation Plant; a comprehensive series of drainage, flood control, and water quality improvements such as storm drains, debris basins, water quality facilities, and inlet and outlet structures designed to protect Project development in compliance with County Department of Public Works requirements and all applicable National Pollutant Discharge Elimination System (NPDES) permits; an on-site electrical system that would include underground electrical lines, conduits, banks, and transformers, as needed, with service provided from Southern California Edison's Saugus Substation; an on-site natural gas distribution system that would connect to the local Southern California Gas Company supply system; and necessary telecommunications facilities capable of serving proposed development. The Modified Project's utility improvements would take into account available capacity within the existing off-site systems and other relevant considerations such as pressure, treatment

⁸⁷ See State-certified EIR, pages 4.3-91-92.

⁸⁸ See State-certified EIR, page 4.20-22.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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capacity, and applicable requirements, while adhering to all necessary design standards.

As part of the Modified Project, the Santa Clarita Valley Sanitation District would need to annex the Entrada Planning Area into the District before sanitary services could be provided. In addition, the Entrada Planning Area would be annexed into the County's Consolidated Sewer Maintenance District, which maintains the local sewer lines in the area. Further, the Modified Project would comply with applicable provisions of the County's Green Building Standards Code (County Code Title 31), which addresses sustainability via appropriate infrastructure planning and design, water and energy conservation, and other related requirements; and the California Green Building Standards Code, commonly referred to as the CALGreen Code (CCR Title 24, Part 11). As also required, all necessary permits, agreements, and approvals would be obtained, and all utility connection fees would be paid as part of the Modified Project.

As previously discussed, the Modified Project would fall within the same development footprint as the 2017 Approved Project, and proposed development would be consistent in terms of land use, scale, and general location and design with that previously studied in the State-certified EIR. Accordingly, the utility improvements included as part of the Modified Project are generally the same as those anticipated under the 2017 Approved Project. In summary, Modified Project development would be consistent with the analysis provided in the State-certified EIR with respect to the provision of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunications facilities. Thus, the Modified Project would not cause any new or more severe significant impacts related to this topic, and no additional analysis in the Supplemental EIR is required.

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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Supplemental Analysis Required. The Modified Project's potential impacts to water supply will be evaluated further in the Supplemental EIR, including review and approval of a Water Supply Assessment by Santa Clarita Valley (SCV) Water.

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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Supplemental Analysis Required. The Modified Project's potential impacts to wastewater treatment capacity will be evaluated further in the Supplemental EIR.

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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Supplemental Analysis Required. The Modified Project's potential solid waste impacts will be evaluated further in the Supplemental EIR.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The Modified Project's potential solid waste impacts will be evaluated further in the Supplemental EIR.

20. Wildfire

Summary of State-Certified EIR Analysis of Wildfire

Entrada and VCC Planning Areas

Section 4.17, Hazards, Hazardous Materials, and Public Safety, of the State-certified EIR studied impacts pertaining to wildland fires resulting from the development of the Entrada and VCC Planning Areas. Such impacts were determined to be less than significant with implementation of Mitigation Measure RMDP/SCP-PH-7 regarding emergency access and Mitigation Measure RMDP/SCP-PH-14, which requires development of a Wildfire Fuel Modification Plan.⁸⁹

Evaluation of Wildfire Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</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) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to emergency response or evacuation as compared to the 2017 Approved Project. Please refer to Response to Question 9.f, above. As discussed therein, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts with respect to emergency access. No additional analysis in the Supplemental EIR is required.

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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The Modified Project's potential wildfire impacts will be evaluated further in the Supplemental EIR. The Supplemental EIR will include a wildfire protection analysis to evaluate wildfire risks, wildfire-related evacuation conditions, and measures designed to address such risks.

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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The Modified Project's potential impacts related to wildfire protection and infrastructure will be evaluated further in the Supplemental EIR.

⁸⁹ See State-certified EIR, page 4.17-61.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The Modified Project's potential impacts related to wildfire risks will be evaluated further in the Supplemental EIR.

e) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The Modified Project's potential impacts regarding wildland fires will be evaluated further in the Wildfire section of the Supplemental EIR. As stated above, the Supplemental EIR will include a wildfire protection analysis to evaluate wildfire risks, wildfire-related evacuation conditions, and measures designed to address such risks.

21. MANDATORY FINDINGS OF SIGNIFICANCE

- | | <i>Supplemental
Analysis
Required</i> | <i>Less Than Significant
Impact/No Changes or
New Information Requiring
Preparation of an EIR</i> | <i>No
Impact</i> |
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| 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"/> |

Supplemental Analysis Required. The Modified Project could result in potentially significant effects relative to the environmental categories identified above. Such effects will be analyzed in the Supplemental EIR.

- | | | | |
|--|-------------------------------------|--------------------------|--------------------------|
| b) 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)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|-------------------------------------|--------------------------|--------------------------|

Supplemental Analysis Required. The Modified Project could result in potentially significant cumulative impacts. The Supplemental EIR will analyze the Modified Project’s cumulative impacts in association with other current and reasonably foreseeable future projects for those environmental topics identified herein for further analysis in the Supplemental EIR.

- | | | | |
|---|-------------------------------------|--------------------------|--------------------------|
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|-------------------------------------|--------------------------|--------------------------|

Supplemental Analysis Required. The Modified Project could result in potentially significant direct and indirect adverse effects on humans. Potentially significant impacts related to air quality, biological resources, archaeological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, transportation/traffic, tribal cultural resources, utilities and service systems, and wildfire will be further analyzed in the Supplemental EIR.

Appendices



Appendix IS-1



Project Design Features and Mitigation Measures
for Issues Scoped Out in the Initial Study

APPENDIX IS-1

PROJECT DESIGN FEATURES AND MITIGATION MEASURES FOR ISSUES SCOPED OUT IN THE INITIAL STUDY

Project Design Features (PDFs)

PDFs are specific design and/or operational characteristics proposed by the Project Applicant that are incorporated to provide an environmentally beneficial effect. Because PDFs are incorporated into the project, they do not constitute mitigation measures. Even so, PDFs are incorporated into the Mitigation Monitoring and Reporting Program (MMRP) should it be approved by the County of Los Angeles to ensure that they are implemented as a part of the project.

Valencia Commerce Center (VCC) Mitigation Measures

The County of Los Angeles imposed mitigation measures to minimize impacts to various environmental resources areas when it certified the EIR and approved the Valencia Commerce Center (VCC) development in 1991. All applicable mitigation measures from the Mitigation Monitoring Program (MMP) adopted by the County in 1991 would continue to apply only to the VCC.

The County of Los Angeles imposed mitigation measures to minimize impacts to various environmental resource areas when it certified the EIR and approved the Valencia Commerce Center (VCC) development in 1991. All applicable mitigation measures from the Mitigation Monitoring Program (MMP) adopted by the County in 1991 would continue to apply only to the VCC Planning Area and would be included in the Mitigation Monitoring and Reporting Program (MMRP) for the project should it be approved by the County of Los Angeles.

Resource Management and Development Plan/Spineflower Conservation Plan (RMDP/SCP) Mitigation Measures

In conjunction with its approval of the State-certified EIR and Newhall Ranch RDMP/SCP (referred to in this Supplemental EIR as “the 2017 Approved Project”), the California Department of Fish and Wildlife (CDFW) adopted mitigation measures to minimize impacts related to various environmental resource areas. Numerous mitigation measures contained in CDFW’s adopted Mitigation Monitoring and Reporting Plan (MMRP) for the State-certified EIR and Newhall Ranch RDMP/SCP also apply to the project and would be carried forward into the MMRP for the project should it be approved by the County of Los Angeles.

Entrada South/Valencia Commerce Center (ES/VCC) Mitigation Measures

Mitigation measures designated at ES/VCC measures have been included and addressed in the Initial Study. These measures have been included in addition to the VCC and RMDP/SCP measures to reflect current situational needs and to provide an effective level of mitigation for issues scoped out in the Initial Study. These measures would be included in the MMRP for the project should it be approved by the County of Los Angeles.

AESTHETICS
Project Design Features
PDF-VR-1: During construction, temporary green screen construction fencing 6 feet tall shall be placed on-site adjacent to public roadways to screen much of the construction activity from view at street level.
PDF-VR-2: During construction, all security lighting shall be properly shielded and projected downwards such that light is focused on construction equipment or materials and not on adjacent roadways or off-site areas.
PDF-VR-3: Prior to issuance of a building permit, the Project Applicant shall submit Design Guidelines to the County of Los Angeles Department of Regional Planning. The Design Guidelines shall address such issues as site planning, architecture, walls and fencing, landscape design, lighting, signage, and general design themes for each of the major land use categories in the community. In particular, the Design Guidelines shall establish the following: <ul style="list-style-type: none"> • Major utility systems, including potable water, recycled water, wastewater, electricity, natural gas, and cable/internet, shall be placed underground. • Utility/service areas shall be treated (i.e., through the use of color, landscaping, screening, etc.) to minimize visual impact. • Rooftop equipment shall be screened from view from public streets. • Outdoor lighting within the Project Site shall be projected downwards to illuminate the intended surface and minimize light spillover and glare generation; and shall consist of low-intensity downlight or be equipped with louvers, shields, hoods, or other screening devices, as appropriate. • Only non-reflective or low-reflective building materials, or those treated with a standard non-reflective or low-reflective glazing, shall be used on building exteriors.
RMDP/SCP Mitigation Measures
RMDP/SCP-VR-1: Riprap shall be ungrouted and shall contain material with colors and textures that are harmonious with the surrounding natural riverbed and bank materials. The same or similar type, color, and size of riprap shall be used throughout the Project area.
RMDP/SCP-VR-2: Necessary grouted riprap and bridges shall contain materials with colors and textures that are harmonious with the surrounding natural riverbed and bank materials. The same or similar type, color, and size of riprap shall be used throughout the Project area.
VCC Mitigation Measures
VCC-VR-1: ¹ Development of the proposed project will be in accordance with design concepts specified in CUP 87-360. Guidelines have been developed to preserve key views and open space. Significant ridgetop areas totaling nearly 300 acres will be permanently allocated as natural open space.
VCC-VR-2: Over 40% of the site will be open space and include large areas of coastal sage scrub/chaparral vegetation, flood control channels, and the SCE easement.
VCC-VR-3: Graded areas that are not developed will be replanted with drought tolerant, fire resistant native and non-native species.
VCC-VR-4: Temporarily removed riparian vegetation will be replaced, so that there is no net loss of habitat.
VCC-VR-5: Oak trees will be removed and replaced per Oak Tree Ordinance requirements.
VCC-VR-6: Views of the project from Hasley Canyon Road and adjacent residences will be screened by landscaping, building height limitations, a combination berm/wall and building setbacks. Glare from building materials will be minimized by the use of glazing with low reflectivity characteristics.

¹ All VCC measures included herein are excerpted from the Mitigation Monitoring Program adopted at the September 17, 1991 Los Angeles County Board of Supervisors meeting, at which meeting the Board certified the VCC EIR (SCH No. 1987- 123005).

VCC-VR-7: Landforms and landscaping will be used to screen water tanks from view to the extent possible. Further, water tanks will be painted to match surrounding soil color whenever possible. <i>(This mitigation measure is not applicable as water tanks are not proposed in the Valencia Commerce Center Planning Area. No further action on this measure is required.)</i>
VCC-VR-8: The berm/wall along the residential portion of Backer Road will be landscaped to provide an aesthetically pleasant view. <i>(Compliance with this mitigation measure has been achieved as this berm/wall has already been constructed for this portion of the project. No further action on this measure is required.)</i>
VCC-VR-9: The area on the bluffs adjacent to the residential tract will be designated commercial. Separation between residents of the Live Oak community and buildings to the west on the bluffs will be provided through a minimum of 150-foot wide natural slope buffer (60 feet high) and a building setback of 50 feet. No buildings will directly abut and look over the residential area. A combination of landscaping, berms and/or walls will substantially screen buildings from view. <i>(Compliance with this mitigation measure has been completed and this mitigation measure does not apply to the Valencia Commerce Planning Area. No further action on this measure is required.)</i>
VCC-VR-10: The design concept for the proposed project employs architecture reflecting contemporary styles and materials. All roof equipment including heating, air conditioning and ventilation equipment, will be located or screened so as not to be visible from neighboring sites or adjacent streets.
VCC-VR-11: Landscaping will be used extensively to provide visual cohesiveness for the entire development, and to provide, where applicable, transitions between manmade features and native terrain.
VCC-VR-12: Outdoor lighting within the proposed project area will be placed and shielded so that it will not cause excessive glare or light spillage onto neighboring areas.
VCC-VR-13: Any project signage located at the Backer Road/The Old Road intersection shall be limited to "residentially oriented" monument signs. In addition, the words "commerce" or "industrial" shall not appear on any such sign. <i>(Compliance with this mitigation measure has been completed and this mitigation measure does not apply to the Valencia Commerce Planning Area. No further action on this measure is required.)</i>
VCC-VR-14: The Permittee shall provide a berm-residential security fence combination at the top of the slope for the C-3-DP property, the intent of which is to screen future commercial buildings from a certain "band" of homes within the adjacent residential tract. <i>(Compliance with this mitigation measure has been completed and this mitigation measure does not apply to the Valencia Commerce Planning Area. No further action on this measure is required.)</i>
VCC-VR-15: Buildings set behind the berm would be screened by a berm-fence varying in total height. The "band of homes", berm-fence illustration, and typical sightline are contained in Exhibits G & H of the CUP. The Permittee may adjust building and/or pad heights, building setbacks and berm-fence heights so as to achieve the same screening effect as illustrated in the CUP exhibits. The residential security fence shall not exceed 6 feet in height including 3 feet of slumpstone, 3 feet of wrought iron, and 6 foot pilasters place 50 feet apart. <i>(Compliance with this mitigation measure has been completed and this mitigation measure does not apply to the Valencia Commerce Planning Area. No further action on this measure is required.)</i>
VCC-VR-16: The Permittee shall revegetate the easterly side of the berm on the C-3-DP parcel with native and natural appearing plant species so as to provide an appearance similar to the adjacent natural slope. The revegetation shall include native shrubs planted at the top of the berm so as to screen the residential security fence. The revegetative plantings shall be irrigated until growth is well established, after which irrigation shall be gradually withdrawn. <i>(Compliance with this mitigation measure has been completed and this mitigation measure does not apply to the Valencia Commerce Planning Area. No further action on this measure is required.)</i>
VCC-VR-17: The Permittee shall construct a pedestrian overcrossing over Backer Road, located west of Cambridge Avenue, as required by condition number 38 of the Conditional Use Permit. Fencing of at least eight feet in height shall enclose the overcrossing along each of the overcrossing's sides. In addition, the Permittee shall construct a view-obscuring six-foot high slumpstone wall along the southerly edge of the walkway extending from the overcrossing to the easterly end of the landscape

<p>berm. <i>(Compliance with this mitigation measure has been completed and this mitigation measure does not apply to the Valencia Commerce Planning Area. No further action on this measure is required.)</i></p>
<p>VCC-VR-18: The SCE Easement shall remain as shown on Exhibit B of the Conditional Use Permit, with the exception that (i) the Permittee shall construct a paved access road in accordance with SCE standards, and (ii) SCE may make changes to the easement areas which are beyond the control of the Permittee.</p>
<p>VCC-VR-19: The Permittee shall construct a County Engineer Standard D-65 wall along the westerly top of roadway slope within the Old Road right-of-way from Backer Road southerly a distance of approximately 650 feet. <i>(Compliance with this mitigation measure has been completed and this mitigation measure does not apply to the Valencia Commerce Planning Area. No further action on this measure is required.)</i></p>
<p>VCC-VR-20: The Permittee shall construct, upon the written request of any owner of any of the residential lots adjacent to the Permittee's project, consisting of Lots 49 through 57 of Tract 44460, two additional courses of slumpstone block on the top of the existing rear wall to a total height of six feet. <i>(Compliance with this mitigation measure has been completed and this mitigation measure does not apply to the Valencia Commerce Planning Area. No further action on this measure is required.)</i></p>
<p>AGRICULTURE AND FORESTRY RESOURCES</p>
<p>RMDP/SCP Mitigation Measures</p>
<p>RMDP/SCP-AG-1: In order to minimize the premature conversion of agricultural lands and to track that conversion, prior to issuance of the first grading permit in the Project area where agricultural soils are designated as prime farmland, unique farmland, and/or farmland of statewide importance exist (Pub. Resources Code section 21060.1), the applicant or its designee shall prepare a phasing map to document the phased discontinuation of existing agricultural activities located within the Project area over the course of its development.</p>
<p>RMDP/SCP-AG-2: Newhall Land shall dedicate a permanent agricultural conservation easement for 138 acres of agricultural land located in the Salt Creek conservation area and on adjoining agricultural lands.</p>
<p>CULTURAL RESOURCES—PALEONTOLOGICAL RESOURCES</p>
<p>RMDP/SCP Mitigation Measures</p>
<p>RMDP/SCP-PR-1: A qualified paleontologist shall be retained to monitor and salvage scientifically significant fossil remains. The duration of these inspections depends on the potential for the discovery of fossils, the rate of excavation, and the abundance of fossils.</p> <p>(a) The Saugus and Pico Formations have a high potential to yield paleontological resources and will require continuous monitoring during all grading activities. This may require use of multiple paleontologists working on the site at the same time if simultaneous ground disturbing activities are occurring over an extensive area to assure all areas of excavation are being fully monitored for the presence of paleontological resources. The number of required monitors shall be determined by Project's monitoring paleontologist.</p> <p>(b) The older dissected Pleistocene formations have a moderate potential to yield paleontological resources and will require half-time monitoring during all grading activities by a qualified paleontologist(s).</p> <p>Because of the large size and long duration of this Project, it will be necessary to periodically review the paleontological potential assigned to each rock unit. This shall be done at the end of each phase of grading.</p> <p>This reassessment of potential will be used to develop mitigation plans for future phases of development. If fossil production is lower than expected, the duration of the monitoring efforts should be reduced to less than continuous monitoring during all grading activities.</p>

RMDP/SCP-PR-2: The paleontologist, in consultation with the grading contractor, developer, and Los Angeles County inspector, shall have the power to divert temporarily or direct grading efforts in the area of an exposed fossil to allow evaluation and, if necessary, salvage of exposed fossils.
RMDP/SCP-PR-3: Microinvertebrates are known to exist in the Saugus Formation within the Project area. Samples of the Saugus Formation rock units shall be collected periodically as directed by the Project paleontologist. Appropriate materials for collection are samples of at least 2,000 pounds of rock from likely horizons identified by the Project paleontologist. These samples can be stockpiled (to allow for processing at a later time) to avoid delays in grading activities. The representative rock samples shall be analyzed by a qualified paleontologist for data collection purposes. Based on the results of initial evaluations, the number of collection samples in subsequent grading phases may be increased or decreased as deemed appropriate by the Project paleontologist.
RMDP/SCP-PR-4: Because fossils were discovered during the course of the 1994 field survey, pre-grading salvage is necessary in localities 13, 13A, 14, and 23, as presented in the 1994 Paleontological Technical Report prepared by RMW. This report provides specific details pertaining to the existing conditions as they relate to paleontological resources of the Specific Plan portion of the RMDP and was presented in the Newhall Ranch Specific Plan Program EIR, and is available for public review at the Los Angeles County Department of Regional Planning, 320 W. Temple Street, Los Angeles, California, 90012. These locations represent significant fossil discoveries. A minimum of 2,000 pounds of rock should be collected at each site, stockpiled, and screen washed before grading begins at these locations. The representative rock samples shall be analyzed by a qualified paleontologist for data collection purposes. Based on the results of initial evaluations, the number of collection samples in subsequent grading phases may be increased or decreased as deemed appropriate by the Project paleontologist.
RMDP/SCP-PR-5: Scientific specimens are to become the property of a public, nonprofit educational institution, such as the Los Angeles County Museum of Natural History (or similar institution). Most institutions are now requiring, as conditions for accepting the materials, that significant fossils be prepared, identified to a reasonable level, and catalogued before donation. Therefore, to meet these requirements, prior to the start of Project-related grading, an agreement shall be reached with a suitable scientific repository regarding acceptance of the fossil collection.
RMDP/SCP-PR-6: Locations of recorded fossil deposits shall remain confidential and shall be disclosed to qualified paleontologists or other qualified individuals on a "need to know" basis.
RMDP/SCP-PR-7: To assure compliance with the Los Angeles County guidelines and CEQA, a final report summarizing the results of the mitigation efforts is necessary. To adequately report the results of the mitigation efforts, the report shall include: (1) an itemized inventory of the fossils; (2) pertinent geologic and stratigraphic data; (3) field notes of the collectors; and (4) indication of the repository. Because the Newhall Ranch Specific Plan and the VCC and Entrada planning areas will be developed in phases, a final report shall be prepared at the end of the grading activities associated with each phase of development. This report shall provide the information necessary to reassess the paleontological potential of each rock unit graded and shall include recommendations for future monitoring efforts in those rock units.
VCC Mitigation Measures
VCC-CR-1: If remains, artifacts or cultural resources are discovered all development activity will cease, an assessment will be completed and appropriate mitigations developed prior to continuation of development in that area. <i>(Compliance with this mitigation measure is superseded and fully implemented by RMDP/SCP-CR-5 and RMDP/SCP-CR-6. Because the Valencia Commerce Center Planning Area is required to implement mitigation measures RMDP/SCP-CR-5 and RMDP/SCP-CR-6, no further action on this measure is required.)</i>
VCC-CR-2: Detailed surface field surveys will be conducted with each tentative map approval.

RMDP/SCP Mitigation Measures
<p>RMDP/SCP-CR-5: In the event that cultural resources are encountered during grading anywhere in the Project area, work shall be stopped immediately or redirected until a qualified archaeologist and Native American representative pursuant to the requirements of the Tataviam Agreement are retained by the applicant to evaluate the eligibility of the resources pursuant to CRHR and NRHP criteria. If the remains are found to be significant, they shall be subject to a Phase III data recovery mitigation program consistent with federal Corps, state, and county guidelines and funded by the applicant to the extent allowed by law (see, Pub. Resources Code § 21083.2).</p>
<p>RMDP/SCP-CR-6: If, during any phase of Project construction, there is the discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps, which are based on Public Resources Code section 5097.98 and State CEQA Guidelines section 15064.5(e), shall be taken:</p> <ol style="list-style-type: none"> 1. There will be no further excavation or disturbance of the site or any nearby area reasonably susceptible to overlying adjacent human remains until: <ol style="list-style-type: none"> a. The Los Angeles County Coroner is contacted to determine that no investigation of the cause of death is required; and b. If the Coroner determines the remains to be Native American: <ol style="list-style-type: none"> (i) The Coroner shall contact the Native American Heritage Commission within 24 hours; (ii) The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendant from the deceased Native American; and (iii) The most likely descendent may make recommendations to the Project applicant for means oftreating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code section 5097.98, or, 2. Where the following conditions occur, the Project applicant, or its designee, shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a locationnot subject to further subsurface disturbance: <ol style="list-style-type: none"> a. The Native American Heritage Commission is unable to identify a most likely descendant or the most likely descendant failed to make a recommendation within 24 hours after being notified by the Commission; b. The descendant identified fails to make a recommendation; or c. The Project applicant, or its designee, rejects the recommendation of the descendant, and mediationby the Native American Heritage Commission fails to provide measures acceptable to the Project applicant.
GHG EMISSIONS/ENERGY
RMDP/SCP Mitigation Measures
Building Energy Efficiency
<p>RMDP/SCP-2-1: Prior to the issuance of residential building permits for the project or a portion of the project, the project applicant or its designee shall submit one or more Zero Net Energy Confirmation (ZNE) Reports (ZNE Report) prepared by a qualified building energy efficiency and design consultant to Los Angeles County for review and confirmation that the residential development covered by the ZNE Report achieves the ZNE standard specified in this mitigation measure. Specifically, a ZNE Report shall demonstrate that the residential development within the RMDP/SCP project site subject to application of Title 24, Part 6, of the California Code of Regulations has been designed and shall be constructed to achieve ZNE, as defined by CEC in its 2015 Integrated Energy Policy Report, which requires the value of the net energy produced by project renewable energy resources to equal the value of the energy consumed annually by the project using the CEC's Time Dependent Valuation metric.</p> <p>A ZNE Report shall provide, at a minimum, the following information:</p>

- Confirmation that the residential development shall comply with Title 24, Part 6 building standards that are operative at the time of building permit application.
- Identification of additional measures or building performance standards that shall be relied upon to achieve the ZNE standard (as defined above), assuming ZNE is not already achieved by meeting the operative Title 24, Part 6 building standards.

In demonstrating that the residential development achieves the ZNE standard, the ZNE Report may:

- Evaluate multiple buildings and/or land use types. For example, a ZNE Report may cover all of the residential and non-residential buildings within a neighborhood/community, or a subset thereof, including an individual building.
- Rely upon aggregated or community-based strategies to support its determination that the subject buildings are designed to achieve ZNE. For example, shortfalls in renewable energy generation for one or more buildings may be offset with excess renewable generation from one or more other buildings. As such, a ZNE Report could determine a building is designed to achieve ZNE based on aggregated or community-based strategies even if the building on its own may not be designed to achieve ZNE.
- Make reasonable assumptions about the estimated electricity and natural gas loads and energy efficiencies of the subject buildings.
- If interconnection of the project's renewable generation is not sufficient to allow compliance with the ZNE standard for the project, or a portion of the project, then Los Angeles County shall allow the project applicant or its designee to achieve an equivalent level of GHG emissions reductions to mitigate such shortfall by providing 5.1 metric tonnes carbon dioxide equivalents (MTCO₂e) of GHG reductions for every megawatt-hour of renewable energy generation that would have been needed to achieve the ZNE standard for the project, or a portion of the project, as demonstrated in the ZNE Report.

(This mitigation measure applies to Entrada South without change, with the qualification that the village-specific equivalency metric is 4.3 (not 5.1) MTCO₂e of GHG reductions for every megawatt-hour of renewable energy generation that would have been needed to achieve the ZNE standard. This mitigation measure is not applicable to Valencia Commerce Center because no residential development is proposed.)

RMDP/SCP-2-2: Prior to the issuance of building permits for commercial development and private recreation centers, and prior to the commencement of construction for the public facilities, respectively, for the project or a portion of the project, the project applicant or its designee shall submit one or more Zero Net Energy Confirmation Reports (ZNE Report) prepared by a qualified building energy efficiency and design consultant to Los Angeles County for review and confirmation that the commercial development, private recreation centers, and/or public facilities covered by the ZNE Report achieve the ZNE standard specified in this mitigation measure. Specifically, a ZNE Report shall demonstrate that the commercial development, private recreation centers, and public facilities within the RMDP/SCP project site subject to application of Title 24, Part 6, of the California Code of Regulations have been designed and shall be constructed to achieve ZNE, as defined by CEC in its 2015 Integrated Energy Policy Report, which requires the value of the net energy produced by project renewable energy resources to equal the value of the energy consumed annually by the project using the CEC's Time Dependent Valuation metric.

("Commercial development" includes retail, light industrial, office, hotel, and mixed-use buildings. "Public facilities" are fire stations, libraries, and elementary, middle/junior high and high schools.)

A ZNE Report shall provide, at a minimum, the following information:

- Confirmation that the commercial development, private recreation centers, and/or public facilities shall comply with Title 24, Part 6 building standards that are operative at the time of building permit application.
- Identification of additional measures or building performance standards that shall be relied upon to achieve the ZNE standard (as defined above), assuming ZNE is not already achieved by meeting the operative Title 24, Part 6 building standards.

In demonstrating that the commercial development, private recreation centers, and/or public facilities achieves the ZNE standard, the ZNE Report may:

- Evaluate multiple buildings and/or land use types. For example, a ZNE Report may cover all of the residential and non-residential buildings within a neighborhood/community, or a subset thereof, including an individual building.
- Rely upon aggregated or community-based strategies to support its determination that the subject buildings are designed to achieve ZNE. For example, short falls in renewable energy generation for one or more buildings may be offset with excess renewable generation from one or more other buildings. As such, a ZNE Report could determine a building is designed to achieve ZNE based on aggregated or community-based strategies even if the building on its own may not be designed to achieve ZNE.
- Make reasonable assumptions about the estimated electricity and natural gas loads and energy efficiencies of the subject buildings.
- If interconnection of the project's renewable generation is not sufficient to allow compliance with the ZNE standard for the project, or a portion of the project, then Los Angeles County shall allow the project applicant or its designee to achieve an equivalent level of GHG emissions reductions to mitigate such shortfall by providing 5.1 MTCO₂e of GHG reductions for every megawatt-hour of renewable energy generation that would have been needed to achieve the ZNE standard for the project, or a portion of the project, as demonstrated in the ZNE Report.

(This mitigation measure applies to Entrada South and Valencia Commerce Center without change, with the qualification that the village-specific equivalency metric is 4.3 (not 5.1) MTCO₂e of GHG reductions for every megawatt-hour of renewable energy generation that would have been needed to achieve the ZNE standard.)

RMDP/SCP-2-3: Prior to the issuance of private recreation center building permits, the project applicant or its designee shall submit swimming pool heating design plans to Los Angeles County for review and approval. The design plans shall demonstrate that all swimming pools located at private recreation centers on the RMDP/SCP project site have been designed and shall be constructed to use solar water heating or other technology with an equivalent level of energy efficiency. *(This mitigation measure applies to Entrada South without change. This mitigation measure is not applicable to Valencia Commerce Center because no private recreation center is proposed.)*

Mobile Sources

RMDP/SCP-2-4: Prior to the issuance of residential building permits, the project applicant or its designee shall submit building design plans, to Los Angeles County for review and approval, which demonstrate that each residence within the RMDP/SCP project site subject to application of Title 24, Part 6, of the California Code of Regulations shall be equipped with a minimum of one single-port electric vehicle (EV) charging station. Each charging station shall achieve a similar or better functionality as a Level 2 charging station.

Additionally, prior to the issuance of the first building permit for the RMDP/SCP project site, the project applicant or its designee shall establish and fund a dedicated account for the provision of subsidies for the purchase of zero emission vehicles (ZEVs), as defined by CARB. The project applicant or its designee shall provide proof of the account's establishment and funding to Los Angeles County.

<p>The dedicated account shall be incrementally funded, for each village-level project, in an amount that equals the provision of a \$1,000 subsidy per residence – on a first-come, first-served basis – for 65 percent of the village’s total residences subject to application of Title 24, Part 6, of the California Code of Regulations. <i>(This mitigation measure applies to Entrada South without change. This mitigation measure is not applicable to Valencia Commerce Center because no residential development is proposed.)</i></p>
<p>RMDP/SCP-2-5: Prior to the issuance of commercial building permits, the project applicant or its designee shall submit building design plans, to Los Angeles County, which demonstrate that the parking areas for commercial buildings on the RMDP/SCP project site shall be equipped with electric vehicle (EV) charging stations that provide charging opportunities to 7.5 percent of the total number of required parking spaces. (“Commercial buildings” include retail, light industrial, office, hotel, and mixed-use buildings.)</p> <p>The EV charging stations shall achieve a similar or better functionality as a Level 2 charging station. In the event that the installed charging stations use functionality/technology other than Level 2 charging stations, the parameters of the mitigation obligation (i.e., number of parking spaces served by EV charging stations) shall reflect the comparative equivalency of Level 2 charging stations to the installed charging stations on the basis of average charge rate per hour. For purposes of this equivalency demonstration, Level 2 charging stations shall be assumed to provide charging capabilities of 25 range miles per hour. <i>(This mitigation measure applies to Entrada South and Valencia Commerce Center without change.)</i></p>
<p>RMDP/SCP-2-6: The project applicant-submitted Newhall Ranch Transportation Demand Management (TDM) Plan, located in Final AEA Appendix 7, shall be implemented to reduce vehicle miles traveled (VMT) resulting from project build out with oversight from Los Angeles County. The TDM Plan is designed to influence the transportation choices of residents, students, employees, and visitors, and serves to enhance the use of alternative transportation modes both on and off the project site through the provision of incentives and subsidies, expanded transit opportunities, bikeshare and carshare programs, technology-based programs, and other innovative means. Village-level implementation of relevant elements of the TDM Plan shall proceed in accordance with village-level applicability supplements prepared by a qualified transportation engineer that are reviewed and considered by Los Angeles County when approving tentative subdivision maps for land developments that are part of the project.</p> <p>Accordingly, the TDM Plan identifies key implementation actions that are critical to the effectiveness of the VMT-reducing strategies, as well as timeline and phasing requirements, monitoring standards, and performance metrics and targets tailored to each of the strategies.</p> <p>In accordance with the TDM Plan, a non-profit Transportation Management Organization (TMO) or equivalent management entity shall be established to provide the services required, as applicable. <i>(This mitigation measure applies to Entrada South and Valencia Commerce Center without change.)</i></p>
<p>RMDP/SCP-2-7: Prior to the issuance of traffic signal permits, the project applicant or its designee shall work with Los Angeles County and the California Department of Transportation (Caltrans), as applicable, to facilitate traffic signal coordination along:</p> <ol style="list-style-type: none"> 1. State Route 126 from the Los Angeles County line to the Interstate 5 north-bound ramps; 2. Chiquito Canyon Road, Long Canyon Road, and Valencia Boulevard within the RMDP/SCP Project site; 3. Magic Mountain Parkway from Long Canyon Road to the Interstate 5 north-bound ramps; and, 4. Commerce Center Drive from Franklin Parkway to Magic Mountain Parkway. <p>To effectuate the signal synchronization and specifically the operational and timing adjustments needed at affected traffic signals, the project applicant or its designee shall submit traffic signal plans for review and approval, and/or pay needed fees as determined by Los Angeles County or Caltrans, as applicable.</p>

<p>A majority of the signals that will be synchronized will be new signals constructed/installed by the project. Thus, for these signals, the project will provide the necessary equipment at the signal controller cabinet, as well as within the new roadways themselves, to enable and facilitate synchronization. The project is responsible for paying 100 percent of the applicable fee amount for the signal synchronization work, with assurance that the necessary funding will be available to fully implement this measure. <i>(This mitigation measure applies to the traffic signals within each project area of Entrada South and Valencia Commerce Center without change.)</i></p>
<p>RMDP/SCP-2-8: Consistent with the parameters of the Newhall Ranch TDM Plan, the project applicant or its designee shall provide Los Angeles County with proof that funding has been provided for the purchase, operation and maintenance of zero emission school buses in furtherance of the school bus program identified in the project's TDM Plan. The proof of funding shall be demonstrated incrementally as the school bus program is paced to village-level occupancy and student enrollment levels. <i>(This mitigation measure applies to Entrada South without change. This mitigation measure is not applicable to Valencia Commerce Center because no residential development is proposed.)</i></p>
<p>RMDP/SCP-2-9: Prior to the issuance of the first 2,000th residential building permit within the RMDP/SCP project site and every 2,000th residential building permit thereafter, the project applicant or its designee shall provide Los Angeles County with proof that it has provided a subsidy of \$100,000 per bus for the replacement of up to 10 diesel or compressed natural gas transit buses with zero emission buses to the identified transit provider(s). <i>(The Entrada South Project shall be responsible for its proportional share of the referenced subsidies. This mitigation measure is not applicable to Valencia Commerce Center because no residential development is proposed.)</i></p>
<p>RMDP/SCP-2-10: Prior to issuing grading permits for village-level development within the RMDP/SCP projectsite, Los Angeles County shall confirm that the project applicant or its designee shall fully mitigate the related construction and vegetation change GHG emissions associated with each such grading permit (the "Incremental Construction GHG Emissions") by relying upon one of the following compliance options, or a combination thereof, in accordance with the project applicant-submitted Newhall Ranch GHG Reduction Plan (GHG Reduction Plan; see Final AEA Appendix 6):</p> <p>Directly undertake or fund activities that reduce or sequester GHG emissions ("Direct Reduction Activities") and retire the associated "GHG Mitigation Credits" in a quantity equal to the Incremental Construction GHG Emissions. A "GHG Mitigation Credit" shall mean an instrument issued by an Approved Registry that satisfies the performance standards set forth in the GHG Reduction Plan and shall represent the estimated reduction or sequestration of one metric tonne of carbon dioxide equivalent that will be achieved by a Direct Reduction Activity that is not otherwise required (CEQA Guidelines Section 15126.4(c)(3)). An "Approved Registry" is an accredited carbon registry as defined by the GHG Reduction Plan; or</p> <p>Obtain and retire "Carbon Offsets" in a quantity equal to the Incremental Construction GHG Emissions. "Carbon Offset" shall mean an instrument issued by an Approved Registry that satisfies the performance standards set forth in the GHG Reduction Plan and shall represent the past reduction or sequestration of one metric tonne of carbon dioxide equivalent achieved by a Direct Reduction Activity or any other GHG emission reduction project or activity that is not otherwise required (CEQA Guidelines Section 15126.4(c)(3)). <i>(This mitigation measure applies to Entrada South and Valencia Commerce Center without change.)</i></p>
<p>Local/Off-site Mitigation</p>
<p>RMDP/SCP-2-11: Prior to the issuance of building permits for development within the RMDP/SCP project site, the project applicant or its designee shall undertake or fund Direct Reduction Activities pursuant to the Building Retrofit Program ("Retrofit Program"), as included in Final AEA Appendix 13 to improve the energy efficiency of existing buildings located primarily in disadvantaged communities (as defined in the Retrofit Program). The project applicant or its designee shall retire GHG Mitigation Credits or Carbon Offsets issued by an Approved Registry based on such Direct Reduction Activities in a quantity equal to the sum of the following (together, the "Retrofit Reduction Requirement") as included in Final AEA Appendix 13:</p>

- For the residential portion of a building permit application, the product of the planned number of residential units for the village-level project multiplied by 0.0377 MTCO_{2e};
- For the commercial portion of a building permit application, the product of the planned commercial development per thousand commercial square feet multiplied by 0.0215 MTCO_{2e}. ("Commercial development" includes retail, light industrial, office, hotel and mixed-use buildings.)

Building retrofits covered by the Retrofit Program can include, but are not limited to: cool roofs, solar panels, solar water heaters, smart meters, energy efficient lighting (including, but not limited to, light bulb replacement), energy efficient appliances, energy efficient windows, pool covers, insulation, and water conservation measures.

The Retrofit Program shall be implemented within the geographic area defined to include Los Angeles County and primarily within disadvantaged communities, as defined by the Retrofit Program, or in other areas accepted by the Los Angeles County Planning Director.

(This mitigation measure applies to Entrada South without change. This mitigation measure applies to Valencia Commerce Center without change, other than that the residential portion of this mitigation measure does not apply to the Valencia Commerce Center because no residential development is proposed.)

RMDP/SCP-2-12: Prior to the issuance of the first building permit for the RMDP/SCP project site, the project applicant or its designee shall provide Los Angeles County with proof of installation of EV charging stations capable of serving 20 off-site parking spaces. Thereafter, the project applicant or its designee shall provide Los Angeles County proof of installation of EV charging stations prior to the issuance of residential and commercial building permits per the following ratios: one (1) off-site parking space shall be served by an electric vehicle charging station for every 30 dwelling units, and one (1) off-site parking space shall be served by an electric vehicle charging station for every 7,000 square feet of commercial development. ("Commercial development" includes retail, light industrial, office, hotel and mixed-use buildings.) Off-site EV charging stations capable of servicing 2,036 parking spaces would be required if the maximum allowable development facilitated by the RMDP/SCP project occurs; fewer EV charging stations would be required if maximum build-out under the RMDP/SCP project does not occur.

The EV charging stations shall achieve a similar or better functionality as a Level 2 charging station and may service one or more parking spaces. In the event that the installed charging stations use functionality/technology other than Level 2 charging stations, the parameters of the mitigation obligation (i.e., number of parking spaces served by EV charging stations) shall reflect the comparative equivalency of Level 2 charging stations to the installed charging stations on the basis of average charge rate per hour. For purposes of this equivalency demonstration, Level 2 charging stations shall be assumed to provide charging capabilities of 25 range miles per hour.

The EV charging stations shall be located within the geographic area defined to include Los Angeles County. The EV charging stations shall be in areas that are generally accessible to the public, such as areas that include, but are not limited to, retail centers, employment centers and office complexes, recreational facilities, schools, and other categories of public facilities. *(This mitigation measure applies to Entrada South without change. This mitigation measure applies to Valencia Commerce Center without change, other than that the residential portion of this mitigation measure does not apply to the Valencia Commerce Center because no residential development is proposed.)*

RMDP/SCP-2-13: In addition to Mitigation Measures 2-1 through 2-12, the project applicant or its designee shall offset GHG emissions to zero by funding or undertaking Direct Reduction Activities or, if necessary, obtaining Carbon Offsets through the Newhall Ranch GHG Reduction Plan. The project applicant-submitted Newhall Ranch GHG Reduction Plan focuses on achieving GHG reductions or sequestration through the Direct Reduction Activities in coordination with an Approved Registry, such

as the Climate Action Reserve. If these Direct Reduction Activities do not achieve the necessary amount of GHG reductions, the project applicant or its designee can obtain Carbon Offsets issued by an Approved Registry.

Prior to issuing building permits for development within the RMDP/SCP project site, Los Angeles County shall confirm that the project applicant or its designee shall fully offset the project's remaining (i.e., post implementation of Mitigation Measures 2-1 through 2-12) operational GHG emissions over the 30-year project life associated with each such building permit (the "Incremental Operational GHG Emissions") by relying upon one of the following compliance options, or a combination thereof, in accordance with the Newhall Ranch GHG Reduction Plan:

- Undertake or fund Direct Reduction Activities that are estimated to result in GHG Mitigation Credits, as described in the GHG Reduction Plan, and retire such GHG Mitigation Credits in a quantity equal to the Incremental Operational GHG Emissions;
- Undertake or fund Direct Reduction Activities and retire the associated Carbon Offsets in a quantity equal to the Incremental Operational GHG Emissions; or
- If necessary, as determined by the Los Angeles County Planning Director in accordance with the GHG Reduction Plan, to fully offset Incremental Operational GHG Emissions, the project applicant or its designee may purchase and retire Carbon Offsets that have been issued by an Approved Registry in a quantity equal to the Incremental Operational GHG Emissions.

Compliance with MM 2-13 shall be demonstrated incrementally prior to obtaining building permits.

The Incremental Operational GHG Emissions shall be equal to the sum of (1) the number of proposed residential units covered by the applicable building permit multiplied by a "GHG Residential Ratio" and (2) every thousand square feet of proposed commercial development covered by the applicable building permit multiplied by a "GHG Commercial Ratio." ("Commercial development" includes retail, light industrial, office, hotel, and mixed-use buildings.) GHG Residential Ratio and GHG Commercial Ratio shall mean the emissions ratios in MTCO₂e set forth in the applicable CEQA analysis completed by the County of Los Angeles for a specific village-level project to ensure that the related GHG emissions are reduced to zero. *(This mitigation measure applies to Entrada South without change. This mitigation measure applies to Valencia Commerce Center without change, other than that the residential portion of this mitigation measure does not apply to the Valencia Commerce Center because no residential development is proposed.)*

Project Applicant–Proposed Supplemental Commitment

In addition to the installation of EV charging stations required by Mitigation Measures 2-5 and 2-12, and although not required for the project to achieve net zero GHG emissions, the project applicant or its designee shall provide Los Angeles County with proof of installation of EV charging stations prior to the issuance of residential and commercial building permits per the following ratios: one (1) parking space shall be served by an electric vehicle charging station for every 50 dwelling units, and one (1) parking space shall be served by an electric vehicle charging station for every 15,900 square feet of commercial development. ("Commercial development" includes retail, light industrial, office, hotel and mixed-use buildings.) EV charging stations capable of servicing 1,010 parking spaces would be required if the maximum allowable development facilitated by the RMDP/SCP project occurs; fewer EV charging stations would be required if maximum build-out under the RMDP/SCP project does not occur.

The EV charging stations shall achieve a similar or better functionality as a Level 2 charging station and may service one or more parking spaces. In the event that the installed charging stations use functionality/technology other than Level 2 charging stations, the parameters of the mitigation obligation (i.e., number of parking spaces served by EV charging stations) shall reflect the comparative equivalency of Level 2 charging stations to the installed charging stations on the basis of average charge rate per hour.

<p>For purposes of this equivalency demonstration, Level 2 charging stations shall be assumed to provide charging capabilities of 25 range miles per hour.</p> <p>The EV charging stations shall be located either on the project site or within the jurisdictional area of the Southern California Association of Governments. The EV charging stations shall be in areas that are generally accessible to the public, such as areas that include, but are not limited to, retail centers, employment centers and office complexes, recreational facilities, schools, and other categories of public facilities. <i>(This supplemental commitment applies to Entrada South without change. This mitigation measure applies to Valencia Commerce Center without change, other than that the residential portion of this mitigation measure does not apply to the Valencia Commerce Center because no residential development is proposed.)</i></p>
GEOLOGY AND SOILS
ES/VCC Mitigation Measures
<p>ES/VCC-GEO-1: Prior to the issuance of building permits, all structures shall be designed using sound engineering judgment and the latest California Building Code (CBC) requirements, as a minimum, which prescribe minimum lateral forces, applied statically to each habitable structure, combined with the gravity forces of dead and live loads.</p>
<p>ES/VCC-GEO-2: Prior to the issuance of rough grading permits, in those portions of the Entrada and VCC planning areas where the anticipated seismic differential settlement exceeds the County of Los Angeles' one-inch seismic differential settlement standard, alluvium removal will be required based on the recommendations of a registered geotechnical engineer, pursuant to the County of Los Angeles Manual for Preparation of Geotechnical Reports.</p>
<p>ES/VCC-GEO-3: Prior to the issuance of rough grading permit, in order to address landslides, unstable soils, liquefaction, expansive soils and dry-sand settlement, a Corrective Grading Plan delineating the areas where such geotechnical conditions exist shall be prepared by a registered geotechnical engineer and submitted to the Department of Public Works pursuant to the County of Los Angeles Manual for Preparation of Geotechnical Reports. The Corrective Grading Plan shall address the following:</p> <ul style="list-style-type: none"> a. Project grading shall include a combination of ground modification and/or structural mitigation in areas subject to liquefaction to reduce the risk to an acceptable level (as defined by CGS in Special Publication 117a, Chapter 2, or as superseded by CGS guidance in effect at the time of implementation of this measure). Ground modification shall consist of the removal of some of the soil material subject to liquefaction and/or elevating the site grades over the material subject to liquefaction. The recommended depth of removal for mitigation of liquefaction ranges from 5 to 30 feet. Structures shall be designed to resist the anticipated static and seismic total and differential settlements. b. Landslides shall be stabilized and/or removed, and/or building setbacks shall be used to protect structural integrity. c. Grading and engineering design requirements shall address the removal of unstable soils, stabilization of potential landslide areas, and compaction of engineered fill to meet County of Los Angeles soil compaction requirements (County of Los Angeles Grading Guidelines, 2008). d. Areas where expansive soils are encountered shall include grading measures designed to locate expansive soils and implement recommendations to reduce hazard of construction in expansive soils including but not limited to removing expansive soil and replacing with engineered fill, installing drainage systems, using stiffened foundations systems, or conducting engineered preparation of building pads.
<p>ES/VCC-GEO-4: Prior to the issuance of building permits, soil corrosion testing shall be completed, and appropriate mitigation shall be implemented in accordance with the latest California Building Code (CBC) as a minimum, to reduce hazard of construction in corrosive soils.</p>
VCC Mitigation Measures

VCC-GEO-1: A minimum 60 to 80 foot setback over the Holser Fault is part of the project design. Potential impacts from ground shaking will be mitigated by compliance with Section 2312(d) of the Los Angeles County Building Code. <i>(Building setbacks are no longer required within the VCC Planning Area based upon additional, subsequent geotechnical investigation reports. Building design will continue to comply with the Los Angeles County Building Code and regulatory standards for purposes of mitigating ground shaking, as required by Mitigation Measure ES/VCC-GEO-1. No further action is required.)</i>
VCC-GEO-2: All cut slopes will be designed at 2:1 gradients. If cut slopes are steeper than the bedding, then buttresses, retaining walls and/or stability equivalents will be provided. <i>(This mitigation measure is superseded by regulatory compliance, specifically compliance with the County's Grading Code and adopted Grading Guidelines (January 1, 2008). No further action is required.)</i>
VCC-GEO-3: Landslides will be stabilized with shear keys and/or removal and compaction. <i>(This mitigation measure is superseded by Mitigation Measure ES/VCC-GEO-3. No further action is required.)</i>
VCC-GEO-4: Expansive bedrock will be removed and replaced with certified fill or special foundations will be designed. Fills will be designed at 2:1 gradients. <i>(This mitigation measure is superseded by Mitigation Measure ES/VCC-GEO-3. No further action is required.)</i>
VCC-GEO-5: All major canyon fills, buttresses, stability fills, shear keys, and retaining walls will require subdrains. <i>(This mitigation measure is superseded by regulatory compliance, specifically compliance with the County's Grading Code and adopted Grading Guidelines (January 1, 2008). No further action is required.)</i>
PUBLIC SERVICES—SHERIFF PROTECTION
Project Design Features
PDF-PS-1: Any gated entrances to the Project Site subareas shall incorporate a Knox-Box entry system or equivalent.
PDF-PS-2: The Project Applicant, its successors or designees shall notify the Los Angeles County Sheriff's Department and California Highway Patrol prior to any Project-related lane closures or other road construction and ensure emergency access remains clear and unobstructed.
PDF-PS-3: During construction, construction signs shall be posted with a reduced construction zone speed limit per guidance from the California Highway Patrol.
PDF-PS-4: Upon completion, the Applicant shall provide the Santa Clarita Valley Sheriff Station Commander with a diagram of each portion of the Project Site, including building entries and access routes.
PDF-PS-5: Prior to commencement of construction, the Project Applicant shall retain the services of a private security company to patrol the construction sites, as necessary, to minimize the potential for trespass, theft, and other unlawful activity.
RMDP/SCP Mitigation Measures
RMDP/SCP-PS-1: Prior to the issuance of building permits for commercial, office, and industrial development, and for single-family and multi-family residential development where a Capital Improvement/Construction Plan has been adopted, the applicant or designee shall pay the Los Angeles County Law Enforcement Facilities Mitigation Fee for north Los Angeles County. <i>(The Law Enforcement Facilities Mitigation Fee is also known as the Law Enforcement Facilities Fee; see County Code Chapter 22.74. This measure would be achieved through regulatory compliance; no further action is required.)</i>
VCC Mitigation Measures
VCC-PS-1: Project related tax base expansion will help to mitigate project related impacts. <i>(This measure has been superseded by the project design features and mitigation measures set forth herein and thus is no longer applicable. No further action is required.)</i>
VCC-PS-2: Safety standards and guidelines will be incorporated into the project. <i>(This measure has been superseded by the project design features and mitigation measures set forth herein and thus is no longer applicable. No further action is required.)</i>

VCC-PS-3: Roadway improvements would help alleviate congestion and improve response time. <i>(This measure has been superseded by the project design features and mitigation measures set forth herein and thus is no longer applicable. No further action is required.)</i>
VCC-PS-4: Many businesses will utilize on-site security services. <i>(This measure has been superseded by the project design features and mitigation measures set forth herein and thus is no longer applicable. No further action is required.)</i>
PUBLIC SERVICES—SCHOOLS
Project Design Features
PDF-PS-6: The developer of future subdivisions which allow construction shall comply with the terms and conditions of the School Facilities Funding Agreement between The Newhall Land and Farming Company and the Newhall School District. <i>(This PDF applies to Entrada South Planning Area without change. This PDF does not apply to the Valencia Commerce Center Planning Area as it is not within the Newhall School District.)</i>
PDF-PS-7: The developer of future subdivisions which allow construction shall comply with the terms and conditions of the School Facilities Funding Agreement between The Newhall Land and Farming Company and the William S. Hart Union High School District.
PDF-PS-8: The developer of future subdivisions which allow construction shall comply with the terms and conditions of the School Facilities Funding Agreement between The Newhall Land & Farming Company and the Castaic Union School District. <i>(This PDF applies to the Valencia Commerce Center Planning Area without change. This PDF does not apply to the Entrada South Planning Area as it is not within the Castaic Union School District.)</i>
PDF-PS-9: The developer of future subdivisions which allow construction shall comply with the terms and conditions of the School Facilities Funding Agreement between The Newhall Land & Farming Company and the Saugus Union School District. <i>(This PDF applies to Entrada South Planning Area without change. This PDF does not apply to the Valencia Commerce Center Planning Area as it is not within the Saugus Union School District.)</i>

Appendix IS-2

GHG and Energy Memorandum



Prepared for
The Newhall Land and Farming Company
Valencia, California

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Irvine, California

Project Number
1690010685-004

Date
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ENTRADA SOUTH AND VALENCIA COMMERCE CENTER PROJECT GREENHOUSE GAS AND ENERGY IMPACTS

NEWHALL RANCH

LOS ANGELES COUNTY, CALIFORNIA

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APPENDICES

Appendix A:	CalEEMod® Output Files
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ACRONYMS AND ABBREVIATIONS

Acronym	Definition
AB	Assembly Bill
AEA	Additional Environmental Analysis
BTU	British thermal unit
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CO ₂ e	carbon dioxide equivalents
CO ₂ e/DU	carbon dioxide equivalents/dwelling unit
CO ₂ e/yr	carbon dioxide equivalents/year
DU	dwelling unit
EIR	Environmental Impact Report
ES	Entrada South
EPA	Environmental Protection Agency
EV	Electric vehicle
FAR	floor area ratio
GHG	greenhouse gas
MM	mitigation measures
MMBTU	Million British thermal unit
MMRP	Mitigation Monitoring and Reporting Program
MT	metric tonne
MT/yr	metric tonne/year
MWh	megawatt-hour
N/A	Not applicable
OV OV	One Valley One Vision
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SF	square foot
STU	students
TDM	Transportation Demand Management
TGAL	thousand gallons
TMO	Transportation Management Organization
TSF	thousand square feet
USEPA	United States Environmental Protection Agency
VCC	Valencia Commerce Center
VMT	vehicle miles traveled
ZEVs	zero emission vehicles
ZNE	Zero Net Energy

1. INTRODUCTION

This analysis has been prepared to evaluate any potentially significant greenhouse gas (GHG) and energy impacts due to modifications of the above-referenced Project (hereinafter referred to as the Modified Project). For reference, this analysis refers to the approved Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan (RMDP/SCP; hereinafter referred to as the 2017 Approved Project) studied in the State-certified Environmental Impact Report (EIR; State Clearinghouse [SCH] No. 2000011025). As described below, the Modified Project will not result in new significant impacts after mitigation.

2. BACKGROUND

Section 2, Global Climate Change/Greenhouse Gas Emissions, of the State-certified EIR's Additional Environmental Analysis provided a comprehensive analysis of the 2017 Approved Project's GHG emissions. The State-certified EIR process culminated with the California Department of Fish and Wildlife's (CDFW) adoption of a comprehensive mitigation framework for the attainment of net zero GHG emissions. The mitigation framework includes Mitigation Measures 2-1 through 2-13, as well as a Project Applicant-Proposed Supplemental Commitment that was incorporated into the adopted Mitigation Monitoring and Reporting Program (MMRP). Mitigation Measures 2-1 through 2-13 require the following overall GHG reduction strategies: zero net energy development; zero emission transportation; transportation demand management; reduction of construction and vegetation change emissions; and operational carbon neutrality.

In CDFW's findings for the State-certified EIR, CDFW concluded that, based on the State-certified EIR's GHG analysis and all supporting documentation, including estimates of emissions, the 2017 Approved Project would feasibly and reliably achieve net zero GHG emissions with the implementation of the 13 mitigation measures (2017 Final Additional Environmental Analysis [AEA], Tables 2.3-4 and 2.3-5). Accordingly, CDFW found that the 2017 Approved Project, with mitigation, will not create any net GHG emissions and, in all events, would not create cumulatively considerable GHG emissions. With the applicant's commitment to the detailed GHG reduction measures and its commitment to net zero emissions, and with technical and other support from the California Air Resources Board (CARB), CDFW found – in its independent lead agency judgment – that the 2017 Approved Project's GHG impacts would be less than significant with mitigation.

In addition, because the 2017 Approved Project would result in no net increase of GHG emissions, it would not conflict with any plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The State, and by extension regional and local climate policy, is rooted in achieving an emissions level below the reference year of 1990 and is based on levels established by scientific evidence to avoid adverse impacts of climate change. Therefore, relevant plans, such as CARB's Scoping Plan, the Southern California Association of Government's Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), and Los Angeles County's Community Climate Action Plan, all establish non-zero targets (i.e., some level of positive net emissions above existing conditions for land developments to accommodate planned growth) to achieve future GHG emissions targets. By achieving net zero GHG emissions, the feasibility and reliability of which has been demonstrated in the State-certified EIR, the 2017 Approved Project would not conflict with any relevant plan, policy, or regulation adopted for the purpose of reducing GHG emissions. CDFW determined that impacts related to conflicts with relevant plans, policies or regulations would be less than significant.

Further, CDFW determined that a 30-year project life is the appropriate period to use to evaluate the 2017 Approved Project's GHG emissions inventory and the applicant's commitment to net zero emissions. The 30-year project life represents the current reasonable limit of scientific and evidentiary data for the 2017 Approved Project, given current modeling tools, the changing regulatory structure, the level of uncertainty

beyond 2050 with respect to regulatory programs mandating further reductions in GHG emissions, and other available information.

In preparing the State-certified EIR's GHG analysis, CDFW had ongoing discussions and consultation with its consultant and technical staff at CARB concerning the adequacy and completeness of the technical GHG analysis and mitigation provided in both the Draft AEA and Final AEA, technical appendices and responses to comments. CARB is the expert State agency charged with implementing the State's climate policies. As memorialized in a letter from the CARB to CDFW, dated November 3, 2016, CARB concluded that the Draft AEA "provides an adequate technical basis to determine that the project would not result in any net additional GHG emissions after the mitigation measures are fully implemented." CARB reiterated the same view in a letter to CDFW dated June 7, 2017, concluding that the State-certified EIR's GHG analyses provide an adequate "technical basis for CDFW to find, in its lead agency discretion ... , that the project as currently proposed will not result in any net additional greenhouse gas emissions after identified mitigation measures are fully implemented."

CDFW identified a number of GHG benefits (with corresponding energy co-benefits) associated with the 2017 Approved Project when certifying the State-certified EIR:

- The 2017 Approved Project represents an innovative demonstration of a mixed-use development project providing needed housing and commercial development in a manner consistent with California's GHG reduction goals. Once developed, the 2017 Approved Project will be one of the largest, if not the largest, developments ever in California to achieve net zero GHG emissions. Benefits achieved from the 2017 Approved Project are exemplified by, but are not necessarily limited to, the following:
 - With implementation of Mitigation Measures 2-1 through 2-13, the 2017 Approved Project will reduce all project-related construction and operational GHG emissions to net zero over the 30-year project life.
 - As highlighted in CARB's 2017 Climate Change Scoping Plan, the 2017 Approved Project serves as one of "[s]everal recent examples of sustainable land use development projects in California [that] have demonstrated that it is feasible to design projects that achieve zero net additional GHG emissions."
 - The 2017 Approved Project will design and construct residential development, commercial development, private recreation centers, and public facilities to achieve Zero Net Energy standards, as defined by the California Energy Commission, which advances California policy goals of increasing the energy efficiency of homes and commercial buildings.
 - The 2017 Approved Project will install an electric vehicle charging station at every residence, as well as thousands more electric vehicle charging stations in commercial areas within the project site and off-site throughout Los Angeles County. The 2017 Approved Project will also provide subsidies for the purchase of zero emission vehicles to Project residents. This suite of mitigation commitments is expected to make the 2017 Approved Project a model community for electric vehicle ownership and increase the electric vehicle adoption rate within the Santa Clarita area and Los Angeles County, advancing

State, regional and local goals to reduce emissions through an increased use of electric vehicles.

- The 2017 Approved Project will implement a comprehensive Transportation Demand Management Plan to reduce vehicle miles travelled and enhance the use of alternative transportation modes both on and off the 2017 Approved Project site, advancing State, regional and local policy goals.
- The 2017 Approved Project will offer subsidies to transit providers for the replacement of up to 10 diesel or compressed natural gas transit buses with zero emission buses.
- The 2017 Approved Project will undertake or fund a building retrofit program to improve the energy efficiency of homes and other buildings within disadvantaged communities in Los Angeles County.
- The 2017 Approved Project will achieve GHG reductions by implementing direct reduction activities in accordance with the project's GHG Reduction Plan.

2.1 GHG Mitigation Measures from the State-Certified EIR

The 13 mitigation measures set forth below are identical to those imposed on the 2017 Approved Project in accordance with the State-certified EIR.¹ Parentheticals provide village-specific implementation details for Entrada South and Valencia Commerce Center.

Building Energy Efficiency

- **2-1.** Prior to the issuance of residential building permits for the project or a portion of the project, the project applicant or its designee shall submit one or more Zero Net Energy Confirmation (ZNE) Reports (ZNE Report) prepared by a qualified building energy efficiency and design consultant to Los Angeles County for review and confirmation that the residential development covered by the ZNE Report achieves the ZNE standard specified in this mitigation measure. Specifically, a ZNE Report shall demonstrate that the residential development within the RMDP/SCP project site subject to application of Title 24, Part 6, of the California Code of Regulations has been designed and shall be constructed to achieve ZNE, as defined by CEC in its 2015 Integrated Energy Policy Report, which requires the value of the net energy produced by project renewable energy resources to equal the value of the energy consumed annually by the project using the CEC's Time Dependent Valuation metric.

A ZNE Report shall provide, at a minimum, the following information:

- Confirmation that the residential development shall comply with Title 24, Part 6 building standards that are operative at the time of building permit application.
- Identification of additional measures or building performance standards that shall be relied upon to achieve the ZNE standard (as defined above), assuming ZNE is not already achieved by meeting the operative Title 24, Part 6 building standards.

¹ The RMDP/SCP Project's geographic boundaries encompass three planning areas: the Newhall Ranch Specific Plan, Valencia Commerce Center, and Entrada.

In demonstrating that the residential development achieves the ZNE standard, the ZNE Report may:

- Evaluate multiple buildings and/or land use types. For example, a ZNE Report may cover all of the residential and non-residential buildings within a neighborhood/community, or a subset thereof, including an individual building.
- Rely upon aggregated or community-based strategies to support its determination that the subject buildings are designed to achieve ZNE. For example, shortfalls in renewable energy generation for one or more buildings may be offset with excess renewable generation from one or more other buildings. As such, a ZNE Report could determine a building is designed to achieve ZNE based on aggregated or community-based strategies even if the building on its own may not be designed to achieve ZNE.
- Make reasonable assumptions about the estimated electricity and natural gas loads and energy efficiencies of the subject buildings.
- If interconnection of the project's renewable generation is not sufficient to allow compliance with the ZNE standard for the project, or a portion of the project, then Los Angeles County shall allow the project applicant or its designee to achieve an equivalent level of GHG emissions reductions to mitigate such shortfall by providing 5.1 metric tonnes carbon dioxide equivalents (MTCO_{2e}) of GHG reductions for every megawatt-hour of renewable energy generation that would have been needed to achieve the ZNE standard for the project, or a portion of the project, as demonstrated in the ZNE Report.

*(This mitigation measure applies to Entrada South without change, with the qualification that the village-specific equivalency metric is 4.3 (not 5.1) MTCO_{2e} of GHG reductions for every megawatt-hour of renewable energy generation that would have been needed to achieve the ZNE standard. This mitigation measure is not applicable to Valencia Commerce Center because no residential development is proposed.)*²

- **2-2.** Prior to the issuance of building permits for commercial development and private recreation centers, and prior to the commencement of construction for the public facilities, respectively, for the project or a portion of the project, the project applicant or its designee shall submit one or more Zero Net Energy Confirmation Reports (ZNE Report) prepared by a qualified building energy efficiency and design consultant to Los Angeles County for review and confirmation that the commercial development, private recreation centers, and/or public facilities covered by the ZNE Report achieve the ZNE standard specified in this mitigation measure. Specifically, a ZNE Report shall demonstrate that the commercial development, private recreation centers, and public facilities within the RMDP/SCP project site subject to application of Title 24, Part 6, of the California Code of Regulations have been designed and shall be constructed to achieve ZNE, as defined by CEC in its 2015 Integrated Energy Policy Report, which requires the value of the net energy produced by project renewable energy resources to equal the value of the energy consumed annually by the project using the CEC's Time Dependent Valuation metric.

² This village-specific equivalency metric can be found in Appendix A.

("Commercial development" includes retail, light industrial, office, hotel, and mixed-use buildings. "Public facilities" are fire stations, libraries, and elementary, middle/junior high and high schools.)

A ZNE Report shall provide, at a minimum, the following information:

- Confirmation that the commercial development, private recreation centers, and/or public facilities shall comply with Title 24, Part 6 building standards that are operative at the time of building permit application.
- Identification of additional measures or building performance standards that shall be relied upon to achieve the ZNE standard (as defined above), assuming ZNE is not already achieved by meeting the operative Title 24, Part 6 building standards.

In demonstrating that the commercial development, private recreation centers, and/or public facilities achieves the ZNE standard, the ZNE Report may:

- Evaluate multiple buildings and/or land use types. For example, a ZNE Report may cover all of the residential and non-residential buildings within a neighborhood/community, or a subset thereof, including an individual building.
- Rely upon aggregated or community-based strategies to support its determination that the subject buildings are designed to achieve ZNE. For example, short falls in renewable energy generation for one or more buildings may be offset with excess renewable generation from one or more other buildings. As such, a ZNE Report could determine a building is designed to achieve ZNE based on aggregated or community-based strategies even if the building on its own may not be designed to achieve ZNE.
- Make reasonable assumptions about the estimated electricity and natural gas loads and energy efficiencies of the subject buildings.
- If interconnection of the project's renewable generation is not sufficient to allow compliance with the ZNE standard for the project, or a portion of the project, then Los Angeles County shall allow the project applicant or its designee to achieve an equivalent level of GHG emissions reductions to mitigate such shortfall by providing 5.1 MTCO₂e of GHG reductions for every megawatt-hour of renewable energy generation that would have been needed to achieve the ZNE standard for the project, or a portion of the project, as demonstrated in the ZNE Report.

(This mitigation measure applies to Entrada South and Valencia Commerce Center without change, with the qualification that the village-specific equivalency metric is 4.3 (not 5.1) MTCO₂e of GHG reductions for every megawatt-hour of renewable energy generation that would have been needed to achieve the ZNE standard.)

- **2-3.** Prior to the issuance of private recreation center building permits, the project applicant or its designee shall submit swimming pool heating design plans to Los Angeles County for review and approval. The design plans shall demonstrate that all swimming pools located at private recreation centers on the RMDP/SCP project site have been designed and shall be constructed to use solar water heating or other technology with an equivalent level of energy efficiency.

(This mitigation measure applies to Entrada South without change. This mitigation measure is not applicable to Valencia Commerce Center because no private recreation center is proposed.)

Mobile Sources

- **2-4.** Prior to the issuance of residential building permits, the project applicant or its designee shall submit building design plans, to Los Angeles County for review and approval, which demonstrate that each residence within the RMDP/SCP project site subject to application of Title 24, Part 6, of the California Code of Regulations shall be equipped with a minimum of one single-port electric vehicle (EV) charging station. Each charging station shall achieve a similar or better functionality as a Level 2 charging station.

Additionally, prior to the issuance of the first building permit for the RMDP/SCP project site, the project applicant or its designee shall establish and fund a dedicated account for the provision of subsidies for the purchase of zero emission vehicles (ZEVs), as defined by CARB. The project applicant or its designee shall provide proof of the account's establishment and funding to Los Angeles County.

The dedicated account shall be incrementally funded, for each village-level project, in an amount that equals the provision of a \$1,000 subsidy per residence – on a first-come, first-served basis – for 65 percent of the village's total residences subject to application of Title 24, Part 6, of the California Code of Regulations.

(This mitigation measure applies to Entrada South without change. This mitigation measure is not applicable to Valencia Commerce Center because no residential development is proposed.)

- **2-5.** Prior to the issuance of commercial building permits, the project applicant or its designee shall submit building design plans, to Los Angeles County, which demonstrate that the parking areas for commercial buildings on the RMDP/SCP project site shall be equipped with electric vehicle (EV) charging stations that provide charging opportunities to 7.5 percent of the total number of required parking spaces. ("Commercial buildings" include retail, light industrial, office, hotel, and mixed-use buildings.)

The EV charging stations shall achieve a similar or better functionality as a Level 2 charging station. In the event that the installed charging stations use functionality/technology other than Level 2 charging stations, the parameters of the mitigation obligation (i.e., number of parking spaces served by EV charging stations) shall reflect the comparative equivalency of Level 2 charging stations to the installed charging stations on the basis of average charge rate per hour. For purposes of this equivalency demonstration, Level 2 charging stations shall be assumed to provide charging capabilities of 25 range miles per hour.

(This mitigation measure applies to Entrada South and Valencia Commerce Center without change.)

- **2-6.** The project applicant-submitted Newhall Ranch Transportation Demand Management (TDM) Plan, located in Final AEA Appendix 7, shall be implemented to reduce vehicle miles traveled (VMT) resulting from project build out with oversight from Los Angeles County. The TDM Plan is designed to influence the transportation

choices of residents, students, employees, and visitors, and serves to enhance the use of alternative transportation modes both on and off the project site through the provision of incentives and subsidies, expanded transit opportunities, bikeshare and carshare programs, technology-based programs, and other innovative means. Village-level implementation of relevant elements of the TDM Plan shall proceed in accordance with village-level applicability supplements prepared by a qualified transportation engineer that are reviewed and considered by Los Angeles County when approving tentative subdivision maps for land developments that are part of the project.

Accordingly, the TDM Plan identifies key implementation actions that are critical to the effectiveness of the VMT-reducing strategies, as well as timeline and phasing requirements, monitoring standards, and performance metrics and targets tailored to each of the strategies.

In accordance with the TDM Plan, a non-profit Transportation Management Organization (TMO) or equivalent management entity shall be established to provide the services required, as applicable.

(This mitigation measure applies to Entrada South and Valencia Commerce Center without change.)

- **2-7.** Prior to the issuance of traffic signal permits, the project applicant or its designee shall work with Los Angeles County and the California Department of Transportation (Caltrans), as applicable, to facilitate traffic signal coordination along:
 1. State Route 126 from the Los Angeles County line to the Interstate 5 north-bound ramps;
 2. Chiquito Canyon Road, Long Canyon Road, and Valencia Boulevard within the RMDP/SCP Project site;
 3. Magic Mountain Parkway from Long Canyon Road to the Interstate 5 north-bound ramps; and,
 4. Commerce Center Drive from Franklin Parkway to Magic Mountain Parkway.

To effectuate the signal synchronization and specifically the operational and timing adjustments needed at affected traffic signals, the project applicant or its designee shall submit traffic signal plans for review and approval, and/or pay needed fees as determined by Los Angeles County or Caltrans, as applicable.

A majority of the signals that will be synchronized will be new signals constructed/installed by the project. Thus, for these signals, the project will provide the necessary equipment at the signal controller cabinet, as well as within the new roadways themselves, to enable and facilitate synchronization. The project is responsible for paying 100 percent of the applicable fee amount for the signal synchronization work, with assurance that the necessary funding will be available to fully implement this measure.

(This mitigation measure applies to the traffic signals within each project area of Entrada South and Valencia Commerce Center without change.)

- **2-8.** Consistent with the parameters of the Newhall Ranch TDM Plan, the project applicant or its designee shall provide Los Angeles County with proof that funding has been provided for the purchase, operation and maintenance of zero emission school buses in furtherance of the school bus program identified in the project's TDM Plan. The proof of funding shall be demonstrated incrementally as the school bus program is paced to village-level occupancy and student enrollment levels.

(This mitigation measure applies to Entrada South without change. This mitigation measure is not applicable to Valencia Commerce Center because no residential development is proposed.)

- **2-9.** Prior to the issuance of the first 2,000th residential building permit within the RMDP/SCP project site and every 2,000th residential building permit thereafter, the project applicant or its designee shall provide Los Angeles County with proof that it has provided a subsidy of \$100,000 per bus for the replacement of up to 10 diesel or compressed natural gas transit buses with zero emission buses to the identified transit provider(s).

(The Entrada South Project shall be responsible for its proportional share of the referenced subsidies. This mitigation measure is not applicable to Valencia Commerce Center because no residential development is proposed.)

Construction Sources

- **2-10.** Prior to issuing grading permits for village-level development within the RMDP/SCP project site, Los Angeles County shall confirm that the project applicant or its designee shall fully mitigate the construction and vegetation change GHG emissions associated with each such grading permit (the "Incremental Construction GHG Emissions") by relying upon one of the following compliance options, or a combination thereof, in accordance with the project applicant-submitted Newhall Ranch GHG Reduction Plan (GHG Reduction Plan; see Final AEA Appendix 6):
 - Directly undertake or fund activities that reduce or sequester GHG emissions ("Direct Reduction Activities") and retire the associated "GHG Mitigation Credits" in a quantity equal to the Incremental Construction GHG Emissions. A "GHG Mitigation Credit" shall mean an instrument issued by an Approved Registry that satisfies the performance standards set forth in the GHG Reduction Plan and shall represent the estimated reduction or sequestration of one metric tonne of carbon dioxide equivalent that will be achieved by a Direct Reduction Activity that is not otherwise required (California Environmental Quality Act [CEQA] Guidelines Section 15126.4(c)(3)). An "Approved Registry" is an accredited carbon registry as defined by the GHG Reduction Plan; or
 - Obtain and retire "Carbon Offsets" in a quantity equal to the Incremental Construction GHG Emissions. "Carbon Offset" shall mean an instrument issued by an Approved Registry that satisfies the performance standards set forth in the GHG Reduction Plan and shall represent the past reduction or sequestration of one metric tonne of carbon dioxide equivalent achieved by a Direct Reduction Activity or any other GHG emission reduction project or activity that is not otherwise required (CEQA Guidelines Section 15126.4(c)(3)).

(This mitigation measure applies to Entrada South and Valencia Commerce Center without change.)

Local/Off-site Mitigation

- **2-11.** Prior to the issuance of building permits for development within the RMDP/SCP project site, the project applicant or its designee shall undertake or fund Direct Reduction Activities pursuant to the Building Retrofit Program ("Retrofit Program"), as included in Final AEA Appendix 13 to improve the energy efficiency of existing buildings located primarily in disadvantaged communities (as defined in the Retrofit Program). The project applicant or its designee shall retire GHG Mitigation Credits or Carbon Offsets issued by an Approved Registry based on such Direct Reduction Activities in a quantity equal to the sum of the following (together, the "Retrofit Reduction Requirement") as included in Final AEA Appendix 13:
 - For the residential portion of a building permit application, the product of the planned number of residential units for the village-level project multiplied by 0.0377 MTCO₂e;
 - For the commercial portion of a building permit application, the product of the planned commercial development per thousand commercial square feet multiplied by 0.0215 MTCO₂e. ("Commercial development" includes retail, light industrial, office, hotel and mixed-use buildings.)

Building retrofits covered by the Retrofit Program can include, but are not limited to: cool roofs, solar panels, solar water heaters, smart meters, energy efficient lighting (including, but not limited to, light bulb replacement), energy efficient appliances, energy efficient windows, pool covers, insulation, and water conservation measures.

The Retrofit Program shall be implemented within the geographic area defined to include Los Angeles County and primarily within disadvantaged communities, as defined by the Retrofit Program, or in other areas accepted by the Los Angeles County Planning Director.

(This mitigation measure applies to Entrada South without change. This mitigation measure applies to Valencia Commerce Center without change, other than that the residential portion of this mitigation measure does not apply to the Valencia Commerce Center because no residential development is proposed.)

- **2-12.** Prior to the issuance of the first building permit for the RMDP/SCP project site, the project applicant or its designee shall provide Los Angeles County with proof of installation of EV charging stations capable of serving 20 off-site parking spaces. Thereafter, the project applicant or its designee shall provide Los Angeles County proof of installation of EV charging stations prior to the issuance of residential and commercial building permits per the following ratios: one (1) off-site parking space shall be served by an electric vehicle charging station for every 30 dwelling units, and one (1) off-site parking space shall be served by an electric vehicle charging station for every 7,000 square feet of commercial development. ("Commercial development" includes retail, light industrial, office, hotel and mixed-use buildings.) Off-site EV charging stations capable of servicing 2,036 parking spaces would be required if the maximum allowable development facilitated by the RMDP/SCP project

occurs; fewer EV charging stations would be required if maximum build-out under the RMDP/SCP project does not occur.

The EV charging stations shall achieve a similar or better functionality as a Level 2 charging station and may service one or more parking spaces. In the event that the installed charging stations use functionality/technology other than Level 2 charging stations, the parameters of the mitigation obligation (i.e., number of parking spaces served by EV charging stations) shall reflect the comparative equivalency of Level 2 charging stations to the installed charging stations on the basis of average charge rate per hour. For purposes of this equivalency demonstration, Level 2 charging stations shall be assumed to provide charging capabilities of 25 range miles per hour.

The EV charging stations shall be located within the geographic area defined to include Los Angeles County. The EV charging stations shall be in areas that are generally accessible to the public, such as areas that include, but are not limited to, retail centers, employment centers and office complexes, recreational facilities, schools, and other categories of public facilities.

(This mitigation measure applies to Entrada South without change. This mitigation measure applies to Valencia Commerce Center without change, other than that the residential portion of this mitigation measure does not apply to the Valencia Commerce Center because no residential development is proposed.)

- **2-13.** In addition to Mitigation Measures 2-1 through 2-12, the project applicant or its designee shall offset GHG emissions to zero by funding or undertaking Direct Reduction Activities or, if necessary, obtaining Carbon Offsets through the Newhall Ranch GHG Reduction Plan. The project applicant-submitted Newhall Ranch GHG Reduction Plan focuses on achieving GHG reductions or sequestration through the Direct Reduction Activities in coordination with an Approved Registry, such as the Climate Action Reserve. If these Direct Reduction Activities do not achieve the necessary amount of GHG reductions, the project applicant or its designee can obtain Carbon Offsets issued by an Approved Registry.

Prior to issuing building permits for development within the RMDP/SCP project site, Los Angeles County shall confirm that the project applicant or its designee shall fully offset the project's remaining (i.e., post implementation of Mitigation Measures 2-1 through 2-12) operational GHG emissions over the 30-year project life associated with each such building permit (the "Incremental Operational GHG Emissions") by relying upon one of the following compliance options, or a combination thereof, in accordance with the Newhall Ranch GHG Reduction Plan:

- Undertake or fund Direct Reduction Activities that are estimated to result in GHG Mitigation Credits, as described in the GHG Reduction Plan, and retire such GHG Mitigation Credits in a quantity equal to the Incremental Operational GHG Emissions;
- Undertake or fund Direct Reduction Activities and retire the Carbon Offsets in a quantity equal to the Incremental Operational GHG Emissions; or
- If necessary, as determined by the Los Angeles County Planning Director in accordance with the GHG Reduction Plan, to fully offset Incremental Operational

GHG Emissions, the project applicant or its designee may purchase and retire Carbon Offsets that have been issued by an Approved Registry in a quantity equal to the Incremental Operational GHG Emissions.

Compliance with Mitigation Measure (MM) 2-13 shall be demonstrated incrementally prior to obtaining building permits.

The incremental Operational GHG Emissions shall be equal to the sum of (1) the number of proposed residential units covered by the applicable building permit multiplied by a "GHG Residential Ratio" and (2) every thousand square feet of proposed commercial development covered by the applicable building permit multiplied by a "GHG Commercial Ratio." ("Commercial development" includes retail, light industrial, office, hotel, and mixed-use buildings.) GHG Residential Ratio and GHG Commercial Ratio shall mean the emissions ratios in MTCO₂e set forth in the applicable CEQA analysis completed by the County of Los Angeles for a specific village-level project to ensure that the related GHG emissions are reduced to zero.

(This mitigation measure applies to Entrada South without change. This mitigation measure applies to Valencia Commerce Center without change, other than that the residential portion of this mitigation measure does not apply to the Valencia Commerce Center because no residential development is proposed.)

Supplemental Commitment

In connection with the RMDP/SCP project, the applicant set forth a supplemental commitment that CDFW incorporated into the RMDP/SCP project's Mitigation Monitoring and Reporting Plan. That supplemental commitment is set forth in full below, with an italicized parenthetical that explains its application to the Modified Project. The supplemental commitment further reduces GHG emissions beyond the net zero emissions calculated above.

- In addition to the installation of EV charging stations required by Mitigation Measures 2-5 and 2-12, and although not required for the project to achieve net zero GHG emissions, the project applicant or its designee shall provide Los Angeles County with proof of installation of EV charging stations prior to the issuance of residential and commercial building permits per the following ratios: one (1) parking space shall be served by an electric vehicle charging station for every 50 dwelling units, and one (1) parking space shall be served by an electric vehicle charging station for every 15,900 square feet of commercial development. ("Commercial development" includes retail, light industrial, office, hotel and mixed-use buildings.) EV charging stations capable of servicing 1,010 parking spaces would be required if the maximum allowable development facilitated by the RMDP/SCP project occurs; fewer EV charging stations would be required if maximum build-out under the RMDP/SCP project does not occur.

The EV charging stations shall achieve a similar or better functionality as a Level 2 charging station and may service one or more parking spaces. In the event that the installed charging stations use functionality/technology other than Level 2 charging stations, the parameters of the mitigation obligation (i.e., number of parking spaces served by EV charging stations) shall reflect the comparative equivalency of Level 2 charging stations to the installed charging stations on the basis of average charge

rate per hour. For purposes of this equivalency demonstration, Level 2 charging stations shall be assumed to provide charging capabilities of 25 range miles per hour.

The EV charging stations shall be located either on the project site or within the jurisdictional area of the Southern California Association of Governments. The EV charging stations shall be in areas that are generally accessible to the public, such as areas that include, but are not limited to, retail centers, employment centers and office complexes, recreational facilities, schools, and other categories of public facilities.

(This supplemental commitment applies to Entrada South without change. This mitigation measure applies to Valencia Commerce Center without change, other than that the residential portion of this mitigation measure does not apply to the Valencia Commerce Center because no residential development is proposed.)

2.2 Description of Project Modifications

Entrada South: The proposed incremental changes in Entrada South, as compared to the 2017 Approved Project analyzed in the State-certified EIR, include:

Enhanced Environmental Protections. The Modified Project increases environmental protections to wetlands and related biological resources within the Entrada Planning Area that result in increased open space, restored drainage areas, and habitat for species as compared to that evaluated in the State-certified EIR.

Refinements to the Balance of Residential and Non-Residential Development. The State-certified EIR for the 2017 Approved Project evaluated the environmental impacts of 1,725 dwelling units, 450,000 square feet of non-residential development, a public facilities area for a neighborhood park and a potential school site, private recreational amenities, a spineflower preserve, and trails and infrastructure within the Entrada Planning Area. The County's adopted One Valley One Vision Plan land use designations for the Project site authorize 1,524 dwelling units and 730,000 square feet of non-residential land uses. The Modified Project includes a reduction in residential units to conform to the One Valley One Vision Area Plan, resulting in 1,574 dwelling units and a corresponding increase to 730,000 square feet of non-residential development, a public park and potential school site, a spineflower preserve, and trails and infrastructure within the Entrada Planning Area. As such, this analysis considers the GHG and energy implications of reducing the number of residences by 151 units and increasing the amount of non-residential land use by 280,000 square feet.

The Entrada South land uses modeled for this analysis are summarized below in **Table 1.**

Table 1. Entrada South Land Uses					
Modified Project	CalEEMod® Analysis				
	CalEEMod® Land Use Subtype	State-Certified EIR	Modified Project	Incremental Land Use	Size Metric
Condo/Townhouse General	Condo/Townhouse	1,725	1,574	-151	DU
Mixed-Use Commercial	Regional Shopping Center/ Office Park	450	730	280	TSF
Elementary School	Elementary School	750	750	0	STU
Public Neighborhood Park and Private Recreational Center	City Park	5.0	5.0	0	Acre
	Recreational Center*	2.5	2.5	0	TSF
Abbreviations: CalEEMod® = California Emissions Estimator Model DU = dwelling unit STU = students TSF = thousand square feet * Recreational centers referenced as "health clubs" as a land use subtype in CalEEMod.					

Valencia Commerce Center (VCC): As relevant background, VCC was approved for development by Los Angeles County through the issuance of various entitlements and certification of an EIR (SCH No. 1987-123005) in 1991 (referred to herein as the County-certified VCC EIR), which is incorporated by reference. The County's existing entitlement allows approximately 12.6 million square feet of industrial/business park space at build-out, of which approximately 9 million square feet has been constructed.

The VCC Planning Area evaluated herein is comprised of approximately 321 acres of an undeveloped portion of the partially completed VCC industrial/business park center. The VCC Planning Area will be developed with up to 3.4 million square feet of non-residential development under the Modified Project, consistent with the development of the VCC Planning Area assumed in the State-certified EIR. The VCC Planning Area development will be consistent with the existing County entitlements and Zoning Code; therefore, the Modified Project does not result in a change to the amount or nature of the development associated with the 2017 Approved Project.

The proposed minor changes and refinements under the Modified Project, as compared to the 2017 Approved Project analyzed in the State-certified EIR, include:

Enhanced Environmental Protections. The proposed minor changes and refinements within the VCC Planning Area include additional environmental protections for wetlands and related biological resources within the VCC Planning Area through a reduction in permanent impacts to Hasley Creek and Castaic Creek. This environmentally beneficial

modification would result in increased open space, restored drainage areas, and habitat for species.

The Valencia Commerce Center land uses modeled for this analysis are summarized below in **Table 2**.

Table 2. Valencia Commerce Center Land Uses					
Modified Project	CalEEMod® Analysis				
	CalEEMod® Land Use Subtype	State-Certified EIR	Modified Project	Incremental Land Use	Size Metric
Industrial Park/Business Park	Industrial Park/Office Park	3,400	3,400	0	TSF
Abbreviations: CalEEMod® = California Emissions Estimator Model DU = dwelling unit STU = students TSF = thousand square feet					

2.3 Regulatory Setting

The State-certified EIR included a Regulatory Setting section that discussed key federal, state, and local regulations and programs related to GHG emissions resulting from the 2017 Approved Project. (See State-certified EIR, Section 2.2.) This section incorporates the State-certified EIR Section 2.2 by reference and provides these updates.

2.3.1 Federal

Update to Fuel Economy Standards. In September 2019, the Trump Administration adopted Part 1 of the Safer Affordable Fuel Efficient Vehicles (SAFE) Rule, which rescinded the waiver the U.S. Environmental Protection Agency (EPA) granted California to regulate vehicle greenhouse gas emissions and to implement a zero-emission vehicle program. In March 2020, as Part 2 of the SAFE Rule, the EPA completed updated GHG and fuel economy standards for passenger cars and light trucks and established new, less stringent standards covering model years 2021 through 2026. With the release of EO 13990, the Biden Administration has ordered all relevant federal agencies, including the EPA, to review environmental regulations that were adopted by the Trump Administration. These agencies are to consider suspending, revising, or rescinding those that are inconsistent with the Biden Administration's agenda on climate policy.³ In accordance with EO 13990, the SAFE Rule is subject to ongoing litigation and on February 8, 2021, the D.C. Circuit Court of Appeal granted the Biden Administration's motion to stay litigation over Part 1 of the SAFE Rule. In April 2021, EPA announced that

³ Available at: <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-protecting-public-health-and-environment-and-restoring-science-to-tackle-climate-crisis/>. Accessed: March 2021.

it would formally review the SAFE Rule, which could lead to California being able to set its own car emissions standards again.⁴

Rescission of Clean Power Plan. In June 2019, the EPA issued the final Affordable Clean Energy rule, which became effective in August 2019. It officially rescinded the Clean Power Plan rule issued during the Obama Administration and set emissions guidelines for states in developing plans to limit CO₂ emissions from coal-fired power plants. However, on January 19, 2021, the D.C. Circuit Court of Appeals vacated the Affordable Clean Energy rule and remanded it to the EPA to revise the regulations.

2.3.2 State

Cap-and-Trade Extension. The cap-and-trade program was first slated to sunset in 2020, but the passage of Assembly Bill (AB) 398 in 2017 extended the program through 2030.⁵

SB 100. On September 10, 2018, Governor Jerry Brown signed SB 100, which further increased California's Renewables Portfolio Standard and requires retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, and that the California Air Resources Board ("CARB") should plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.⁶

Scoping Plan and Implementation. In December 2017, CARB adopted the 2017 Climate Change Scoping Plan Update (2017 Scoping Plan) to address the 2030 target for the State. The 2017 Scoping Plan establishes a new emissions limit of 260 MMTCO₂e for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030. In 2018, CARB issued a Progress Report that concluded that California was not on track to meet the greenhouse gas reductions expected under SB 375 for 2020 and additional steps were needed to meet VMT reduction goals.⁷ In September 2020, CARB held a public workshop to solicit input on its development of the Advanced Clean Cars II regulations, which will seek to reduce criteria and greenhouse gas emissions from new light- and medium-duty vehicles beyond the 2025 model year, and increase the number of zero emission vehicles for sale. In February 2021, the State Auditor issued a report that CARB had not adequately supported the cost-effectiveness of its electric vehicle incentive programs relative to its regulatory programs, to which CARB responded with measures intended to address the Auditor's findings.⁸ In February 2021, the D.C. Circuit Court of Appeal granted the Biden Administration's motion to stay litigation over Part 1

⁴ Available at: <https://www.epa.gov/newsreleases/epa-reconsiders-previous-administrations-withdrawal-californias-waiver-enforce>. Accessed: April 2021.

⁵ Available at: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB398. Accessed: March 2021.

⁶ Available at: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB100. Accessed: March 2021.

⁷ Available at: https://ww2.arb.ca.gov/sites/default/files/2018-11/Final2018Report_SB150_112618_02_Report.pdf. Accessed: March 2021.

⁸ Available at: http://auditor.ca.gov/pdfs/reports/2020-114.pdf?mc_cid=d8efa40eae&mc_eid=d16aa0f2e1. Accessed: March 2021.

of the SAFE Rule, which had rescinded the waiver EPA granted California to regulate vehicle GHG emissions and to implement a zero emission vehicle program.

Executive Order B-55-18. Executive Order B-55-18, signed by Governor Brown on September 10, 2018, sets a goal “to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter.”⁹

Executive Order N-79-20. On September 23, 2020, Governor Newsom signed Executive Order N-79-20, which directs CARB to develop and propose regulations that would require a ramp up to 100% in-state sales of new zero-emission passenger vehicles (cars and trucks) and drayage trucks by 2035. It also directs CARB to promulgate regulations that would require a ramp up to 100% in-state sales of medium- and heavy-duty trucks by 2045 “for all operations where feasible.”¹⁰

Update to SB 375 Targets. Beginning October 1, 2018, the SB 375 emissions reduction target for SCAG changed to 19 percent for 2035.¹¹

Update to Low Carbon Fuel Standard. In September 2018, CARB amended the standards to require a 20 percent reduction in carbon intensity of fuels by 2030, aligning with California’s 2030 targets set by SB 32.¹²

Title 24 Energy Efficiency Standards. The 2019 Standards went into effect on January 1, 2020, and improve upon the 2016 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings.¹³ The California Green Building Standards Code was recently updated as part of the Title 24 Building Energy Efficiency Standards and became effective on January 1, 2020, includes both voluntary and mandatory energy efficiency standards for commercial and residential buildings.

2.3.3 Regional/Local

Sustainable Communities Strategy. On September 1, 2020, SCAG’s Regional Council adopted an updated Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) known as the 2020– 2045 RTP/SCS or Connect SoCal. The SB 375 emissions reduction target for the Southern California region under SCAG’s jurisdiction in 2035 was updated to a reduction in per capita GHG emissions of 19 percent. This new target was incorporated into Connect SoCal.¹⁴

Los Angeles Countywide Sustainability Plan. The County of Los Angeles adopted the “Our County Los Angeles Countywide Sustainability Plan” in August 2019 that considered

⁹ Available at: <https://www.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf>. Accessed: March 2021.

¹⁰ Available at: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=235717&DocumentContentId=68659>. Accessed: March 2021.

¹¹ Available at: <https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets>. Accessed: March 2021.

¹² Available at: <https://ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard/lcfs-regulation>. Accessed: March 2021.

¹³ Available at: <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency>. Accessed: March 2021.

¹⁴ Available at: <https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx>. Accessed: March 2021.

long-term sustainability planning goals within Los Angeles County. The plan is a set of non-binding goals, strategies, and actions.¹⁵

Los Angeles County Climate Action Plan. The County of Los Angeles released a draft of the Los Angeles County Climate Action Plan (CAP) for public review in March 2020. The LA County CAP targets carbon neutrality within the County by 2045. The County aims to release a revised public draft of the CAP and an accompanying EIR later this year.¹⁶

¹⁵ Available at: <https://ourcountyla.lacounty.gov/>. Accessed: March 2021.

¹⁶ Available at: https://planning.lacounty.gov/assets/upl/case/2019-002015_cap-public-review-draft.pdf. Accessed: April 2021.

3. GREENHOUSE GAS IMPACTS

This section evaluates the potential significance of the Modified Project's GHG emissions by reference to the following questions from Section VII, Greenhouse Gas Emissions, of Appendix G of the CEQA Guidelines:¹⁷

Threshold 1. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Threshold 2. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The following sections assess the potential significance of the Modified Project's greenhouse gas emissions for purposes of CEQA.

3.1 Methodology

The methodology used to quantify GHG emissions for the Modified Project is consistent with the methodology used in the State-certified EIR. The Modified Project analyzes emissions using the newest approved versions of estimator models; i.e., CalEEMod[®] version 2016.3.2¹⁸ was used to calculate operational GHG emissions. The mobile emission factors in CalEEMod[®] v2016.3.2 are based on the CARB EMFAC2014 program. However, EMFAC2017¹⁹ was released by CARB in December 2017 and approved by the US EPA in August 2019.²⁰ Therefore, EMFAC2017 emission factors have been incorporated into the analysis for the Modified Project. **Appendix A**, CalEEMod[®] outputs, shows the updated analysis for Entrada South.

3.2 Construction Emissions

Construction emissions associated with the Modified Project would not exceed the emissions reported in the State-certified EIR. For Entrada South, the Project footprint for horizontal construction or earthwork (e.g., site preparation, grading, demolition, and utilities installation) remains consistent with the analysis reported in the State-certified EIR. Therefore, the construction emissions from those sub-phases of construction are not anticipated to increase due to the Modified Project. Furthermore, while the Modified Project will result in a change in land use sub-types compared to what was assumed in the State-certified EIR, the overall square footage of development would be approximately the same under the Modified Project and the amount of vertical construction evaluated in the State-certified EIR was conservatively represented, as described further below. Thus, the calculated construction emissions for the vertical construction also is not expected to increase.

¹⁷ CEQA Appendix G: Environmental Checklist Form. Available at: <http://resources.ca.gov/ceqa/docs/ab52/final-approved-appendix-G.pdf>. Accessed: July 2019.

¹⁸ SCAQMD. 2016. California Emissions Estimator Model[®]. Available at: <http://www.CalEEMod.com/>. Accessed: March 2021.

¹⁹ CARB. 2017. Emission Factor Model. Available at: <https://arb.ca.gov/emfac/emissions-inventory>. Accessed: March 2021.

²⁰ The USEPA published a notice of availability for the official release of EMFAC2017 motor vehicle emission factor model use in the state of California. Available at: <https://www.federalregister.gov/documents/2019/08/15/2019-17476/official-release-of-emfac2017-motor-vehicle-emission-factor-model-for-use-in-the-state-of-california>. Accessed: March 2021.

The State-certified EIR very conservatively assumed that construction equipment mixes for all years were the same as the year with the maximum amount of construction for each sub-phase, even though the non-maximum years would have reduced construction equipment mixes. For example, although the building construction sub-phase spans multiple years, the off-road equipment mix for every year is assumed to be equal to that needed for the year with the most construction. Given this conservative assumption, the construction modeling parameters in the non-maximum years assumed more construction activity than was expected to be needed, and total GHG emissions were overestimated. In addition, the mix of construction equipment is expected to get cleaner over time (i.e., generate fewer emissions on average) as older equipment is replaced or repowered.

For Entrada South, the land use mix associated with the Project modifications involves an increase in commercial square footage (from 450,000 square foot (SF) to 730,000 SF) and a reduction in residential development (from 1,725 units to 1,574 units, or from 3,235,100 SF to 2,951,913 SF).²¹ These Project modifications would result in approximately the same overall floor area ratio (FAR) as that assumed in the State-certified EIR.²² Therefore, the type and number of construction equipment and the related construction intensity would fall within the envelope of construction activity that was previously analyzed, and the Project modifications for Entrada South would not increase construction emissions relative to those disclosed in the State-certified EIR.

For VCC, the Project would not change the Project footprint, proposed land uses, nor the total building square footage compared to what was assumed in the State-certified EIR. Therefore, construction emissions from all aspects of VCC are not anticipated to increase.

In summary, construction GHG emissions from the Modified Project will not result in any new or more severe significant impacts. As described above, neither the horizontal or vertical construction activities are expected to increase construction emissions. Total GHG emissions are 12,403 MT CO₂e for Entrada South and 13,386 MT CO₂e for VCC, as calculated in the State-certified EIR.²³ The emissions are amortized over 30 years and shown in **Tables 3 and 4** below. Importantly, the mitigation framework from the State-certified EIR will apply to the Modified Project and therefore there will not be any net increase in GHG emissions. Specifically, mitigation measure 2-10 from the State-certified EIR requires construction GHG emissions to be mitigated to zero. This mitigation measure will continue to apply to the Modified Project, and therefore net GHG emissions during construction will remain zero. Accordingly, construction-related GHG impacts will continue to be less than significant.

²¹ The square footage totals for the residential units referenced in the parenthetical are calculated based on an average unit size of 1,875 square feet.

²² The 2017 Approved Project included an estimated 3,685,100 SF of development area within the Entrada planning area (450,000 SF of commercial development and 3,235,100 SF of residential development). The Modified Project would include an estimated 3,681,913 SF of development area within the Entrada planning area (730,000 SF of commercial development and 2,951,913 SF of residential development). As such, the Modified Project would result in a net reduction of approximately 3,187 SF of development area within the Entrada planning area when compared to the 2017 Approved Project.

²³ See Tables 2-7 through 2-9 of Draft Additional Environmental Analysis for Stages 5 and 6 construction, Appendix 1 (Ramboll, 2016. Greenhouse Gas Emissions Technical Report and Appendices). Available at: <http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=133612>.

3.3 Operational Emissions

The State-certified EIR disclosed unmitigated operational GHG emissions for Entrada South and Valencia Commerce Center and mitigated operational GHG emissions for the overall RMDP/SCP Project. Operational GHG emissions sources analyzed in the State-certified EIR include the following categories:

- Area sources: Combustion emissions from landscaping equipment.
- Building energy use: Indirect emissions from electricity production and direct emissions from natural gas combustion.
- Water use: Indirect emissions from electricity need to supply, treat, and distribute water and wastewater; and direct emissions from wastewater.
- Solid waste: Direct emissions from solid waste disposal.
- Traffic: Starting, running, and idling emissions from vehicle use.

To evaluate greenhouse gas impacts, this methodology analyzes estimated emissions for the changes associated with the Modified Project. The State-certified EIR utilized an earlier version of the emissions estimation model — the CalEEMod® version 2013.2.2 model. Currently, the South Coast Air Quality Management District (SCAQMD) and Los Angeles County recommend using CalEEMod® version 2016.3.2 to estimate emissions. The updated CalEEMod® modeling utilizes land use subtypes that are consistent with those presented in the Modified Project's traffic analysis; these subtypes provide the most current representation of the anticipated development mix for the Modified Project Area. In addition, changes in regulations such as the Title 24 Building Energy Efficiency Standards and Renewable Portfolio Standard electricity requirements have occurred since the 2017 Approved Project analyses. Accordingly, this analysis accounts for these modeling changes and discloses any changes in emissions associated with the changes in the Modified Project.

Unmitigated emissions from the State-certified EIR and a brief description of changes due to the Modified Project for Entrada South are shown in **Table 3**, and for Valencia Commerce Center are shown in **Table 4**. (The one-time change in vegetation sequestration or carbon release is also included in **Table 3** and **Table 4**.) As illustrated in **Tables 3** and **4**, unmitigated operational GHG emissions from the Modified Project are expected to be slightly higher than those disclosed in the State-certified EIR. Emissions from some source categories will decrease due to increasingly stringent statewide regulatory requirements, while emissions from other source categories may increase or decrease as a result of the Modified Project's refined land use mix.

Table 3. Unmitigated Entrada South GHG Emissions from the State-Certified EIR and the Modified Project (MT CO₂e/yr)				
Category	State-Certified EIR ^a	Total Estimated Emissions	Incremental Change from Modified Project	Discussion
Area	30	27	-3	Reduction in residential units
Building Energy	4,835	2,783	-2,051	Refinements to the balance of residential and non-residential development; adoption of 2019 Title 24 standards; enactment of Senate Bill 100's (SB100) expanded and accelerated Renewables Portfolio Standard
Water	1,295	619	-677	Reduced water demand estimate and SB100 requirements
Solid Waste	1,438	2,570	+1,132	Refinements to the balance of residential and non-residential development; more recent CalRecycle solid waste disposal data
Traffic	26,294	30,080	+3,786	Refinements to the balance of residential and non-residential development; acceptance by USEPA of EMFAC2017 model
Sub-Total	33,892	36,079	+2,188	
Construction Amortized	413	413	0	No change
Vegetation Amortized ^b	28	19	-9	Reduced land disturbance associated with environmental protections
Total Unmitigated	34,333	36,512	+2,179	
Total Mitigated (see Table 5, below)	0	0	0	Mandatory mitigation measures from the State-certified EIR, which was reviewed and approved by the California Air Resources Board, apply to the Modified Project to ensure that onsite emissions are reduced to the extent feasible and remaining emissions are reduced to zero through the GHG Reduction Plan.

Table 3. Unmitigated Entrada South GHG Emissions from the State-Certified EIR and the Modified Project (MT CO₂e/yr)				
Category	State-Certified EIR ^a	Total Estimated Emissions	Incremental Change from Modified Project	Discussion
Supplemental EV Charger Commitment	-1,499	-1,499	Same supplemental EV charger commitment as the State-Certified EIR	GHG reductions from the Applicant's Supplemental EV Charger Commitment were in addition to the thirteen mitigation measures that reduced the project to net-zero GHG emissions. Therefore, the Project further reduced GHG emissions below net zero.
<p><u>Notes:</u></p> <p>^a See Table ES-2 of Draft AEA, Appendix 1 (Ramboll, 2016. Greenhouse Gas Emissions Technical Report and Appendices). Available at: http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=133612.</p> <p>^b One-time vegetation emissions were calculated as shown in Appendix A and amortized over 30 years.</p> <p><u>Abbreviations:</u></p> <p>MT CO₂e – metric tons of carbon dioxide equivalents</p> <p>yr – year</p>				

Table 4. Unmitigated Valencia Commerce Center Operational GHG Emissions from the State-Certified EIR and the Modified Project (MT CO₂e/yr)				
Category	State-Certified EIR ^a	Total Estimated Emissions	Incremental Change from Modified Project	Discussion
Area	0.09	0.09	0	No change
Building Energy	9,155	9,155	0	No change (Note that if quantified, enactment of Senate Bill 100's (SB100) expanded and accelerated Renewables Portfolio Standard would decrease emissions from energy usage)
Water	516	516	0	No change (Note that if quantified, enactment of Senate Bill 100's (SB100) expanded and accelerated Renewables Portfolio Standard would decrease emissions from energy usage for water conveyance)
Solid Waste	3,601	3,601	0	No change
Traffic	22,963	22,963	0	No change
Sub-Total	36,234	36,234	0	
Construction Amortized	446	446	0	No change
Vegetation Amortized ^b	-5	-49	-44	Reduced land disturbance associated with environmental protections would create additional carbon sequestration.
Total Unmitigated	36,676	36,627	0	
Total Mitigated (see Table 5, below)	0	0	0	Mandatory mitigation measures from the State-certified EIR, which was reviewed and approved by the California Air Resources Board, apply to the Modified Project to ensure that onsite emissions are reduced to the extent feasible and remaining emissions are reduced to zero through the GHG Reduction Plan.

Table 4. Unmitigated Valencia Commerce Center Operational GHG Emissions from the State-Certified EIR and the Modified Project (MT CO₂e/yr)				
Category	State-Certified EIR ^a	Total Estimated Emissions	Incremental Change from Modified Project	Discussion
Supplemental EV Charger Commitment	-4,166	-4,166	Same supplemental EV charger commitment as the State-Certified EIR	GHG reductions from the Applicant's Supplemental EV Charger Commitment were in addition to the thirteen mitigation measures that reduced the project to net-zero GHG emissions. Therefore, the project further reduced emissions below net zero.
<p><u>Notes:</u></p> <p>^a See Table ES-2 of Draft AEA, Appendix 1 (Ramboll, 2016. Greenhouse Gas Emissions Technical Report and Appendices). Available at: http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=133612.</p> <p>^b Based on a calculation from the CalEEMod® users guide.</p> <p><u>Abbreviations:</u></p> <p>MT CO₂e – metric tons of carbon dioxide equivalents</p> <p>N/A – not applicable</p> <p>yr – year</p>				

Overall, the total unmitigated emissions from the Modified Project are expected to increase very slightly relative to the emissions previously presented in the State-certified EIR, i.e., an increase of approximately 3%. However, as shown below, with continued implementation of Mitigation Measures 2-1 through 2-13, the Mitigated Modified Project's net GHG emissions after mitigation would be reduced to zero. Mitigation Measures 2-1 through 2-13 were reviewed and approved by CARB, which confirmed that the evidence supported a conclusion that the mitigation measures would reduce GHG emission to net zero.²⁴ As a result, the Modified Project as mitigated would have no net increase in GHG emissions and would not have a significant impact on global climate change for purposes of Threshold 1. In addition, with the Supplemental EV Charger Commitment would result in GHG reductions of 1,499 MTCO₂e/year and 4,166 MTCO₂e/year beyond the net zero for Entrada South and Valencia Commerce Center, respectively. The GHG mitigation measures are summarized in **Table 5**.

²⁴ See State-certified EIR, Final Additional Environmental Analysis, Appendix 1; Final Actions and Supplemental Findings of the California Department of Fish and Wildlife for the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan, June 14, 2017, Section II.

Table 5. Application of Net Zero Newhall Mitigation Framework to Modified Project		
Mitigation Measure	Mitigation Measure Description	Applies to Modified Project?
MM 2-1	Residential Zero Net Energy	Yes
MM 2-2	Commercial Zero Net Energy	Yes
MM 2-3	Swimming Pool Heating	Yes
MM 2-4	Residential EV Chargers and Vehicle Subsidy	Yes
MM 2-5	Commercial Development Area EV Chargers	Yes
MM 2-6	Transportation Demand Management Plan	Yes
MM 2-7	Traffic Signal Synchronization	Yes
MM 2-8	Electric School Bus Program	Yes
MM 2-9	Electric Transit Bus Subsidy	Yes
MM 2-10	GHG Reduction Plan – Construction/Vegetation	Yes
MM 2-11	Building Retrofit Program	Yes
MM 2-12	Off-Site EV Chargers	Yes
MM 2-13	GHG Reduction Plan – Operations	Yes

As shown in **Table 5**, the mitigation measures will all apply to the Modified Project and address the categories of GHG emissions for the Modified Project (i.e., building energy, area and mobile sources). These mitigation measures reduce the onsite GHG emissions as feasible, and MM 2-10 and 2-13 ensure that remaining Project emissions are addressed such that there is no net increase of GHG emissions from the Modified Project. Thus, construction and operational GHG emissions from the Modified Project will not cause a net increase in GHG after mitigation and will not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.²⁵ Therefore, the Modified Project will not result in a new significant environmental effect relative to Threshold 1 or Threshold 2.

²⁵ The State-certified EIR concluded that relevant plans for the reduction of greenhouse gases establish non-zero targets (i.e., some level of positive net emissions above existing conditions for land developments to accommodate planned growth). By achieving net zero emissions, the 2017 Approved Project would not conflict with any relevant plan, policy or regulation. The Project modifications would not affect these conclusions.

4. ENERGY IMPACTS

4.1 Background

The Modified Project would consume energy in the form of gasoline and diesel fuel, electricity, and natural gas and will produce energy in the form of electricity from on-site solar panels. Consistent with the GHG discussion above, the minor modifications in land use type, distribution, and floor area may result in slight changes in the amount of energy associated with building operations and transportation compared to that identified in the State-certified EIR. As the construction intensity and duration are not expected to change, the Project modifications are not expected to result in changes in energy consumed during construction.

The State-certified EIR studied impacts to global climate change and, due to the relationship between energy consumption and the release of GHG emissions, considered the energy implications of development within the Entrada and VCC planning areas. The State-certified EIR included numerous mitigation measures to increase the energy efficiency of development and thereby reduce energy demand, including Mitigation Measures 2-1 and 2-2 (requiring Zero Net Energy design for residential and non-residential development areas), 2-3 (requiring solar water heating or equivalent technology for swimming pools at private recreation centers), 2-4 and 2-5 (requiring extensive charging infrastructure for zero emission vehicles throughout on-site residential and non-residential development areas), 2-6 through 2-9 (requiring transportation-related commitments, such as implementation of a Transportation Demand Management Plan, traffic signal synchronization, and funding to convert bus fleets to zero emissions technology), 2-11 (requiring implementation of an off-site building retrofit program), and 2-12 (requiring charging infrastructure for zero emission vehicles at off-site locations). As discussed below, the mitigation framework avoids the wasteful, inefficient or unnecessary consumption of energy resources by reducing energy consumption in the built environment via exceedance of code-based standards; relying on renewable energy sources; and encouraging and incentivizing the use of zero emission vehicles.

4.2 Analysis

This section evaluates the significance of the Modified Project's energy by reference to the following questions from Section VI, Energy, of Appendix G of the CEQA Guidelines:²⁶

Threshold 1. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Threshold 2. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Part I of Appendix F of the CEQA Guidelines states as follows: "The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include: decreasing overall per capita energy consumption, decreasing reliance on fossil fuels such as coal, natural gas and oil, and increasing reliance on renewable energy resources." Appendix F of the CEQA Guidelines also states that an EIR should include a discussion of the potential

²⁶ CEQA Appendix G: Environmental Checklist Form. Available at: <http://resources.ca.gov/ceqa/docs/ab52/final-approved-appendix-G.pdf>. Accessed: May 2019.

energy impacts of a project, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy.

For purposes of this analysis, impacts to energy resources will be considered significant if the Modified Project would result in the wasteful, inefficient or unnecessary consumption of fuel or energy, and conversely if the Modified Project would not incorporate renewable energy or energy efficiency measures into building design, equipment use, transportation or other project features. To determine whether the Project modifications would result in the wasteful, inefficient or unnecessary consumption of fuel or energy, and conversely whether the Project modifications would fail to incorporate renewable energy or energy efficiency measures into building design, equipment use, transportation or other project features, reference was made to Appendix F of the CEQA Guidelines, which identifies six categories of potential energy-related environmental impacts:

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate the energy intensiveness of materials may be discussed.
2. The effects of the project on local and regional energy supplies and on requirements for additional capacity.
3. The effects of the project on peak and base period demands for electricity and other forms of energy.
4. The degree to which the project complies with existing energy standards.
5. The effects of the project on energy resources.
6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

The following sections assess the significance of the Modified Project's energy demand for purposes of CEQA.

4.3 Construction

Construction activities consume energy in the form of diesel and gasoline fuel for on-road vehicles and off-road construction equipment, and electricity for construction equipment and water supply; all of these activities generate GHG emissions. Accordingly, fuel use and GHG emissions can be calculated from construction equipment assumptions using standard modeling software (e.g., CalEEMod®). For example, an increase in equipment use or intensity would increase fuel use, with a corresponding increase in GHG emissions. The State-certified EIR disclosed the unmitigated total amounts of on-road and off-road construction equipment and vehicle use for Entrada South and Valencia Commerce Center. As described in more detail in the GHG discussion above, construction emissions for the Modified Project would not increase compared to construction emissions reported in the State-certified EIR because the Modified Project would involve the same types and number of construction equipment use as compared to the State-certified EIR's analysis of the 2017 Approved Project. Likewise, as discussed below, the Modified Project would not increase construction energy use as compared to the State-certified EIR.

Project construction requires use of on-road trucks for hauling and vendor deliveries, and off-road equipment such as excavators, cranes, forklifts, and pavers. The Modified Project would comply with State and local requirements designed to minimize idling and associated

emissions, which also minimize use of fuel. Specifically, idling of commercial vehicles and off-road equipment would be limited to five minutes in accordance with the Commercial Motor Vehicle Idling Regulation and the Off-Road Regulation, and the trucks used would be compliant with the requirements of the Tractor-Trailer Greenhouse Gas Regulation. Furthermore, mitigation measure AQ-2 in the State-certified EIR prohibits truck idling in excess of five minutes.

For Entrada South, the Modified Project's footprint for horizontal construction (e.g., site preparation, grading, demolition, and utilities installation) would remain consistent. Therefore, the construction energy use associated with those sub-phases of construction is not anticipated to increase under the Modified Project as compared to the 2017 Approved Project. Furthermore, while the Modified Project would result in a change in land use sub-types compared to what was assumed in the State-certified EIR, the overall square footage of development would be approximately the same under the Modified Project and the amount of vertical construction evaluated in the State-certified EIR was conservatively represented assuming the maximum year of off-road equipment would be used in all construction years for each construction phase, as described further above. Thus, the construction energy use for vertical construction also is not expected to increase under the Modified Project as compared to the 2017 Approved Project.

For VCC, the Modified Project will not change the Project footprint, proposed land uses, nor the total building square footage compared to what was assumed in the State-certified EIR. Therefore, the construction energy use from all aspects of VCC are not anticipated to change.

As discussed above, the State-certified EIR included conservative assumptions about the mix of construction equipment that would be used during construction. Actual average construction equipment use is expected to be lower than the peak construction equipment use considered in the State-certified EIR.

Overall, construction energy use for the Modified Project is not expected to increase compared to the 2017 Approved Project. Energy use and fuel efficiency for construction is expected to improve over time as older equipment is replaced and repowered; therefore, fuel and energy efficiency for the Modified Project is expected to be the same or better than the efficiencies assumed in the State-certified EIR. Additionally, there are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities, or equipment that would not conform to current emissions standards (and related fuel efficiencies).

4.4 Operations

Project operations would require energy in the forms of electricity, natural gas, gasoline, and diesel. The GHG emissions analysis in the State-certified EIR disclosed the unmitigated total amounts of electricity and natural gas use and mobile vehicle use for Entrada South and Valencia Commerce Center. **Table 6** shows the estimated changes in energy consumption due to the Modified Project for Entrada South, while **Table 7** shows the estimated changes in energy consumption due to modeling changes for VCC.

Table 6. Approximate Unmitigated Energy Use Changes within Entrada South

Category		Residential	Commercial	Net Unmitigated Energy Use Modified Project Total
Number of Units ^a	(DU or SF)	-151	+280,000	-
Electricity ^b	(MWh/yr)	-649	+3,221	+2,572
Natural Gas ^b	(MMBTU/yr)	-240	+720	+480
Mobile Fuel ^c	(TGAL Diesel/yr)	-19	+136	+117
	(TGAL Gasoline/yr)	-92	+663	+571
	(Electricity MWh/yr)	-29	+207	+178

Notes:

^a The State-certified EIR modeling included a mix of single family homes and condo/townhouses; however, this analysis conservatively assumes the change in dwelling units is all of the condo/townhouse subtype. This is conservative because single family homes as modeled have higher building energy and mobile emissions than condo/townhouses. Represents the change in energy use due to changes in how the land uses for ES are modeled compared to the modeling assumptions in the State-certified EIR.

^b Electricity and natural gas use represent the per-unit rates for buildings constructed to 2019 Title 24 Standards, based on ConSol's Building Energy Analyses for Newhall Ranch, as incorporated into the State-certified EIR. These rates are multiplied by the number of units to estimate total energy use. This does not include the benefits of the solar photovoltaic electricity production required for the Zero Net Energy mitigation commitment.

^c Mobile fuel use is estimated based on VMT data for the Modified Project and mobile fleet mix projections from EMFAC2017. This data does not include the benefits of the GHG mitigation measures (which would reduce VMT, reduce gasoline and diesel use, and increase electricity use). The percent of miles and fuel economy traveled by gasoline, diesel, and electric vehicles is from EMFAC2017 for calendar year 2030, Los Angeles South Coast, aggregated over all speeds and vehicle types. A negligible amount of natural gas is used (0.2% of VMT), which is not shown here. Fuel economy of electric vehicles is consistent with the State-certified AEA.

Abbreviations:

DU - dwelling unit	SF - square foot
MMBTU - million BTU	VMT - vehicle miles traveled
MWh - megawatt-hour	yr - year
TGAL - thousand gallons	

Table 7. Approximate Unmitigated Energy Use Changes within Valencia Commerce Center

Category		Net Unmitigated Energy Use Changes Total
Electricity	(MWh/yr)	0
Natural Gas	(MMBTU/yr)	0
Mobile Fuel	(TGAL Diesel/yr)	0
	(TGAL Gasoline/yr)	0
	(Electricity MWh/yr)	0

Notes:

The Valencia Commerce Center Modified Project does not have any change in energy use.

Abbreviations:

MMBTU - million BTU	VMT - vehicle miles traveled
MWh - megawatt-hour	yr – year
TGAL – thousand gallons	

The changes in energy consumption shown in **Tables 6** and **7** are not expected to cause the Modified Project to have any additional impact on the local or regional energy supplies or require additional capacity to be constructed; have a new significant impact on the peak and base period demands for electricity or other forms of energy; or have a substantial effect on statewide or regional energy resources compared to the Project approved in the State-certified EIR. **Tables 8** and **9** show the Modified Project's operational energy consumption by fuel type out of the total consumption in Los Angeles County and California. As shown in **Tables 8** and **9**, this consumption is a small portion of the total energy use and is; therefore, unlikely to have a new significant impact on peak or base period demands for energy.

Table 8. Entrada South Modified Project Energy Use in Context		
Energy Resource	Unmitigated Modified Project's Contribution^a	
	Los Angeles County	California
Electricity ^b	0.004%	0.001%
Natural Gas ^c	0.0002%	0.00004%
Gasoline ^d	0.02%	0.005%
Diesel ^d	0.02%	0.003%
Notes: <p>a. The Modified Project's contribution is calculated by dividing the energy use from Table 6 by the total consumption in Los Angeles County or California, respectively. This does not incorporate the co-benefits of the GHG mitigation measures that will reduce energy use.</p> <p>b. Electricity data is obtained for 2019 from the California Energy Commission (CEC). Available at: http://www.ecdms.energy.ca.gov/elecbycounty.aspx. Accessed: April, 2021. Statewide total energy use will likely increase by Project buildout, so these percentages would decrease if compared to 2030 projections rather than historical data.</p> <p>c. Natural gas data is obtained for 2019 from the CEC. Available at: http://www.ecdms.energy.ca.gov/gasbycounty.aspx. Accessed: April, 2021. Statewide total energy use will likely increase by Project buildout, so these percentages would decrease if compared to 2030 projections rather than historical data.</p> <p>d. Diesel and gasoline projections are based on EMFAC2017 projections for buildout year (2030) for Los Angeles County and California. Available at: https://www.arb.ca.gov/emfac/2017/. This is on-road fuel consumption only; these percentages would decrease if fuel use for off-road or stationary sources was included.</p>		

Table 9. Valencia Commerce Center Modified Project Energy Use in Context		
Energy Resource	Unmitigated Modified Project's Contribution	
	Los Angeles County	California
Electricity	0%	0%
Natural Gas	0%	0%
Gasoline	0%	0%
Diesel	0%	0%
Notes: The Valencia Commerce Center Modified Project does not have any change in energy use.		

Moreover, the GHG mitigation measures designed to reduce operational energy usage will continue to apply to the Modified Project. As described previously, the State-certified EIR included a GHG mitigation framework to reduce construction and operational GHG emissions to zero. These mitigation measures incorporate renewable energy and energy efficiency measures into building design, equipment use, transportation and other project features. The Modified Project will continue to follow all applicable mitigation measures for the Modified Project. Additionally, the Modified Project will be constructed in compliance with California's Building Energy Efficiency Standards and Green Building Standards; and will implement transportation demand management strategies to reduce vehicle miles traveled and mobile fuel use. The Modified Project will continue to adhere to State, regional, and local standards designed to ensure that buildings employ strict energy efficiency techniques and deploy transportation improvement initiatives such as improved vehicle efficiency and zero emission technologies, as described previously.

Mitigation Measures 2-1 and 2-2 to achieve Zero Net Energy for all residential and non-residential buildings exceed the current (2019) Title 24, Part 6, Building Energy Efficiency Standards requirements and will continue to apply to the modified land use mix. At the time the State-certified EIR was certified, the applicable Title 24 Standards were from 2016. However, MM 2-1 and 2-2 already exceeded the 2019 Title 24 requirements. Therefore, the Modified Project would comply with and continue to exceed existing energy standards. The Zero Net Energy requirements will result in the production of renewable electricity from solar panels, which would assist the State in decreasing reliance on fossil fuels such as coal, natural gas and oil, and increasing reliance on renewable energy resources. In addition, since the certification of State-certified EIR in 2017, statewide regulatory requirements for renewable electricity production have increased due to the passage of SB 100. Any electricity the Project receives from the electricity grid will contain a higher proportion of renewables than previously analyzed.

The Modified Project would implement efficient transportation alternatives to reduce its transportation energy use requirements through compliance with Mitigation Measures 2-4 through 2-9 and 2-11, as described above. While the vehicle trip generation data may change with the Project modifications, these programs will continue to apply and ensure the Modified Project uses efficient transportation alternatives.

Overall, these programs and mitigation measures will ensure that the Modified Project will not create wasteful consumption of energy and will not obstruct any plans for renewable energy or energy efficiency.

4.5 Summary

The Modified Project will not have a substantial impact on the local or regional energy supplies or require additional capacity to be constructed. Furthermore, the Modified Project adequately incorporates energy efficiency measures into building design that exceed state mandates and require buildings to be designed to Zero Net Energy standards and achieve reductions in vehicle use while encouraging electric vehicle use.

The Modified Project continues to incorporate the mitigation measures required of the 2017 Approved Project that make the project a leading example of sustainable, master-planned development for energy usage and GHG emissions. As discussed above, CDFW found that the 2017 Approved Project will design and construct residential development, commercial development, private recreation centers, and public facilities to achieve Zero Net Energy standards, as defined by the California Energy Commission, which advances California policy goals of increasing the energy efficiency of homes and commercial buildings. CDFW also found that the 2017 Approved Project will install an electric vehicle charging station at every residence, as well as thousands more electric vehicle charging stations in commercial areas within the project site and off-site throughout Los Angeles County, provide subsidies for the purchase of zero emission vehicles to Project residents, and this suite of mitigation commitments is expected to make the 2017 Approved Project a model community for electric vehicle ownership and increase the electric vehicle adoption rate within the Santa Clarita area and Los Angeles County, advancing State, regional and local goals to reduce emissions through an increased use of electric vehicles.

Moreover, the 2017 Approved Project was highlighted in CARB's 2017 Climate Change Scoping Plan, the 2017 Approved Project serves as one of "[s]everal recent examples of sustainable land use development projects in California [that] have demonstrated that it is feasible to design projects that achieve zero net additional GHG emissions."

Overall, the Modified Project continues to achieve the goal of conserving energy by decreasing reliance on fossil fuels such as coal, natural gas and oil, and increasing reliance on renewable energy resources. Thus, based on the above analysis of the factors identified in CEQA Guidelines Appendix F, the Modified Project will not result in a new significant environmental effect related to the wasteful, inefficient, or unnecessary consumption of fuel or energy, and will not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

APPENDIX A

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1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Office Park	365.00	1000sqft	8.38	365,000.00	0
Elementary School	750.00	Student	9.40	62,702.53	0
City Park	5.00	Acre	5.00	217,800.00	0
Health Club	2.50	1000sqft	0.06	2,500.00	0
Condo/Townhouse	1,574.00	Dwelling Unit	98.38	1,574,000.00	4958
Regional Shopping Center	365.00	1000sqft	8.38	365,000.00	0

1.2 Other Project Characteristics

Urbanization	Rural	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	9			Operational Year	2030
Utility Company	Southern California Edison				
CO2 Intensity (lb/MW hr)	310.59	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

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Project Characteristics - CO2 intensity factor based on 60% RPS in 2030

Land Use - Site Specific Landuse

Off-road Equipment - Constructional Emissions will be calculated separately

Off-road Equipment - Constructional Emissions will be calculated separately

Off-road Equipment - Constructional Emissions will be calculated separately

Off-road Equipment - Constructional Emissions will be calculated separately

Off-road Equipment - Constructional Emissions will be calculated separately

Off-road Equipment - Constructional Emissions will be calculated separately

Trips and VMT - Constructional Emissions will be calculated separately

Grading -

Vehicle Trips - Site Specification- Traffic Data

Road Dust -

Consumer Products - updated 2017 VOC inventory from CARB and population estimates based on the CA DOF demographic projections were used to estimate a statewide VOC EF for 2017

Area Coating - Incorporates updates to SCAQMD Rule 1113

Energy Use - Site Specific- Energy Use

Water And Wastewater - Site Specific- Wate & Waste Water

Solid Waste - Site Specific_Solid Waste

Land Use Change - Site Specific_Vegetation

Sequestration - Site Specific_Number of New Trees

Waste Mitigation -

Operational Off-Road Equipment -

Table Name	Column Name	Default Value	New Value
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tblArchitecturalCoating	ConstArea_Nonresidential_Interior	1,192,804.00	0.00
tblArchitecturalCoating	ConstArea_Residential_Exterior	1,062,450.00	0.00
tblArchitecturalCoating	ConstArea_Residential_Interior	3,187,350.00	0.00

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tblAreaCoating	Area_EF_Nonresidential_Exterior	100	50
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tblAreaCoating	Area_EF_Parking	100	50
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tblConstructionPhase	NumDays	310.00	0.00
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tblConstructionPhase	NumDays	220.00	0.00
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tblEnergyUse	T24E	1.74	5.41

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tblEnergyUse	T24E	2.25	8.82
tblEnergyUse	T24E	5.62	12.85
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tblEnergyUse	T24NG	1.15	1.36
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tblFireplaces	NumberNoFireplace	157.40	1,416.60
tblFireplaces	NumberWood	78.70	0.00
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tblFleetMix	LDT1	0.04	0.07
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tblOffRoadEquipment	UsageHours	8.00	0.00
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tblVehicleEF	HHD	0.10	0.09
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tblVehicleEF	HHD	0.06	2.0000e-006
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tblVehicleEF	HHD	1.10	0.53
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tblVehicleEF	HHD	0.04	0.04
tblVehicleEF	HHD	5.8330e-003	0.02
tblVehicleEF	HHD	1.1900e-004	1.0000e-006
tblVehicleEF	HHD	5.0110e-003	2.6610e-003
tblVehicleEF	HHD	0.03	0.03
tblVehicleEF	HHD	8.8520e-003	8.9040e-003
tblVehicleEF	HHD	5.5800e-003	0.02
tblVehicleEF	HHD	1.0900e-004	1.0000e-006
tblVehicleEF	HHD	9.7000e-005	2.0000e-006
tblVehicleEF	HHD	4.3810e-003	9.1000e-005
tblVehicleEF	HHD	0.40	0.41
tblVehicleEF	HHD	7.7000e-005	2.0000e-006
tblVehicleEF	HHD	0.09	0.02
tblVehicleEF	HHD	3.9200e-004	3.7000e-005
tblVehicleEF	HHD	0.06	2.0000e-006
tblVehicleEF	HHD	0.04	9.3500e-003
tblVehicleEF	HHD	0.01	0.01

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tblVehicleEF	HHD	1.7000e-004	1.0000e-006
tblVehicleEF	HHD	9.7000e-005	2.0000e-006
tblVehicleEF	HHD	4.3810e-003	9.1000e-005
tblVehicleEF	HHD	0.48	0.47
tblVehicleEF	HHD	7.7000e-005	2.0000e-006
tblVehicleEF	HHD	0.20	0.11
tblVehicleEF	HHD	3.9200e-004	3.7000e-005
tblVehicleEF	HHD	0.07	3.0000e-006
tblVehicleEF	LDA	2.7530e-003	1.3190e-003
tblVehicleEF	LDA	2.1570e-003	0.03
tblVehicleEF	LDA	0.41	0.48
tblVehicleEF	LDA	0.61	1.57
tblVehicleEF	LDA	206.71	216.64
tblVehicleEF	LDA	42.61	42.25
tblVehicleEF	LDA	0.03	0.02
tblVehicleEF	LDA	0.03	0.12
tblVehicleEF	LDA	1.4730e-003	1.1510e-003
tblVehicleEF	LDA	1.7910e-003	1.2570e-003
tblVehicleEF	LDA	1.3550e-003	1.0590e-003
tblVehicleEF	LDA	1.6460e-003	1.1560e-003
tblVehicleEF	LDA	0.02	0.03
tblVehicleEF	LDA	0.06	0.07
tblVehicleEF	LDA	0.02	0.03
tblVehicleEF	LDA	6.9100e-003	4.5630e-003
tblVehicleEF	LDA	0.03	0.02
tblVehicleEF	LDA	0.03	0.12
tblVehicleEF	LDA	2.0690e-003	2.1430e-003

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tblVehicleEF	LDA	4.3600e-004	4.1800e-004
tblVehicleEF	LDA	0.02	0.03
tblVehicleEF	LDA	0.06	0.07
tblVehicleEF	LDA	0.02	0.03
tblVehicleEF	LDA	0.01	6.6260e-003
tblVehicleEF	LDA	0.03	0.02
tblVehicleEF	LDA	0.03	0.13
tblVehicleEF	LDA	2.9310e-003	1.4120e-003
tblVehicleEF	LDA	1.9230e-003	0.03
tblVehicleEF	LDA	0.45	0.52
tblVehicleEF	LDA	0.52	1.34
tblVehicleEF	LDA	216.34	226.07
tblVehicleEF	LDA	42.61	41.85
tblVehicleEF	LDA	0.03	0.02
tblVehicleEF	LDA	0.03	0.11
tblVehicleEF	LDA	1.4730e-003	1.1510e-003
tblVehicleEF	LDA	1.7910e-003	1.2570e-003
tblVehicleEF	LDA	1.3550e-003	1.0590e-003
tblVehicleEF	LDA	1.6460e-003	1.1560e-003
tblVehicleEF	LDA	0.04	0.05
tblVehicleEF	LDA	0.07	0.07
tblVehicleEF	LDA	0.03	0.04
tblVehicleEF	LDA	7.3500e-003	4.8380e-003
tblVehicleEF	LDA	0.03	0.02
tblVehicleEF	LDA	0.03	0.10
tblVehicleEF	LDA	2.1660e-003	2.2360e-003
tblVehicleEF	LDA	4.3400e-004	4.1400e-004

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tblVehicleEF	LDA	0.04	0.05
tblVehicleEF	LDA	0.07	0.07
tblVehicleEF	LDA	0.03	0.04
tblVehicleEF	LDA	0.01	7.0270e-003
tblVehicleEF	LDA	0.03	0.02
tblVehicleEF	LDA	0.03	0.11
tblVehicleEF	LDA	2.6960e-003	1.2900e-003
tblVehicleEF	LDA	2.2070e-003	0.03
tblVehicleEF	LDA	0.39	0.46
tblVehicleEF	LDA	0.63	1.62
tblVehicleEF	LDA	203.19	213.15
tblVehicleEF	LDA	42.61	42.34
tblVehicleEF	LDA	0.03	0.02
tblVehicleEF	LDA	0.03	0.12
tblVehicleEF	LDA	1.4730e-003	1.1510e-003
tblVehicleEF	LDA	1.7910e-003	1.2570e-003
tblVehicleEF	LDA	1.3550e-003	1.0590e-003
tblVehicleEF	LDA	1.6460e-003	1.1560e-003
tblVehicleEF	LDA	0.02	0.03
tblVehicleEF	LDA	0.07	0.07
tblVehicleEF	LDA	0.02	0.03
tblVehicleEF	LDA	6.7690e-003	4.4730e-003
tblVehicleEF	LDA	0.04	0.03
tblVehicleEF	LDA	0.03	0.12
tblVehicleEF	LDA	2.0340e-003	2.1080e-003
tblVehicleEF	LDA	4.3600e-004	4.1900e-004
tblVehicleEF	LDA	0.02	0.03

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tblVehicleEF	LDA	0.07	0.07
tblVehicleEF	LDA	0.02	0.03
tblVehicleEF	LDA	9.8420e-003	6.4940e-003
tblVehicleEF	LDA	0.04	0.03
tblVehicleEF	LDA	0.03	0.13
tblVehicleEF	LDT1	6.9520e-003	2.8350e-003
tblVehicleEF	LDT1	5.6080e-003	0.04
tblVehicleEF	LDT1	0.84	0.71
tblVehicleEF	LDT1	1.27	1.69
tblVehicleEF	LDT1	271.30	260.95
tblVehicleEF	LDT1	55.18	51.16
tblVehicleEF	LDT1	0.07	0.04
tblVehicleEF	LDT1	0.07	0.15
tblVehicleEF	LDT1	2.1890e-003	1.4610e-003
tblVehicleEF	LDT1	2.3480e-003	1.5240e-003
tblVehicleEF	LDT1	2.0130e-003	1.3440e-003
tblVehicleEF	LDT1	2.1590e-003	1.4010e-003
tblVehicleEF	LDT1	0.07	0.06
tblVehicleEF	LDT1	0.15	0.11
tblVehicleEF	LDT1	0.06	0.06
tblVehicleEF	LDT1	0.02	0.01
tblVehicleEF	LDT1	0.11	0.05
tblVehicleEF	LDT1	0.08	0.16
tblVehicleEF	LDT1	2.7220e-003	2.5820e-003
tblVehicleEF	LDT1	5.7300e-004	5.0600e-004
tblVehicleEF	LDT1	0.07	0.06
tblVehicleEF	LDT1	0.15	0.11

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tblVehicleEF	LDT1	0.06	0.06
tblVehicleEF	LDT1	0.03	0.02
tblVehicleEF	LDT1	0.11	0.05
tblVehicleEF	LDT1	0.08	0.17
tblVehicleEF	LDT1	7.3580e-003	3.0150e-003
tblVehicleEF	LDT1	4.9870e-003	0.03
tblVehicleEF	LDT1	0.92	0.78
tblVehicleEF	LDT1	1.08	1.45
tblVehicleEF	LDT1	283.27	270.68
tblVehicleEF	LDT1	55.18	50.71
tblVehicleEF	LDT1	0.06	0.04
tblVehicleEF	LDT1	0.06	0.14
tblVehicleEF	LDT1	2.1890e-003	1.4610e-003
tblVehicleEF	LDT1	2.3480e-003	1.5240e-003
tblVehicleEF	LDT1	2.0130e-003	1.3440e-003
tblVehicleEF	LDT1	2.1590e-003	1.4010e-003
tblVehicleEF	LDT1	0.11	0.10
tblVehicleEF	LDT1	0.16	0.11
tblVehicleEF	LDT1	0.09	0.08
tblVehicleEF	LDT1	0.02	0.01
tblVehicleEF	LDT1	0.10	0.05
tblVehicleEF	LDT1	0.07	0.14
tblVehicleEF	LDT1	2.8430e-003	2.6790e-003
tblVehicleEF	LDT1	5.7000e-004	5.0200e-004
tblVehicleEF	LDT1	0.11	0.10
tblVehicleEF	LDT1	0.16	0.11
tblVehicleEF	LDT1	0.09	0.08

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tblVehicleEF	LDT1	0.03	0.02
tblVehicleEF	LDT1	0.10	0.05
tblVehicleEF	LDT1	0.07	0.16
tblVehicleEF	LDT1	6.8200e-003	2.7790e-003
tblVehicleEF	LDT1	5.7380e-003	0.04
tblVehicleEF	LDT1	0.81	0.69
tblVehicleEF	LDT1	1.31	1.75
tblVehicleEF	LDT1	266.90	257.36
tblVehicleEF	LDT1	55.18	51.26
tblVehicleEF	LDT1	0.07	0.04
tblVehicleEF	LDT1	0.07	0.15
tblVehicleEF	LDT1	2.1890e-003	1.4610e-003
tblVehicleEF	LDT1	2.3480e-003	1.5240e-003
tblVehicleEF	LDT1	2.0130e-003	1.3440e-003
tblVehicleEF	LDT1	2.1590e-003	1.4010e-003
tblVehicleEF	LDT1	0.07	0.06
tblVehicleEF	LDT1	0.17	0.12
tblVehicleEF	LDT1	0.06	0.06
tblVehicleEF	LDT1	0.02	0.01
tblVehicleEF	LDT1	0.13	0.06
tblVehicleEF	LDT1	0.08	0.16
tblVehicleEF	LDT1	2.6780e-003	2.5470e-003
tblVehicleEF	LDT1	5.7400e-004	5.0700e-004
tblVehicleEF	LDT1	0.07	0.06
tblVehicleEF	LDT1	0.17	0.12
tblVehicleEF	LDT1	0.06	0.06
tblVehicleEF	LDT1	0.02	0.02

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tblVehicleEF	LDT1	0.13	0.06
tblVehicleEF	LDT1	0.08	0.18
tblVehicleEF	LDT2	4.0800e-003	2.3500e-003
tblVehicleEF	LDT2	2.8850e-003	0.04
tblVehicleEF	LDT2	0.58	0.65
tblVehicleEF	LDT2	0.80	2.05
tblVehicleEF	LDT2	298.13	264.92
tblVehicleEF	LDT2	60.47	52.12
tblVehicleEF	LDT2	0.04	0.04
tblVehicleEF	LDT2	0.05	0.15
tblVehicleEF	LDT2	1.7210e-003	1.2920e-003
tblVehicleEF	LDT2	2.0290e-003	1.3260e-003
tblVehicleEF	LDT2	1.5830e-003	1.1900e-003
tblVehicleEF	LDT2	1.8660e-003	1.2190e-003
tblVehicleEF	LDT2	0.03	0.05
tblVehicleEF	LDT2	0.06	0.08
tblVehicleEF	LDT2	0.03	0.06
tblVehicleEF	LDT2	0.01	9.0370e-003
tblVehicleEF	LDT2	0.05	0.04
tblVehicleEF	LDT2	0.04	0.17
tblVehicleEF	LDT2	2.9850e-003	2.6210e-003
tblVehicleEF	LDT2	6.1800e-004	5.1600e-004
tblVehicleEF	LDT2	0.03	0.05
tblVehicleEF	LDT2	0.06	0.08
tblVehicleEF	LDT2	0.03	0.06
tblVehicleEF	LDT2	0.01	0.01
tblVehicleEF	LDT2	0.05	0.04

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tblVehicleEF	LDT2	0.04	0.18
tblVehicleEF	LDT2	4.3330e-003	2.5070e-003
tblVehicleEF	LDT2	2.5890e-003	0.03
tblVehicleEF	LDT2	0.64	0.71
tblVehicleEF	LDT2	0.70	1.75
tblVehicleEF	LDT2	311.45	273.88
tblVehicleEF	LDT2	60.47	51.59
tblVehicleEF	LDT2	0.04	0.03
tblVehicleEF	LDT2	0.04	0.14
tblVehicleEF	LDT2	1.7210e-003	1.2920e-003
tblVehicleEF	LDT2	2.0290e-003	1.3260e-003
tblVehicleEF	LDT2	1.5830e-003	1.1900e-003
tblVehicleEF	LDT2	1.8660e-003	1.2190e-003
tblVehicleEF	LDT2	0.05	0.08
tblVehicleEF	LDT2	0.07	0.08
tblVehicleEF	LDT2	0.05	0.08
tblVehicleEF	LDT2	0.01	9.5610e-003
tblVehicleEF	LDT2	0.05	0.04
tblVehicleEF	LDT2	0.03	0.15
tblVehicleEF	LDT2	3.1190e-003	2.7090e-003
tblVehicleEF	LDT2	6.1600e-004	5.1100e-004
tblVehicleEF	LDT2	0.05	0.08
tblVehicleEF	LDT2	0.07	0.08
tblVehicleEF	LDT2	0.05	0.08
tblVehicleEF	LDT2	0.02	0.01
tblVehicleEF	LDT2	0.05	0.04
tblVehicleEF	LDT2	0.04	0.16

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tblVehicleEF	LDT2	3.9970e-003	2.3020e-003
tblVehicleEF	LDT2	2.9490e-003	0.04
tblVehicleEF	LDT2	0.56	0.62
tblVehicleEF	LDT2	0.82	2.12
tblVehicleEF	LDT2	293.23	261.61
tblVehicleEF	LDT2	60.47	52.25
tblVehicleEF	LDT2	0.04	0.04
tblVehicleEF	LDT2	0.05	0.16
tblVehicleEF	LDT2	1.7210e-003	1.2920e-003
tblVehicleEF	LDT2	2.0290e-003	1.3260e-003
tblVehicleEF	LDT2	1.5830e-003	1.1900e-003
tblVehicleEF	LDT2	1.8660e-003	1.2190e-003
tblVehicleEF	LDT2	0.03	0.05
tblVehicleEF	LDT2	0.07	0.09
tblVehicleEF	LDT2	0.03	0.05
tblVehicleEF	LDT2	9.9350e-003	8.8640e-003
tblVehicleEF	LDT2	0.06	0.05
tblVehicleEF	LDT2	0.04	0.17
tblVehicleEF	LDT2	2.9360e-003	2.5880e-003
tblVehicleEF	LDT2	6.1800e-004	5.1700e-004
tblVehicleEF	LDT2	0.03	0.05
tblVehicleEF	LDT2	0.07	0.09
tblVehicleEF	LDT2	0.03	0.05
tblVehicleEF	LDT2	0.01	0.01
tblVehicleEF	LDT2	0.06	0.05
tblVehicleEF	LDT2	0.04	0.19
tblVehicleEF	LHD1	3.6730e-003	4.0860e-003

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tblVehicleEF	LHD1	4.1110e-003	2.4080e-003
tblVehicleEF	LHD1	9.2280e-003	8.3620e-003
tblVehicleEF	LHD1	0.13	0.17
tblVehicleEF	LHD1	0.34	0.26
tblVehicleEF	LHD1	1.52	0.84
tblVehicleEF	LHD1	8.95	8.20
tblVehicleEF	LHD1	552.26	569.54
tblVehicleEF	LHD1	25.23	9.69
tblVehicleEF	LHD1	0.06	0.04
tblVehicleEF	LHD1	0.39	0.22
tblVehicleEF	LHD1	0.58	0.21
tblVehicleEF	LHD1	8.0100e-004	9.5600e-004
tblVehicleEF	LHD1	0.01	9.9890e-003
tblVehicleEF	LHD1	6.7350e-003	4.5990e-003
tblVehicleEF	LHD1	6.1300e-004	2.0100e-004
tblVehicleEF	LHD1	7.6600e-004	9.1500e-004
tblVehicleEF	LHD1	2.6310e-003	2.4970e-003
tblVehicleEF	LHD1	6.4250e-003	4.3760e-003
tblVehicleEF	LHD1	5.6300e-004	1.8500e-004
tblVehicleEF	LHD1	1.8240e-003	1.4360e-003
tblVehicleEF	LHD1	0.07	0.05
tblVehicleEF	LHD1	0.01	0.02
tblVehicleEF	LHD1	1.2120e-003	9.7400e-004
tblVehicleEF	LHD1	0.04	0.03
tblVehicleEF	LHD1	0.22	0.15
tblVehicleEF	LHD1	0.12	0.04
tblVehicleEF	LHD1	8.9000e-005	7.9000e-005

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tblVehicleEF	LHD1	5.3890e-003	5.5450e-003
tblVehicleEF	LHD1	2.8000e-004	9.6000e-005
tblVehicleEF	LHD1	1.8240e-003	1.4360e-003
tblVehicleEF	LHD1	0.07	0.05
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	1.2120e-003	9.7400e-004
tblVehicleEF	LHD1	0.05	0.03
tblVehicleEF	LHD1	0.22	0.15
tblVehicleEF	LHD1	0.14	0.04
tblVehicleEF	LHD1	3.6730e-003	4.0940e-003
tblVehicleEF	LHD1	4.1640e-003	2.4350e-003
tblVehicleEF	LHD1	8.8850e-003	8.0800e-003
tblVehicleEF	LHD1	0.13	0.17
tblVehicleEF	LHD1	0.34	0.26
tblVehicleEF	LHD1	1.45	0.80
tblVehicleEF	LHD1	8.95	8.20
tblVehicleEF	LHD1	552.26	569.55
tblVehicleEF	LHD1	25.23	9.63
tblVehicleEF	LHD1	0.06	0.04
tblVehicleEF	LHD1	0.36	0.21
tblVehicleEF	LHD1	0.56	0.20
tblVehicleEF	LHD1	8.0100e-004	9.5600e-004
tblVehicleEF	LHD1	0.01	9.9890e-003
tblVehicleEF	LHD1	6.7350e-003	4.5990e-003
tblVehicleEF	LHD1	6.1300e-004	2.0100e-004
tblVehicleEF	LHD1	7.6600e-004	9.1500e-004
tblVehicleEF	LHD1	2.6310e-003	2.4970e-003

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tblVehicleEF	LHD1	6.4250e-003	4.3760e-003
tblVehicleEF	LHD1	5.6300e-004	1.8500e-004
tblVehicleEF	LHD1	2.7190e-003	2.1120e-003
tblVehicleEF	LHD1	0.07	0.05
tblVehicleEF	LHD1	0.01	0.02
tblVehicleEF	LHD1	1.6740e-003	1.3280e-003
tblVehicleEF	LHD1	0.04	0.03
tblVehicleEF	LHD1	0.22	0.14
tblVehicleEF	LHD1	0.12	0.04
tblVehicleEF	LHD1	8.9000e-005	7.9000e-005
tblVehicleEF	LHD1	5.3890e-003	5.5460e-003
tblVehicleEF	LHD1	2.7900e-004	9.5000e-005
tblVehicleEF	LHD1	2.7190e-003	2.1120e-003
tblVehicleEF	LHD1	0.07	0.05
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	1.6740e-003	1.3280e-003
tblVehicleEF	LHD1	0.05	0.04
tblVehicleEF	LHD1	0.22	0.14
tblVehicleEF	LHD1	0.13	0.04
tblVehicleEF	LHD1	3.6730e-003	4.0840e-003
tblVehicleEF	LHD1	4.0970e-003	2.4000e-003
tblVehicleEF	LHD1	9.2960e-003	8.4240e-003
tblVehicleEF	LHD1	0.13	0.17
tblVehicleEF	LHD1	0.34	0.26
tblVehicleEF	LHD1	1.53	0.84
tblVehicleEF	LHD1	8.95	8.20
tblVehicleEF	LHD1	552.26	569.54

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tblVehicleEF	LHD1	25.23	9.70
tblVehicleEF	LHD1	0.06	0.04
tblVehicleEF	LHD1	0.38	0.21
tblVehicleEF	LHD1	0.59	0.21
tblVehicleEF	LHD1	8.0100e-004	9.5600e-004
tblVehicleEF	LHD1	0.01	9.9890e-003
tblVehicleEF	LHD1	6.7350e-003	4.5990e-003
tblVehicleEF	LHD1	6.1300e-004	2.0100e-004
tblVehicleEF	LHD1	7.6600e-004	9.1500e-004
tblVehicleEF	LHD1	2.6310e-003	2.4970e-003
tblVehicleEF	LHD1	6.4250e-003	4.3760e-003
tblVehicleEF	LHD1	5.6300e-004	1.8500e-004
tblVehicleEF	LHD1	1.8420e-003	1.4480e-003
tblVehicleEF	LHD1	0.08	0.06
tblVehicleEF	LHD1	0.01	0.02
tblVehicleEF	LHD1	1.1740e-003	9.4600e-004
tblVehicleEF	LHD1	0.04	0.03
tblVehicleEF	LHD1	0.24	0.16
tblVehicleEF	LHD1	0.13	0.04
tblVehicleEF	LHD1	8.9000e-005	7.9000e-005
tblVehicleEF	LHD1	5.3890e-003	5.5450e-003
tblVehicleEF	LHD1	2.8000e-004	9.6000e-005
tblVehicleEF	LHD1	1.8420e-003	1.4480e-003
tblVehicleEF	LHD1	0.08	0.06
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	1.1740e-003	9.4600e-004
tblVehicleEF	LHD1	0.05	0.03

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tblVehicleEF	LHD1	0.24	0.16
tblVehicleEF	LHD1	0.14	0.04
tblVehicleEF	LHD2	2.6590e-003	2.7710e-003
tblVehicleEF	LHD2	2.1660e-003	2.1950e-003
tblVehicleEF	LHD2	3.4320e-003	5.4400e-003
tblVehicleEF	LHD2	0.12	0.14
tblVehicleEF	LHD2	0.19	0.22
tblVehicleEF	LHD2	0.90	0.51
tblVehicleEF	LHD2	13.48	12.65
tblVehicleEF	LHD2	582.11	572.46
tblVehicleEF	LHD2	22.79	7.05
tblVehicleEF	LHD2	0.07	0.06
tblVehicleEF	LHD2	0.16	0.29
tblVehicleEF	LHD2	0.28	0.14
tblVehicleEF	LHD2	1.0110e-003	1.4290e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	6.4750e-003	9.3110e-003
tblVehicleEF	LHD2	3.8100e-004	1.1400e-004
tblVehicleEF	LHD2	9.6700e-004	1.3680e-003
tblVehicleEF	LHD2	2.7000e-003	2.6930e-003
tblVehicleEF	LHD2	6.1820e-003	8.8940e-003
tblVehicleEF	LHD2	3.5000e-004	1.0400e-004
tblVehicleEF	LHD2	6.1700e-004	8.1200e-004
tblVehicleEF	LHD2	0.02	0.03
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	4.6000e-004	5.8900e-004
tblVehicleEF	LHD2	0.03	0.04

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tblVehicleEF	LHD2	0.04	0.06
tblVehicleEF	LHD2	0.05	0.03
tblVehicleEF	LHD2	1.3100e-004	1.2100e-004
tblVehicleEF	LHD2	5.6580e-003	5.5250e-003
tblVehicleEF	LHD2	2.4300e-004	7.0000e-005
tblVehicleEF	LHD2	6.1700e-004	8.1200e-004
tblVehicleEF	LHD2	0.02	0.03
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	4.6000e-004	5.8900e-004
tblVehicleEF	LHD2	0.04	0.04
tblVehicleEF	LHD2	0.04	0.06
tblVehicleEF	LHD2	0.05	0.03
tblVehicleEF	LHD2	2.6590e-003	2.7770e-003
tblVehicleEF	LHD2	2.1810e-003	2.2080e-003
tblVehicleEF	LHD2	3.3530e-003	5.2580e-003
tblVehicleEF	LHD2	0.12	0.14
tblVehicleEF	LHD2	0.19	0.23
tblVehicleEF	LHD2	0.86	0.49
tblVehicleEF	LHD2	13.48	12.65
tblVehicleEF	LHD2	582.11	572.46
tblVehicleEF	LHD2	22.79	7.01
tblVehicleEF	LHD2	0.07	0.06
tblVehicleEF	LHD2	0.15	0.28
tblVehicleEF	LHD2	0.27	0.13
tblVehicleEF	LHD2	1.0110e-003	1.4290e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	6.4750e-003	9.3110e-003

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tblVehicleEF	LHD2	3.8100e-004	1.1400e-004
tblVehicleEF	LHD2	9.6700e-004	1.3680e-003
tblVehicleEF	LHD2	2.7000e-003	2.6930e-003
tblVehicleEF	LHD2	6.1820e-003	8.8940e-003
tblVehicleEF	LHD2	3.5000e-004	1.0400e-004
tblVehicleEF	LHD2	9.2000e-004	1.1960e-003
tblVehicleEF	LHD2	0.02	0.03
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	6.3200e-004	8.0200e-004
tblVehicleEF	LHD2	0.03	0.04
tblVehicleEF	LHD2	0.04	0.06
tblVehicleEF	LHD2	0.05	0.02
tblVehicleEF	LHD2	1.3100e-004	1.2100e-004
tblVehicleEF	LHD2	5.6590e-003	5.5250e-003
tblVehicleEF	LHD2	2.4200e-004	6.9000e-005
tblVehicleEF	LHD2	9.2000e-004	1.1960e-003
tblVehicleEF	LHD2	0.02	0.03
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	6.3200e-004	8.0200e-004
tblVehicleEF	LHD2	0.04	0.04
tblVehicleEF	LHD2	0.04	0.06
tblVehicleEF	LHD2	0.05	0.03
tblVehicleEF	LHD2	2.6590e-003	2.7700e-003
tblVehicleEF	LHD2	2.1620e-003	2.1910e-003
tblVehicleEF	LHD2	3.4490e-003	5.4800e-003
tblVehicleEF	LHD2	0.12	0.14
tblVehicleEF	LHD2	0.19	0.22

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tblVehicleEF	LHD2	0.91	0.52
tblVehicleEF	LHD2	13.48	12.65
tblVehicleEF	LHD2	582.11	572.46
tblVehicleEF	LHD2	22.79	7.05
tblVehicleEF	LHD2	0.07	0.06
tblVehicleEF	LHD2	0.16	0.29
tblVehicleEF	LHD2	0.28	0.14
tblVehicleEF	LHD2	1.0110e-003	1.4290e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	6.4750e-003	9.3110e-003
tblVehicleEF	LHD2	3.8100e-004	1.1400e-004
tblVehicleEF	LHD2	9.6700e-004	1.3680e-003
tblVehicleEF	LHD2	2.7000e-003	2.6930e-003
tblVehicleEF	LHD2	6.1820e-003	8.8940e-003
tblVehicleEF	LHD2	3.5000e-004	1.0400e-004
tblVehicleEF	LHD2	5.9800e-004	7.9300e-004
tblVehicleEF	LHD2	0.02	0.03
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	4.4100e-004	5.6400e-004
tblVehicleEF	LHD2	0.03	0.04
tblVehicleEF	LHD2	0.05	0.07
tblVehicleEF	LHD2	0.05	0.03
tblVehicleEF	LHD2	1.3100e-004	1.2100e-004
tblVehicleEF	LHD2	5.6580e-003	5.5250e-003
tblVehicleEF	LHD2	2.4300e-004	7.0000e-005
tblVehicleEF	LHD2	5.9800e-004	7.9300e-004
tblVehicleEF	LHD2	0.02	0.03

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tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	4.4100e-004	5.6400e-004
tblVehicleEF	LHD2	0.04	0.04
tblVehicleEF	LHD2	0.05	0.07
tblVehicleEF	LHD2	0.05	0.03
tblVehicleEF	MCY	0.56	0.38
tblVehicleEF	MCY	0.15	0.23
tblVehicleEF	MCY	17.99	18.05
tblVehicleEF	MCY	9.80	8.68
tblVehicleEF	MCY	192.02	224.73
tblVehicleEF	MCY	42.23	57.60
tblVehicleEF	MCY	1.13	1.13
tblVehicleEF	MCY	0.31	0.26
tblVehicleEF	MCY	2.6870e-003	2.6900e-003
tblVehicleEF	MCY	3.3470e-003	2.9420e-003
tblVehicleEF	MCY	2.5060e-003	2.5090e-003
tblVehicleEF	MCY	3.1280e-003	2.7500e-003
tblVehicleEF	MCY	1.05	1.07
tblVehicleEF	MCY	0.58	0.59
tblVehicleEF	MCY	0.62	0.63
tblVehicleEF	MCY	2.56	2.57
tblVehicleEF	MCY	0.47	0.46
tblVehicleEF	MCY	1.98	1.75
tblVehicleEF	MCY	2.2930e-003	2.2240e-003
tblVehicleEF	MCY	6.4000e-004	5.7000e-004
tblVehicleEF	MCY	1.05	1.07
tblVehicleEF	MCY	0.58	0.59

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tblVehicleEF	MCY	0.62	0.63
tblVehicleEF	MCY	3.22	3.23
tblVehicleEF	MCY	0.47	0.46
tblVehicleEF	MCY	2.15	1.91
tblVehicleEF	MCY	0.55	0.37
tblVehicleEF	MCY	0.13	0.20
tblVehicleEF	MCY	17.39	17.42
tblVehicleEF	MCY	8.90	7.86
tblVehicleEF	MCY	192.02	223.55
tblVehicleEF	MCY	42.23	55.68
tblVehicleEF	MCY	0.99	0.99
tblVehicleEF	MCY	0.29	0.25
tblVehicleEF	MCY	2.6870e-003	2.6900e-003
tblVehicleEF	MCY	3.3470e-003	2.9420e-003
tblVehicleEF	MCY	2.5060e-003	2.5090e-003
tblVehicleEF	MCY	3.1280e-003	2.7500e-003
tblVehicleEF	MCY	1.70	1.69
tblVehicleEF	MCY	0.64	0.65
tblVehicleEF	MCY	1.02	1.01
tblVehicleEF	MCY	2.51	2.52
tblVehicleEF	MCY	0.44	0.42
tblVehicleEF	MCY	1.77	1.57
tblVehicleEF	MCY	2.2820e-003	2.2120e-003
tblVehicleEF	MCY	6.2000e-004	5.5100e-004
tblVehicleEF	MCY	1.70	1.69
tblVehicleEF	MCY	0.64	0.65
tblVehicleEF	MCY	1.02	1.01

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tblVehicleEF	MCY	3.16	3.17
tblVehicleEF	MCY	0.44	0.42
tblVehicleEF	MCY	1.93	1.71
tblVehicleEF	MCY	0.56	0.38
tblVehicleEF	MCY	0.15	0.23
tblVehicleEF	MCY	18.08	18.17
tblVehicleEF	MCY	9.96	8.84
tblVehicleEF	MCY	192.02	224.96
tblVehicleEF	MCY	42.23	57.99
tblVehicleEF	MCY	1.10	1.10
tblVehicleEF	MCY	0.31	0.27
tblVehicleEF	MCY	2.6870e-003	2.6900e-003
tblVehicleEF	MCY	3.3470e-003	2.9420e-003
tblVehicleEF	MCY	2.5060e-003	2.5090e-003
tblVehicleEF	MCY	3.1280e-003	2.7500e-003
tblVehicleEF	MCY	1.14	1.16
tblVehicleEF	MCY	0.73	0.75
tblVehicleEF	MCY	0.59	0.60
tblVehicleEF	MCY	2.57	2.58
tblVehicleEF	MCY	0.55	0.54
tblVehicleEF	MCY	2.02	1.79
tblVehicleEF	MCY	2.2950e-003	2.2260e-003
tblVehicleEF	MCY	6.4400e-004	5.7400e-004
tblVehicleEF	MCY	1.14	1.16
tblVehicleEF	MCY	0.73	0.75
tblVehicleEF	MCY	0.59	0.60
tblVehicleEF	MCY	3.23	3.24

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tblVehicleEF	MCY	0.55	0.54
tblVehicleEF	MCY	2.20	1.95
tblVehicleEF	MDV	6.3390e-003	2.5650e-003
tblVehicleEF	MDV	5.5190e-003	0.04
tblVehicleEF	MDV	0.75	0.66
tblVehicleEF	MDV	1.21	2.10
tblVehicleEF	MDV	401.54	324.09
tblVehicleEF	MDV	80.14	62.35
tblVehicleEF	MDV	0.07	0.04
tblVehicleEF	MDV	0.09	0.17
tblVehicleEF	MDV	1.7850e-003	1.2940e-003
tblVehicleEF	MDV	2.0430e-003	1.3100e-003
tblVehicleEF	MDV	1.6430e-003	1.1920e-003
tblVehicleEF	MDV	1.8790e-003	1.2040e-003
tblVehicleEF	MDV	0.05	0.06
tblVehicleEF	MDV	0.11	0.09
tblVehicleEF	MDV	0.06	0.07
tblVehicleEF	MDV	0.02	0.01
tblVehicleEF	MDV	0.07	0.04
tblVehicleEF	MDV	0.07	0.18
tblVehicleEF	MDV	4.0160e-003	3.2030e-003
tblVehicleEF	MDV	8.2100e-004	6.1700e-004
tblVehicleEF	MDV	0.05	0.06
tblVehicleEF	MDV	0.11	0.09
tblVehicleEF	MDV	0.06	0.07
tblVehicleEF	MDV	0.02	0.01
tblVehicleEF	MDV	0.07	0.04

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tblVehicleEF	MDV	0.08	0.20
tblVehicleEF	MDV	6.7300e-003	2.7360e-003
tblVehicleEF	MDV	4.9320e-003	0.04
tblVehicleEF	MDV	0.83	0.72
tblVehicleEF	MDV	1.04	1.79
tblVehicleEF	MDV	419.01	333.08
tblVehicleEF	MDV	80.14	61.80
tblVehicleEF	MDV	0.06	0.04
tblVehicleEF	MDV	0.08	0.15
tblVehicleEF	MDV	1.7850e-003	1.2940e-003
tblVehicleEF	MDV	2.0430e-003	1.3100e-003
tblVehicleEF	MDV	1.6430e-003	1.1920e-003
tblVehicleEF	MDV	1.8790e-003	1.2040e-003
tblVehicleEF	MDV	0.08	0.10
tblVehicleEF	MDV	0.11	0.10
tblVehicleEF	MDV	0.08	0.09
tblVehicleEF	MDV	0.02	0.01
tblVehicleEF	MDV	0.07	0.04
tblVehicleEF	MDV	0.07	0.16
tblVehicleEF	MDV	4.1920e-003	3.2920e-003
tblVehicleEF	MDV	8.1900e-004	6.1200e-004
tblVehicleEF	MDV	0.08	0.10
tblVehicleEF	MDV	0.11	0.10
tblVehicleEF	MDV	0.08	0.09
tblVehicleEF	MDV	0.02	0.02
tblVehicleEF	MDV	0.07	0.04
tblVehicleEF	MDV	0.07	0.18

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tblVehicleEF	MDV	6.2120e-003	2.5110e-003
tblVehicleEF	MDV	5.6440e-003	0.04
tblVehicleEF	MDV	0.73	0.64
tblVehicleEF	MDV	1.24	2.17
tblVehicleEF	MDV	395.12	320.77
tblVehicleEF	MDV	80.14	62.48
tblVehicleEF	MDV	0.07	0.04
tblVehicleEF	MDV	0.09	0.17
tblVehicleEF	MDV	1.7850e-003	1.2940e-003
tblVehicleEF	MDV	2.0430e-003	1.3100e-003
tblVehicleEF	MDV	1.6430e-003	1.1920e-003
tblVehicleEF	MDV	1.8790e-003	1.2040e-003
tblVehicleEF	MDV	0.05	0.06
tblVehicleEF	MDV	0.12	0.10
tblVehicleEF	MDV	0.05	0.07
tblVehicleEF	MDV	0.02	9.8820e-003
tblVehicleEF	MDV	0.08	0.05
tblVehicleEF	MDV	0.08	0.19
tblVehicleEF	MDV	3.9520e-003	3.1700e-003
tblVehicleEF	MDV	8.2200e-004	6.1800e-004
tblVehicleEF	MDV	0.05	0.06
tblVehicleEF	MDV	0.12	0.10
tblVehicleEF	MDV	0.05	0.07
tblVehicleEF	MDV	0.02	0.01
tblVehicleEF	MDV	0.08	0.05
tblVehicleEF	MDV	0.08	0.20
tblVehicleEF	MH	6.1320e-003	3.9240e-003

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tblVehicleEF	MH	0.02	0.02
tblVehicleEF	MH	0.35	0.25
tblVehicleEF	MH	3.47	1.59
tblVehicleEF	MH	1,105.40	1,302.02
tblVehicleEF	MH	57.42	15.78
tblVehicleEF	MH	0.67	0.84
tblVehicleEF	MH	0.58	0.24
tblVehicleEF	MH	0.01	0.01
tblVehicleEF	MH	9.1680e-003	0.01
tblVehicleEF	MH	8.3700e-004	2.1200e-004
tblVehicleEF	MH	3.2140e-003	3.2830e-003
tblVehicleEF	MH	8.7360e-003	0.01
tblVehicleEF	MH	7.7000e-004	1.9500e-004
tblVehicleEF	MH	0.46	0.35
tblVehicleEF	MH	0.03	0.02
tblVehicleEF	MH	0.23	0.18
tblVehicleEF	MH	0.03	0.03
tblVehicleEF	MH	8.3890e-003	4.5000e-003
tblVehicleEF	MH	0.20	0.07
tblVehicleEF	MH	0.01	0.01
tblVehicleEF	MH	6.3400e-004	1.5600e-004
tblVehicleEF	MH	0.46	0.35
tblVehicleEF	MH	0.03	0.02
tblVehicleEF	MH	0.23	0.18
tblVehicleEF	MH	0.03	0.03
tblVehicleEF	MH	8.3890e-003	4.5000e-003
tblVehicleEF	MH	0.22	0.08

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tblVehicleEF	MH	6.2580e-003	3.9860e-003
tblVehicleEF	MH	0.01	0.02
tblVehicleEF	MH	0.36	0.25
tblVehicleEF	MH	3.28	1.50
tblVehicleEF	MH	1,105.40	1,302.03
tblVehicleEF	MH	57.42	15.64
tblVehicleEF	MH	0.62	0.79
tblVehicleEF	MH	0.55	0.23
tblVehicleEF	MH	0.01	0.01
tblVehicleEF	MH	9.1680e-003	0.01
tblVehicleEF	MH	8.3700e-004	2.1200e-004
tblVehicleEF	MH	3.2140e-003	3.2830e-003
tblVehicleEF	MH	8.7360e-003	0.01
tblVehicleEF	MH	7.7000e-004	1.9500e-004
tblVehicleEF	MH	0.68	0.50
tblVehicleEF	MH	0.03	0.02
tblVehicleEF	MH	0.32	0.25
tblVehicleEF	MH	0.03	0.03
tblVehicleEF	MH	8.1960e-003	4.3850e-003
tblVehicleEF	MH	0.20	0.07
tblVehicleEF	MH	0.01	0.01
tblVehicleEF	MH	6.3100e-004	1.5500e-004
tblVehicleEF	MH	0.68	0.50
tblVehicleEF	MH	0.03	0.02
tblVehicleEF	MH	0.32	0.25
tblVehicleEF	MH	0.03	0.03
tblVehicleEF	MH	8.1960e-003	4.3850e-003

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tblVehicleEF	MH	0.21	0.08
tblVehicleEF	MH	6.0980e-003	3.9060e-003
tblVehicleEF	MH	0.02	0.02
tblVehicleEF	MH	0.35	0.25
tblVehicleEF	MH	3.51	1.61
tblVehicleEF	MH	1,105.40	1,302.02
tblVehicleEF	MH	57.42	15.81
tblVehicleEF	MH	0.66	0.83
tblVehicleEF	MH	0.58	0.24
tblVehicleEF	MH	0.01	0.01
tblVehicleEF	MH	9.1680e-003	0.01
tblVehicleEF	MH	8.3700e-004	2.1200e-004
tblVehicleEF	MH	3.2140e-003	3.2830e-003
tblVehicleEF	MH	8.7360e-003	0.01
tblVehicleEF	MH	7.7000e-004	1.9500e-004
tblVehicleEF	MH	0.48	0.36
tblVehicleEF	MH	0.04	0.03
tblVehicleEF	MH	0.22	0.17
tblVehicleEF	MH	0.03	0.03
tblVehicleEF	MH	8.8940e-003	4.7880e-003
tblVehicleEF	MH	0.21	0.07
tblVehicleEF	MH	0.01	0.01
tblVehicleEF	MH	6.3500e-004	1.5600e-004
tblVehicleEF	MH	0.48	0.36
tblVehicleEF	MH	0.04	0.03
tblVehicleEF	MH	0.22	0.17
tblVehicleEF	MH	0.03	0.03

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tblVehicleEF	MH	8.8940e-003	4.7880e-003
tblVehicleEF	MH	0.23	0.08
tblVehicleEF	MHD	0.02	4.0120e-003
tblVehicleEF	MHD	2.2720e-003	9.2800e-004
tblVehicleEF	MHD	0.03	9.0210e-003
tblVehicleEF	MHD	0.34	0.38
tblVehicleEF	MHD	0.21	0.13
tblVehicleEF	MHD	3.49	0.91
tblVehicleEF	MHD	137.74	57.82
tblVehicleEF	MHD	1,122.07	914.01
tblVehicleEF	MHD	56.97	9.25
tblVehicleEF	MHD	0.35	0.29
tblVehicleEF	MHD	0.69	1.08
tblVehicleEF	MHD	10.50	1.66
tblVehicleEF	MHD	4.8000e-005	1.2800e-004
tblVehicleEF	MHD	2.8330e-003	6.3460e-003
tblVehicleEF	MHD	7.3800e-004	1.1100e-004
tblVehicleEF	MHD	4.6000e-005	1.2300e-004
tblVehicleEF	MHD	2.7060e-003	6.0650e-003
tblVehicleEF	MHD	6.7800e-004	1.0200e-004
tblVehicleEF	MHD	7.3400e-004	3.8600e-004
tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	0.02	0.02
tblVehicleEF	MHD	5.5300e-004	2.8800e-004
tblVehicleEF	MHD	0.03	9.1940e-003
tblVehicleEF	MHD	0.01	0.02
tblVehicleEF	MHD	0.22	0.04

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tblVehicleEF	MHD	1.3260e-003	5.4900e-004
tblVehicleEF	MHD	0.01	8.7280e-003
tblVehicleEF	MHD	6.3100e-004	9.2000e-005
tblVehicleEF	MHD	7.3400e-004	3.8600e-004
tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	0.03	0.03
tblVehicleEF	MHD	5.5300e-004	2.8800e-004
tblVehicleEF	MHD	0.04	0.01
tblVehicleEF	MHD	0.01	0.02
tblVehicleEF	MHD	0.24	0.05
tblVehicleEF	MHD	0.01	3.8140e-003
tblVehicleEF	MHD	2.2900e-003	9.4400e-004
tblVehicleEF	MHD	0.03	8.7070e-003
tblVehicleEF	MHD	0.24	0.33
tblVehicleEF	MHD	0.21	0.13
tblVehicleEF	MHD	3.32	0.87
tblVehicleEF	MHD	145.89	57.53
tblVehicleEF	MHD	1,122.07	914.01
tblVehicleEF	MHD	56.97	9.17
tblVehicleEF	MHD	0.36	0.28
tblVehicleEF	MHD	0.65	1.02
tblVehicleEF	MHD	10.48	1.65
tblVehicleEF	MHD	4.0000e-005	1.1100e-004
tblVehicleEF	MHD	2.8330e-003	6.3460e-003
tblVehicleEF	MHD	7.3800e-004	1.1100e-004
tblVehicleEF	MHD	3.9000e-005	1.0600e-004
tblVehicleEF	MHD	2.7060e-003	6.0650e-003

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tblVehicleEF	MHD	6.7800e-004	1.0200e-004
tblVehicleEF	MHD	1.0930e-003	5.7100e-004
tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	0.02	0.02
tblVehicleEF	MHD	7.6000e-004	3.9400e-004
tblVehicleEF	MHD	0.03	9.2510e-003
tblVehicleEF	MHD	0.01	0.02
tblVehicleEF	MHD	0.21	0.04
tblVehicleEF	MHD	1.4020e-003	5.4600e-004
tblVehicleEF	MHD	0.01	8.7280e-003
tblVehicleEF	MHD	6.2800e-004	9.1000e-005
tblVehicleEF	MHD	1.0930e-003	5.7100e-004
tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	7.6000e-004	3.9400e-004
tblVehicleEF	MHD	0.04	0.01
tblVehicleEF	MHD	0.01	0.02
tblVehicleEF	MHD	0.23	0.05
tblVehicleEF	MHD	0.02	4.3000e-003
tblVehicleEF	MHD	2.2670e-003	9.2200e-004
tblVehicleEF	MHD	0.03	9.0730e-003
tblVehicleEF	MHD	0.46	0.46
tblVehicleEF	MHD	0.21	0.13
tblVehicleEF	MHD	3.53	0.92
tblVehicleEF	MHD	126.47	58.21
tblVehicleEF	MHD	1,122.07	914.00
tblVehicleEF	MHD	56.97	9.27

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tblVehicleEF	MHD	0.34	0.31
tblVehicleEF	MHD	0.68	1.06
tblVehicleEF	MHD	10.50	1.66
tblVehicleEF	MHD	5.8000e-005	1.5200e-004
tblVehicleEF	MHD	2.8330e-003	6.3460e-003
tblVehicleEF	MHD	7.3800e-004	1.1100e-004
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tblVehicleEF	MHD	6.7800e-004	1.0200e-004
tblVehicleEF	MHD	7.0700e-004	3.7400e-004
tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	5.2900e-004	2.7600e-004
tblVehicleEF	MHD	0.03	9.1770e-003
tblVehicleEF	MHD	0.02	0.02
tblVehicleEF	MHD	0.22	0.04
tblVehicleEF	MHD	1.2200e-003	5.5200e-004
tblVehicleEF	MHD	0.01	8.7280e-003
tblVehicleEF	MHD	6.3100e-004	9.2000e-005
tblVehicleEF	MHD	7.0700e-004	3.7400e-004
tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	0.04	0.03
tblVehicleEF	MHD	5.2900e-004	2.7600e-004
tblVehicleEF	MHD	0.04	0.01
tblVehicleEF	MHD	0.02	0.02
tblVehicleEF	MHD	0.25	0.05
tblVehicleEF	OBUS	0.01	8.0470e-003

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tblVehicleEF	OBUS	3.6380e-003	2.3330e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.25	0.69
tblVehicleEF	OBUS	0.29	0.29
tblVehicleEF	OBUS	4.09	1.87
tblVehicleEF	OBUS	116.13	97.94
tblVehicleEF	OBUS	1,229.43	1,178.79
tblVehicleEF	OBUS	65.56	15.91
tblVehicleEF	OBUS	0.26	0.43
tblVehicleEF	OBUS	0.65	1.15
tblVehicleEF	OBUS	2.59	0.94
tblVehicleEF	OBUS	2.4000e-005	1.4500e-004
tblVehicleEF	OBUS	2.8310e-003	7.6670e-003
tblVehicleEF	OBUS	9.4400e-004	1.9600e-004
tblVehicleEF	OBUS	2.3000e-005	1.3900e-004
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tblVehicleEF	OBUS	8.6800e-004	1.8000e-004
tblVehicleEF	OBUS	1.3660e-003	1.6390e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.03	0.06
tblVehicleEF	OBUS	7.7700e-004	8.9700e-004
tblVehicleEF	OBUS	0.04	0.02
tblVehicleEF	OBUS	0.04	0.07
tblVehicleEF	OBUS	0.26	0.09
tblVehicleEF	OBUS	1.1200e-003	9.3000e-004
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	7.2700e-004	1.5700e-004

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tblVehicleEF	OBUS	1.3660e-003	1.6390e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.05	0.07
tblVehicleEF	OBUS	7.7700e-004	8.9700e-004
tblVehicleEF	OBUS	0.04	0.02
tblVehicleEF	OBUS	0.04	0.07
tblVehicleEF	OBUS	0.29	0.10
tblVehicleEF	OBUS	0.01	8.1510e-003
tblVehicleEF	OBUS	3.6880e-003	2.3800e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.24	0.68
tblVehicleEF	OBUS	0.29	0.29
tblVehicleEF	OBUS	3.87	1.76
tblVehicleEF	OBUS	122.08	96.78
tblVehicleEF	OBUS	1,229.43	1,178.80
tblVehicleEF	OBUS	65.56	15.74
tblVehicleEF	OBUS	0.27	0.41
tblVehicleEF	OBUS	0.61	1.09
tblVehicleEF	OBUS	2.56	0.93
tblVehicleEF	OBUS	2.0000e-005	1.2900e-004
tblVehicleEF	OBUS	2.8310e-003	7.6670e-003
tblVehicleEF	OBUS	9.4400e-004	1.9600e-004
tblVehicleEF	OBUS	1.9000e-005	1.2300e-004
tblVehicleEF	OBUS	2.6910e-003	7.3200e-003
tblVehicleEF	OBUS	8.6800e-004	1.8000e-004
tblVehicleEF	OBUS	1.9960e-003	2.3600e-003
tblVehicleEF	OBUS	0.02	0.02

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tblVehicleEF	OBUS	0.03	0.06
tblVehicleEF	OBUS	1.0770e-003	1.2280e-003
tblVehicleEF	OBUS	0.04	0.02
tblVehicleEF	OBUS	0.04	0.07
tblVehicleEF	OBUS	0.25	0.09
tblVehicleEF	OBUS	1.1760e-003	9.1900e-004
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	7.2300e-004	1.5600e-004
tblVehicleEF	OBUS	1.9960e-003	2.3600e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.05	0.07
tblVehicleEF	OBUS	1.0770e-003	1.2280e-003
tblVehicleEF	OBUS	0.04	0.02
tblVehicleEF	OBUS	0.04	0.07
tblVehicleEF	OBUS	0.27	0.10
tblVehicleEF	OBUS	0.01	7.9240e-003
tblVehicleEF	OBUS	3.6250e-003	2.3200e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.26	0.69
tblVehicleEF	OBUS	0.29	0.29
tblVehicleEF	OBUS	4.14	1.89
tblVehicleEF	OBUS	107.92	99.55
tblVehicleEF	OBUS	1,229.43	1,178.79
tblVehicleEF	OBUS	65.56	15.95
tblVehicleEF	OBUS	0.25	0.46
tblVehicleEF	OBUS	0.63	1.13
tblVehicleEF	OBUS	2.60	0.94

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tblVehicleEF	OBUS	2.9000e-005	1.6700e-004
tblVehicleEF	OBUS	2.8310e-003	7.6670e-003
tblVehicleEF	OBUS	9.4400e-004	1.9600e-004
tblVehicleEF	OBUS	2.8000e-005	1.6000e-004
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tblVehicleEF	OBUS	8.6800e-004	1.8000e-004
tblVehicleEF	OBUS	1.3490e-003	1.6470e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.03	0.05
tblVehicleEF	OBUS	7.4600e-004	8.6500e-004
tblVehicleEF	OBUS	0.04	0.02
tblVehicleEF	OBUS	0.04	0.08
tblVehicleEF	OBUS	0.26	0.09
tblVehicleEF	OBUS	1.0410e-003	9.4500e-004
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	7.2800e-004	1.5800e-004
tblVehicleEF	OBUS	1.3490e-003	1.6470e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.05	0.07
tblVehicleEF	OBUS	7.4600e-004	8.6500e-004
tblVehicleEF	OBUS	0.04	0.02
tblVehicleEF	OBUS	0.04	0.08
tblVehicleEF	OBUS	0.29	0.10
tblVehicleEF	SBUS	0.81	0.10
tblVehicleEF	SBUS	5.4920e-003	3.9290e-003
tblVehicleEF	SBUS	0.05	8.7040e-003
tblVehicleEF	SBUS	9.22	4.13

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tblVehicleEF	SBUS	0.35	0.35
tblVehicleEF	SBUS	6.47	1.13
tblVehicleEF	SBUS	1,005.83	347.76
tblVehicleEF	SBUS	1,020.47	986.89
tblVehicleEF	SBUS	64.25	7.25
tblVehicleEF	SBUS	4.24	2.12
tblVehicleEF	SBUS	1.75	2.45
tblVehicleEF	SBUS	10.27	1.36
tblVehicleEF	SBUS	2.1450e-003	1.4870e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	8.8960e-003	0.01
tblVehicleEF	SBUS	1.1320e-003	9.5000e-005
tblVehicleEF	SBUS	2.0520e-003	1.4230e-003
tblVehicleEF	SBUS	2.6070e-003	2.5930e-003
tblVehicleEF	SBUS	8.4920e-003	0.01
tblVehicleEF	SBUS	1.0410e-003	8.7000e-005
tblVehicleEF	SBUS	4.1080e-003	1.4190e-003
tblVehicleEF	SBUS	0.03	0.01
tblVehicleEF	SBUS	1.09	0.47
tblVehicleEF	SBUS	2.4430e-003	8.5300e-004
tblVehicleEF	SBUS	0.06	0.05
tblVehicleEF	SBUS	0.02	0.02
tblVehicleEF	SBUS	0.36	0.05
tblVehicleEF	SBUS	9.9230e-003	3.2710e-003
tblVehicleEF	SBUS	9.8500e-003	9.3030e-003
tblVehicleEF	SBUS	7.5500e-004	7.2000e-005
tblVehicleEF	SBUS	4.1080e-003	1.4190e-003

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tblVehicleEF	SBUS	0.03	0.01
tblVehicleEF	SBUS	1.59	0.68
tblVehicleEF	SBUS	2.4430e-003	8.5300e-004
tblVehicleEF	SBUS	0.07	0.06
tblVehicleEF	SBUS	0.02	0.02
tblVehicleEF	SBUS	0.39	0.05
tblVehicleEF	SBUS	0.81	0.10
tblVehicleEF	SBUS	5.5600e-003	3.9760e-003
tblVehicleEF	SBUS	0.04	7.7690e-003
tblVehicleEF	SBUS	9.16	4.11
tblVehicleEF	SBUS	0.36	0.35
tblVehicleEF	SBUS	5.26	0.92
tblVehicleEF	SBUS	1,046.76	350.05
tblVehicleEF	SBUS	1,020.47	986.90
tblVehicleEF	SBUS	64.25	6.91
tblVehicleEF	SBUS	4.37	2.13
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tblVehicleEF	SBUS	10.24	1.36
tblVehicleEF	SBUS	1.8080e-003	1.2640e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	8.8960e-003	0.01
tblVehicleEF	SBUS	1.1320e-003	9.5000e-005
tblVehicleEF	SBUS	1.7300e-003	1.2090e-003
tblVehicleEF	SBUS	2.6070e-003	2.5930e-003
tblVehicleEF	SBUS	8.4920e-003	0.01
tblVehicleEF	SBUS	1.0410e-003	8.7000e-005
tblVehicleEF	SBUS	6.0110e-003	2.0510e-003

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tblVehicleEF	SBUS	0.03	0.01
tblVehicleEF	SBUS	1.09	0.47
tblVehicleEF	SBUS	3.3640e-003	1.1590e-003
tblVehicleEF	SBUS	0.06	0.05
tblVehicleEF	SBUS	0.02	0.02
tblVehicleEF	SBUS	0.32	0.04
tblVehicleEF	SBUS	0.01	3.2930e-003
tblVehicleEF	SBUS	9.8500e-003	9.3030e-003
tblVehicleEF	SBUS	7.3400e-004	6.8000e-005
tblVehicleEF	SBUS	6.0110e-003	2.0510e-003
tblVehicleEF	SBUS	0.03	0.01
tblVehicleEF	SBUS	1.59	0.68
tblVehicleEF	SBUS	3.3640e-003	1.1590e-003
tblVehicleEF	SBUS	0.07	0.06
tblVehicleEF	SBUS	0.02	0.02
tblVehicleEF	SBUS	0.35	0.05
tblVehicleEF	SBUS	0.81	0.10
tblVehicleEF	SBUS	5.4720e-003	3.9140e-003
tblVehicleEF	SBUS	0.05	8.9190e-003
tblVehicleEF	SBUS	9.30	4.16
tblVehicleEF	SBUS	0.35	0.35
tblVehicleEF	SBUS	6.69	1.17
tblVehicleEF	SBUS	949.31	344.60
tblVehicleEF	SBUS	1,020.47	986.89
tblVehicleEF	SBUS	64.25	7.32
tblVehicleEF	SBUS	4.05	2.11
tblVehicleEF	SBUS	1.72	2.41

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tblVehicleEF	SBUS	10.28	1.36
tblVehicleEF	SBUS	2.6100e-003	1.7960e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	8.8960e-003	0.01
tblVehicleEF	SBUS	1.1320e-003	9.5000e-005
tblVehicleEF	SBUS	2.4970e-003	1.7180e-003
tblVehicleEF	SBUS	2.6070e-003	2.5930e-003
tblVehicleEF	SBUS	8.4920e-003	0.01
tblVehicleEF	SBUS	1.0410e-003	8.7000e-005
tblVehicleEF	SBUS	3.9500e-003	1.3580e-003
tblVehicleEF	SBUS	0.03	0.01
tblVehicleEF	SBUS	1.10	0.47
tblVehicleEF	SBUS	2.3320e-003	8.1300e-004
tblVehicleEF	SBUS	0.06	0.05
tblVehicleEF	SBUS	0.02	0.02
tblVehicleEF	SBUS	0.37	0.05
tblVehicleEF	SBUS	9.3830e-003	3.2400e-003
tblVehicleEF	SBUS	9.8500e-003	9.3030e-003
tblVehicleEF	SBUS	7.5800e-004	7.2000e-005
tblVehicleEF	SBUS	3.9500e-003	1.3580e-003
tblVehicleEF	SBUS	0.03	0.01
tblVehicleEF	SBUS	1.59	0.68
tblVehicleEF	SBUS	2.3320e-003	8.1300e-004
tblVehicleEF	SBUS	0.07	0.06
tblVehicleEF	SBUS	0.02	0.02
tblVehicleEF	SBUS	0.40	0.06
tblVehicleEF	UBUS	1.59	5.87

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tblVehicleEF	UBUS	0.05	0.01
tblVehicleEF	UBUS	6.76	45.61
tblVehicleEF	UBUS	8.08	0.71
tblVehicleEF	UBUS	1,802.13	1,975.87
tblVehicleEF	UBUS	125.75	7.56
tblVehicleEF	UBUS	3.93	0.47
tblVehicleEF	UBUS	13.27	0.08
tblVehicleEF	UBUS	0.54	0.07
tblVehicleEF	UBUS	0.01	0.03
tblVehicleEF	UBUS	0.05	3.2560e-003
tblVehicleEF	UBUS	1.3660e-003	8.7000e-005
tblVehicleEF	UBUS	0.23	0.03
tblVehicleEF	UBUS	3.0000e-003	7.9690e-003
tblVehicleEF	UBUS	0.04	3.1090e-003
tblVehicleEF	UBUS	1.2560e-003	8.0000e-005
tblVehicleEF	UBUS	3.5970e-003	4.2400e-004
tblVehicleEF	UBUS	0.05	5.2380e-003
tblVehicleEF	UBUS	2.5590e-003	3.2800e-004
tblVehicleEF	UBUS	0.30	0.09
tblVehicleEF	UBUS	0.02	1.1490e-003
tblVehicleEF	UBUS	0.70	0.05
tblVehicleEF	UBUS	8.5410e-003	1.2030e-003
tblVehicleEF	UBUS	1.4050e-003	7.5000e-005
tblVehicleEF	UBUS	3.5970e-003	4.2400e-004
tblVehicleEF	UBUS	0.05	5.2380e-003
tblVehicleEF	UBUS	2.5590e-003	3.2800e-004
tblVehicleEF	UBUS	1.94	5.99

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tblVehicleEF	UBUS	0.02	1.1490e-003
tblVehicleEF	UBUS	0.77	0.05
tblVehicleEF	UBUS	1.59	5.87
tblVehicleEF	UBUS	0.05	9.9760e-003
tblVehicleEF	UBUS	6.77	45.62
tblVehicleEF	UBUS	7.09	0.63
tblVehicleEF	UBUS	1,802.13	1,975.87
tblVehicleEF	UBUS	125.75	7.41
tblVehicleEF	UBUS	3.70	0.47
tblVehicleEF	UBUS	13.21	0.08
tblVehicleEF	UBUS	0.54	0.07
tblVehicleEF	UBUS	0.01	0.03
tblVehicleEF	UBUS	0.05	3.2560e-003
tblVehicleEF	UBUS	1.3660e-003	8.7000e-005
tblVehicleEF	UBUS	0.23	0.03
tblVehicleEF	UBUS	3.0000e-003	7.9690e-003
tblVehicleEF	UBUS	0.04	3.1090e-003
tblVehicleEF	UBUS	1.2560e-003	8.0000e-005
tblVehicleEF	UBUS	5.1920e-003	6.2000e-004
tblVehicleEF	UBUS	0.06	5.4280e-003
tblVehicleEF	UBUS	3.5450e-003	4.5900e-004
tblVehicleEF	UBUS	0.30	0.09
tblVehicleEF	UBUS	0.02	1.0500e-003
tblVehicleEF	UBUS	0.65	0.04
tblVehicleEF	UBUS	8.5410e-003	1.2030e-003
tblVehicleEF	UBUS	1.3880e-003	7.3000e-005
tblVehicleEF	UBUS	5.1920e-003	6.2000e-004

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tblVehicleEF	UBUS	0.06	5.4280e-003
tblVehicleEF	UBUS	3.5450e-003	4.5900e-004
tblVehicleEF	UBUS	1.94	5.99
tblVehicleEF	UBUS	0.02	1.0500e-003
tblVehicleEF	UBUS	0.71	0.05
tblVehicleEF	UBUS	1.59	5.87
tblVehicleEF	UBUS	0.05	0.01
tblVehicleEF	UBUS	6.75	45.61
tblVehicleEF	UBUS	8.27	0.73
tblVehicleEF	UBUS	1,802.13	1,975.87
tblVehicleEF	UBUS	125.75	7.59
tblVehicleEF	UBUS	3.86	0.47
tblVehicleEF	UBUS	13.28	0.08
tblVehicleEF	UBUS	0.54	0.07
tblVehicleEF	UBUS	0.01	0.03
tblVehicleEF	UBUS	0.05	3.2560e-003
tblVehicleEF	UBUS	1.3660e-003	8.7000e-005
tblVehicleEF	UBUS	0.23	0.03
tblVehicleEF	UBUS	3.0000e-003	7.9690e-003
tblVehicleEF	UBUS	0.04	3.1090e-003
tblVehicleEF	UBUS	1.2560e-003	8.0000e-005
tblVehicleEF	UBUS	3.7100e-003	4.2400e-004
tblVehicleEF	UBUS	0.06	5.6380e-003
tblVehicleEF	UBUS	2.4860e-003	3.1500e-004
tblVehicleEF	UBUS	0.30	0.09
tblVehicleEF	UBUS	0.02	1.3810e-003
tblVehicleEF	UBUS	0.71	0.05

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tblVehicleEF	UBUS	8.5410e-003	1.2030e-003
tblVehicleEF	UBUS	1.4090e-003	7.5000e-005
tblVehicleEF	UBUS	3.7100e-003	4.2400e-004
tblVehicleEF	UBUS	0.06	5.6380e-003
tblVehicleEF	UBUS	2.4860e-003	3.1500e-004
tblVehicleEF	UBUS	1.94	5.99
tblVehicleEF	UBUS	0.02	1.3810e-003
tblVehicleEF	UBUS	0.78	0.05
tblVehicleTrips	CC_TL	10.10	0.00
tblVehicleTrips	CC_TL	10.10	13.36
tblVehicleTrips	CC_TL	10.10	13.27
tblVehicleTrips	CC_TL	10.10	11.92
tblVehicleTrips	CC_TL	10.10	11.15
tblVehicleTrips	CNW_TL	7.90	0.00
tblVehicleTrips	CNW_TL	7.90	13.36
tblVehicleTrips	CNW_TL	7.90	13.27
tblVehicleTrips	CNW_TL	7.90	11.92
tblVehicleTrips	CNW_TL	7.90	11.15
tblVehicleTrips	CW_TL	18.50	0.00
tblVehicleTrips	CW_TL	18.50	13.36
tblVehicleTrips	CW_TL	18.50	13.27
tblVehicleTrips	CW_TL	18.50	11.92
tblVehicleTrips	CW_TL	18.50	11.15
tblVehicleTrips	DV_TP	11.00	0.00
tblVehicleTrips	DV_TP	25.00	0.00
tblVehicleTrips	DV_TP	39.00	0.00
tblVehicleTrips	DV_TP	15.00	0.00

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tblVehicleTrips	DV_TP	35.00	0.00
tblVehicleTrips	HO_TL	12.90	8.50
tblVehicleTrips	HS_TL	9.60	8.50
tblVehicleTrips	HW_TL	19.80	8.50
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PB_TP	12.00	0.00
tblVehicleTrips	PB_TP	9.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PB_TP	11.00	0.00
tblVehicleTrips	PR_TP	86.00	100.00
tblVehicleTrips	PR_TP	63.00	100.00
tblVehicleTrips	PR_TP	52.00	100.00
tblVehicleTrips	PR_TP	82.00	100.00
tblVehicleTrips	PR_TP	54.00	100.00
tblVehicleTrips	ST_TR	22.75	0.00
tblVehicleTrips	ST_TR	5.67	6.91
tblVehicleTrips	ST_TR	20.87	0.53
tblVehicleTrips	ST_TR	1.64	1.93
tblVehicleTrips	ST_TR	49.97	41.14
tblVehicleTrips	SU_TR	16.74	0.00
tblVehicleTrips	SU_TR	4.84	5.90
tblVehicleTrips	SU_TR	26.73	0.68
tblVehicleTrips	SU_TR	0.76	0.82
tblVehicleTrips	SU_TR	25.24	20.78
tblVehicleTrips	WD_TR	1.89	0.00
tblVehicleTrips	WD_TR	5.81	7.08
tblVehicleTrips	WD_TR	1.29	1.36

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tblVehicleTrips	WD_TR	32.93	0.83
tblVehicleTrips	WD_TR	11.42	8.65
tblVehicleTrips	WD_TR	42.70	35.15
tblWater	IndoorWaterUseRate	102,552,436.33	73,909,407.76
tblWater	IndoorWaterUseRate	1,818,180.00	1,310,359.97
tblWater	IndoorWaterUseRate	147,857.86	285,583.40
tblWater	IndoorWaterUseRate	64,872,818.02	46,753,755.75
tblWater	IndoorWaterUseRate	27,036,470.34	19,485,149.08
tblWater	OutdoorWaterUseRate	5,957,406.75	9,539,735.42
tblWater	OutdoorWaterUseRate	64,652,622.90	103,529,764.30
tblWater	OutdoorWaterUseRate	4,675,320.00	7,486,699.78
tblWater	OutdoorWaterUseRate	90,622.56	388,910.97
tblWater	OutdoorWaterUseRate	39,760,759.43	63,669,838.40
tblWater	OutdoorWaterUseRate	16,570,739.89	26,535,115.18
tblWoodstoves	NumberCatalytic	78.70	0.00
tblWoodstoves	NumberNoncatalytic	78.70	0.00

2.0 Emissions Summary

2.1 Overall Construction - Project does not have any changes in construction emissions; therefore, no modeling data is presented.

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2.1 Overall Construction - Project does not have any changes in construction emissions; therefore, no modeling data is presented.

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area											0.0000	26.5518	26.5518	0.0254	0.0000	27.1857
Energy											0.0000	2,437.661 1	2,437.661 1	0.2091	0.0468	2,456.847 1
Mobile											0.0000	30,033.38 09	30,033.38 09	1.8607	0.0000	30,079.89 78
Waste											1,037.450 3	0.0000	1,037.450 3	61.3116	0.0000	2,570.239 1
Water											44.9689	590.5079	635.4768	4.6739	0.1205	788.2225
Total											1,082.419 2	33,088.10 17	34,170.52 09	68.0805	0.1673	35,922.39 23

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2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area											0.0000	26.5518	26.5518	0.0254	0.0000	27.1857
Energy											0.0000	2,437.6611	2,437.6611	0.2091	0.0468	2,456.8471
Mobile											0.0000	30,033.3809	30,033.3809	1.8607	0.0000	30,079.8978
Waste											1,037.4503	0.0000	1,037.4503	61.3116	0.0000	2,570.2391
Water											44.9689	590.5079	635.4768	4.6739	0.1205	788.2225
Total											1,082.4192	33,088.1017	34,170.5209	68.0805	0.1673	35,922.3923

[illegible]

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2.3 Vegetation**Vegetation**

	CO2e
Category	MT
New Trees	1,770.000 0
Vegetation Land Change	- 2,352.105 0
Total	-582.1050

3.0 Construction Detail - Project does not have any changes in construction emissions; therefore, no modeling data is presented.

3.0 Construction Detail - Project does not have any changes in construction emissions; therefore, no modeling data is presented.

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated											0.0000	30,033.38 09	30,033.38 09	1.8607	0.0000	30,079.89 78
Unmitigated											0.0000	30,033.38 09	30,033.38 09	1.8607	0.0000	30,079.89 78

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	0.00	0.00	0.00		
Condo/Townhouse	11,143.92	10,876.34	9286.60	33,540,083	33,540,083
Elementary School	1,020.00	0.00	0.00	3,543,072	3,543,072
Health Club	2.08	1.33	1.70	9,247	9,247
Office Park	3,157.25	704.45	299.30	10,407,114	10,407,114
Regional Shopping Center	12,829.75	15,016.10	7584.70	50,297,389	50,297,389
Total	28,153.00	26,598.22	17,172.30	97,796,904	97,796,904

4.3 Trip Type Information

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Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	0.00	0.00	0.00	33.00	48.00	19.00	66	28	6
Condo/Townhouse	8.50	8.50	8.50	40.20	19.20	40.60	100	0	0
Elementary School	13.36	13.36	13.36	65.00	30.00	5.00	100	0	0
Health Club	13.27	13.27	13.27	16.90	64.10	19.00	100	0	0
Office Park	11.92	11.92	11.92	33.00	48.00	19.00	100	0	0
Regional Shopping Center	11.15	11.15	11.15	16.30	64.70	19.00	100	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
City Park	0.532784	0.066872	0.193040	0.118759	0.025135	0.007041	0.019394	0.027484	0.001447	0.001699	0.004736	0.000679	0.000930
Condo/Townhouse	0.532784	0.066872	0.193040	0.118759	0.025135	0.007041	0.019394	0.027484	0.001447	0.001699	0.004736	0.000679	0.000930
Elementary School	0.532784	0.066872	0.193040	0.118759	0.025135	0.007041	0.019394	0.027484	0.001447	0.001699	0.004736	0.000679	0.000930
Health Club	0.532784	0.066872	0.193040	0.118759	0.025135	0.007041	0.019394	0.027484	0.001447	0.001699	0.004736	0.000679	0.000930
Office Park	0.532784	0.066872	0.193040	0.118759	0.025135	0.007041	0.019394	0.027484	0.001447	0.001699	0.004736	0.000679	0.000930
Regional Shopping Center	0.532784	0.066872	0.193040	0.118759	0.025135	0.007041	0.019394	0.027484	0.001447	0.001699	0.004736	0.000679	0.000930

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated											0.0000	2,187.621 1	2,187.621 1	0.2043	0.0423	2,205.321 3
Electricity Unmitigated											0.0000	2,187.621 1	2,187.621 1	0.2043	0.0423	2,205.321 3
NaturalGas Mitigated											0.0000	250.0400	250.0400	4.7900e- 003	4.5800e- 003	251.5258
NaturalGas Unmitigated											0.0000	250.0400	250.0400	4.7900e- 003	4.5800e- 003	251.5258

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5.2 Energy by Land Use - NaturalGas**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
City Park	0											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	2.49951e+006											0.0000	133.3835	133.3835	2.5600e-003	2.4500e-003	134.1761
Elementary School	250810											0.0000	13.3842	13.3842	2.6000e-004	2.5000e-004	13.4637
Health Club	59150											0.0000	3.1565	3.1565	6.0000e-005	6.0000e-005	3.1752
Office Park	1.3797e+006											0.0000	73.6261	73.6261	1.4100e-003	1.3500e-003	74.0636
Regional Shopping Center	496400											0.0000	26.4898	26.4898	5.1000e-004	4.9000e-004	26.6472
Total												0.0000	250.0400	250.0400	4.8000e-003	4.6000e-003	251.5258

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5.2 Energy by Land Use - NaturalGas**Mitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
City Park	0											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	2.49951e+006											0.0000	133.3835	133.3835	2.5600e-003	2.4500e-003	134.1761
Elementary School	250810											0.0000	13.3842	13.3842	2.6000e-004	2.5000e-004	13.4637
Health Club	59150											0.0000	3.1565	3.1565	6.0000e-005	6.0000e-005	3.1752
Office Park	1.3797e+006											0.0000	73.6261	73.6261	1.4100e-003	1.3500e-003	74.0636
Regional Shopping Center	496400											0.0000	26.4898	26.4898	5.1000e-004	4.9000e-004	26.6472
Total												0.0000	250.0400	250.0400	4.8000e-003	4.6000e-003	251.5258

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5.3 Energy by Land Use - Electricity**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	6.7682e+006	953.5125	0.0890	0.0184	961.2274
Elementary School	339221	47.7898	4.4600e-003	9.2000e-004	48.1765
Health Club	22050	3.1064	2.9000e-004	6.0000e-005	3.1316
Office Park	4.69025e+006	660.7683	0.0617	0.0128	666.1146
Regional Shopping Center	3.7084e+006	522.4440	0.0488	0.0101	526.6712
Total		2,187.6211	0.2043	0.0423	2,205.3213

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5.3 Energy by Land Use - Electricity**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	6.7682e+006	953.5125	0.0890	0.0184	961.2274
Elementary School	339221	47.7898	4.4600e-003	9.2000e-004	48.1765
Health Club	22050	3.1064	2.9000e-004	6.0000e-005	3.1316
Office Park	4.69025e+006	660.7683	0.0617	0.0128	666.1146
Regional Shopping Center	3.7084e+006	522.4440	0.0488	0.0101	526.6712
Total		2,187.6211	0.2043	0.0423	2,205.3213

6.0 Area Detail**6.1 Mitigation Measures Area**

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated											0.0000	26.5518	26.5518	0.0254	0.0000	27.1857
Unmitigated											0.0000	26.5518	26.5518	0.0254	0.0000	27.1857

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping											0.0000	26.5518	26.5518	0.0254	0.0000	27.1857
Total											0.0000	26.5518	26.5518	0.0254	0.0000	27.1857

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6.2 Area by SubCategory**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth											0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping											0.0000	26.5518	26.5518	0.0254	0.0000	27.1857
Total											0.0000	26.5518	26.5518	0.0254	0.0000	27.1857

7.0 Water Detail**7.1 Mitigation Measures Water**

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	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	635.4768	4.6739	0.1205	788.2225
Unmitigated	635.4768	4.6739	0.1205	788.2225

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7.2 Water by Land Use**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
City Park	0 / 9.53974	14.9315	1.3900e-003	2.9000e-004	15.0523
Condo/Townhouse	73.9094 / 103.53	321.0724	2.4361	0.0626	400.6351
Elementary School	1.31036 / 7.4867	14.5376	0.0440	1.2800e-003	16.0197
Health Club	0.285583 / 0.388911	1.2232	9.4100e-003	2.4000e-004	1.5305
Office Park	46.7538 / 63.6698	200.2540	1.5408	0.0396	250.5609
Regional Shopping Center	19.4851 / 26.5351	83.4581	0.6421	0.0165	104.4240
Total		635.4768	4.6739	0.1205	788.2225

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7.2 Water by Land Use**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
City Park	0 / 9.53974	14.9315	1.3900e-003	2.9000e-004	15.0523
Condo/Townhouse	73.9094 / 103.53	321.0724	2.4361	0.0626	400.6351
Elementary School	1.31036 / 7.4867	14.5376	0.0440	1.2800e-003	16.0197
Health Club	0.285583 / 0.388911	1.2232	9.4100e-003	2.4000e-004	1.5305
Office Park	46.7538 / 63.6698	200.2540	1.5408	0.0396	250.5609
Regional Shopping Center	19.4851 / 26.5351	83.4581	0.6421	0.0165	104.4240
Total		635.4768	4.6739	0.1205	788.2225

8.0 Waste Detail**8.1 Mitigation Measures Waste**

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Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	1,037.450 3	61.3116	0.0000	2,570.239 1
Unmitigated	1,037.450 3	61.3116	0.0000	2,570.239 1

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8.2 Waste by Land Use**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	2624.07	532.6625	31.4795	0.0000	1,319.6488
Elementary School	48.75	9.8958	0.5848	0.0000	24.5165
Health Club	0	0.0000	0.0000	0.0000	0.0000
Office Park	1424	289.0591	17.0829	0.0000	716.1318
Regional Shopping Center	1014	205.8328	12.1644	0.0000	509.9421
Total		1,037.4503	61.3116	0.0000	2,570.2391

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8.2 Waste by Land Use**Mitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhouse	2624.07	532.6625	31.4795	0.0000	1,319.6488
Elementary School	48.75	9.8958	0.5848	0.0000	24.5165
Health Club	0	0.0000	0.0000	0.0000	0.0000
Office Park	1424	289.0591	17.0829	0.0000	716.1318
Regional Shopping Center	1014	205.8328	12.1644	0.0000	509.9421
Total		1,037.4503	61.3116	0.0000	2,570.2391

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

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Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

	Total CO2	CH4	N2O	CO2e
Category	MT			
Unmitigated	-582.1050	0.0000	0.0000	-582.1050

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11.1 Vegetation Land Change**Vegetation Type**

	Initial/Final	Total CO2	CH4	N2O	CO2e
	Acres	MT			
Grassland	23.5 / 0	-101.2850	0.0000	0.0000	-101.2850
Scrub	157.4 / 0	- 2,250.820 0	0.0000	0.0000	- 2,250.820 0
Total		- 2,352.105 0	0.0000	0.0000	- 2,352.105 0

11.2 Net New Trees**Species Class**

	Number of Trees	Total CO2	CH4	N2O	CO2e
		MT			
Miscellaneous	2500	1,770.000 0	0.0000	0.0000	1,770.000 0
Total		1,770.000 0	0.0000	0.0000	1,770.000 0

Appendix IS-3

2021 Project Geology and Geologic Hazards Update



Project Nos.
6538.VCC.001
6538.OES.001

February 8, 2021

Ms. Ashley Rogers
Principal Planner
Eyestone Environmental
2121 Rosecrans Avenue, Suite 3355
El Segundo, CA 90245

Subject: Entrada South and Valencia Commerce Center
Newhall Ranch
Valencia, California

PROJECT GEOLOGY AND GEOLOGIC HAZARDS UPDATE

Dear Ms. Rogers:

The purpose of this report is to provide geotechnical opinions with respect to the description of site conditions, impacts, and mitigation measures presented in Section 4.13 – Geology and Geologic Hazards of the State-certified EIR (SCH No. 2000011025) for the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan (RMDP/SCP, hereinafter referred to as the 2017 Approved Project). Section 4.13 describes the existing geologic conditions and evaluates the potential for significant environmental impacts related to geologic hazards and processes for the 2017 Approved Project.

The information and analysis presented in Section 4.13 of the State-certified EIR are predominantly based on geotechnical engineering reports from Allan E. Seward Engineering Geology, Inc., and R.T. Frankian & Associates from 1994 to 2007. This report provides an updated point-by-point assessment of Section 4.13, with a comparison to the most current available geologic publications and site-specific geotechnical reports for the Project.

This report also considers whether the proposed incremental changes in the Entrada South and Valencia Commerce Center planning areas (hereinafter referred to as the Modified Project), as compared to the 2017 Approved Project, would result in new geotechnical impacts or a substantial increase in the severity of previously identified significant impacts. Of relevance to this analysis, the development footprints within the Entrada South and Valencia Commerce Center (VCC) planning areas would not increase under the Modified Project. Instead, the incremental changes proposed by the Modified Project would result in increased environmental protections within Unnamed Canyon 2, Hasley Creek and Castaic Creek by reducing permanent impacts through the enhanced preservation of on-site open space.

The information and conclusions presented herein demonstrate that further analysis of the Modified Project's potential geotechnical impacts is not required in the Supplemental Environmental Impact Report (SEIR) pursuant to CEQA Guidelines Sections 15162 and 15163.

EXISTING GEOTECHNICAL DATA

The following studies incorporate relevant work completed since 1998 for the Entrada South and Valencia Commerce Center planning areas; many of these studies post-date the reports referenced in Section 4.13.2 – Methodology of the State-certified EIR.

TABLE 1

CONSULTANT	REPORT TYPE	REPORT AREA	REFERENCE
R.T. Frankian & Associates	100-Scale Plan Review	Entrada South	March 18, 2005; Job No. 2004-700-21, Volume I and II.
R.T. Frankian & Associates	Response to Los Angeles County Department of Public Works, Geotechnical Review	Entrada South	April 6, 2007; Job No. 2004-700-22, Volume I and II.
R.T. Frankian & Associates	Response to Los Angeles County Department of Public Works Geotechnical Review No. 2, Vesting Tentative Tract Map No. 53295	Entrada North and South	Job No. 2004-700-22; January 16, 2008
R.T. Frankian & Associates	Geotechnical Investigation	Entrada South	January 15, 2008; Job No. 2004-701-22.
R.T. Frankian & Associates	Response to Los Angeles County, Department of Public Works, Geotechnical Review No. 2	Entrada South	January 16, 2008; Job No. 2004-700-22.
R.T. Frankian & Associates	100-Scale Plan Review	Entrada South	November 13, 2009; Job No. 2004-700-21.
R.T. Frankian & Associates	100-Scale Plan Review	Entrada South	September 16, 2013; Job No. 2004-700-021.
R.T. Frankian & Associates	Geologic/Geotechnical Evaluation for Environmental Impact Report	Entrada South	October 31, 2013; Job No. 2004-700-52(R2).
R.T. Frankian & Associates	Geotechnical Update Report and Revised Plan Review	Entrada South	September 28, 2017; Job No. 2004-700-021.
Allan E. Seward Engineering Geology, Inc.	Summary of Conditions	Valencia Commerce Center	Job No. 98-10541-5; March 5, 1998
Allan E. Seward Engineering Geology, Inc.	Holser Fault Investigation	Valencia Commerce Center	Job No. 00-1219-9; April 12, 2000
Geolabs-Westlake Village	Geotechnical Investigation and Surface Fault Rupture Hazard Assessment	Valencia Commerce Center	W.O. 9083; May 31, 2007
Leighton & Associates, Inc.	Updated Geotechnical Report and Responses to County of Los Angeles Review Comments	Valencia Commerce Center	Project No. 10738.001; February 9, 2015
Leighton & Associates, Inc.	Updated Geotechnical Report and Responses to County of Los Angeles Review Comments	Valencia Commerce Center	Project No. 10738.001; December 3, 2015.

Previous geotechnical investigations described in the above-referenced reports for Plan Areas 1 through 3 at Valencia Commerce Center included 34 conventional borings (hollow-stem auger and mud-rotary), 28 large-diameter bucket-auger borings, 40 cone penetration test (CPT) soundings, 18 fault trenches, and 67 test pits. Previous geotechnical investigations for Entrada South included 7 hollow-stem auger boreholes, 7 large-diameter bucket-auger boreholes, 5 cone penetration test (CPT) soundings, and 62 test pits. These reports also included laboratory testing of soil samples recovered from the borings and test pits; fault hazard assessments; and geotechnical analyses to evaluate expected ground shaking levels, slope stability, seismically induced vertical and lateral ground displacement, settlement of native soil, and expansion potential of soil. In addition, they contain gradational characteristics of borrow areas for suitability in the soil-cement stabilized creek banks.

The reports listed in Table 1 have not identified any new or unique impacts not previously disclosed and considered in the State-certified EIR.

REGULATORY BACKGROUND

Geotechnical constraints are comprehensively addressed and remedied through the application of mandatory regulatory compliance standards in place at the local level. For example, development associated with the Modified Project will be designed and constructed in accordance with the Los Angeles County's Building Code, the County of Los Angeles Grading Guidelines, County of Los Angeles Department of Public Works Manual for Preparation of Geotechnical Reports, and the 2019 California Building Code (CBC), which is based on International Building Code (IBC) standards. New construction, alteration, or rehabilitation also shall comply with applicable ordinances set forth by the County and/or by the most recent County building and seismic codes in effect at the time of project design.

Prior to approval of the tentative map, a 100-scale tentative subdivision map geotechnical/engineering geology report will be completed and submitted to Los Angeles County for review and approval, as required by the Los Angeles Department of Public Works Manual for Preparation of Geotechnical Reports Section 2.2.2.

Consistent with the County's Grading Code and adopted Grading Guidelines (January 1, 2008), the Modified Project shall comply with the following regulatory requirements.

General Grading

- All grading and construction shall conform to the latest County of Los Angeles Building Codes and the State Model Water Efficiency Landscape Ordinance unless specifically noted on grading plans.
- Prior to issuance of a grading permit, three (3) sets of current (less than one-year-old) soils engineering and/or geology investigation reports shall be submitted to the Los Angeles County Department of Public Works. They shall provide:
 - a. Information on the nature, distribution, physical and engineering properties of the soil on site and/or soil to be used as fill, and include recommendations on grading procedures.
 - b. Provide copies of the original soils engineering and/or geologic reports and all supplemental/addendum reports for the grading files.

- c. The reports must comply with the provisions of the "Manual for Preparation of Geotechnical Reports."
- The Soil Engineer shall provide sufficient inspections during the preparation of the natural ground and the placement and compaction of the fill to be satisfied that the work is being performed in accordance with the plan and applicable Code requirements.
- All fill shall be compacted to the following minimum relative compaction criteria.
 - a. 90 percent of maximum dry density within 40 feet of finish grade
 - b. 93 percent of maximum dry density deeper than 40 feet below finish grade, unless a lower relative compaction (not less than 90 percent of maximum dry density) is justified by the geotechnical engineer. The relative compaction shall be determined by A.S.T.M. soil compaction test D1557-91 where applicable: Where not applicable, a test acceptable to the Building Official shall be used. (Section J107.5 of the County of Los Angeles Building Code.)

Expansive Soil

- If expansive soil is encountered during grading, recommendations shall be implemented to reduce the hazard, including but not limited to removing expansive soil and replacing with engineered fill, installing drainage systems, using stiffened foundation systems, or conducting engineered preparation of building pads.
- Building pads located in cut/fill transition areas shall be overexcavated a minimum of three (3) feet below the proposed bottom of footing.

Slope Stability

- The slope of cut surfaces shall be no steeper than is safe for the intended use, and shall be not more than one unit vertical in two units horizontal (50 percent slope) unless the owner or the owner's authorized agent furnishes a geotechnical or an engineering geology report, or both, justifying a steeper slope.
- Fill slopes shall not be constructed on natural slopes steeper than 2 units horizontal to 1 unit vertical (50 percent slope). The ground surface shall be prepared to receive fill by removing vegetation, topsoil and other unsuitable materials (including any existing fill that does not meet the requirements of this Appendix), and scarifying the ground to provide a bond with the fill material.
- Subdrains shall be provided under all fills placed in natural drainage courses and in other locations where seepage is evident, except where the Geotechnical Engineer or Engineering Geologist recommends otherwise.

Erosion

- All active grading projects with grading proposed within the rainy season, October 15 to April 15, require an Erosion and Sediment Control Plan (ESCP). Grading permits will not be issued until ESCPs are approved or details for erosion control are included with the grading plan. (Section J110 of the County of Los Angeles Building Code.)

- Erosion is a problem for all graded slopes higher than 30 feet. For slopes flatter than 3 units horizontal to 1 unit vertical and steeper than 5 units horizontal to 1 unit vertical, a paved swale or ditch shall be installed at 30-foot vertical intervals to control surface drainage and debris.
- The surface of all cut slopes more than 5 feet in height and fill slopes more than 3 feet in height shall be protected against damage from erosion by planting with grass or ground cover plants. (Section J110 of the County of Los Angeles Building Code.) Slopes exceeding 15 feet in vertical height shall also be planted with shrubs, spaced at maximum 10 feet on centers; or trees, spaced at not to exceed 20 feet on center; or a combination of shrubs and trees at equivalent spacing, in addition to the grass or ground cover plants.
- Prior to any construction activities, including grading, all stormwater pollution prevention measures including erosion control devices which contain sediments must be installed.

Consistent with the County of Los Angeles Department of Public Works Manual for Preparation of Geotechnical Reports (July 1, 2013), the County of Los Angeles Building Code, and the Alquist-Priolo Earthquake Fault Zoning Act, reporting and design for the Modified Project shall comply with the following regulatory requirements.

General Reporting

- The soils engineering and geotechnical reports must demonstrate that property and public welfare will be safeguarded in accordance with current County Codes and policies. Provisions in the County of Los Angeles Building Code Section 110.2 require that the building site will be free of geotechnical hazards, such as landslide, settlement, or slippage, and that the proposed work will not adversely affect off-site property. County of Los Angeles Building Code Section 111 requires the report contain a finding to show compliance with Section 110.2.
- The geotechnical report in support of a grading plan must address the existing on-site conditions, identify potential geologic and geotechnical hazards, and provide conclusions and recommendations for the proposed development. Supporting data, analyses, and calculations for the basis of the conclusions and recommendations must be provided within the report. The data, analyses, and calculations must be in sufficient detail to demonstrate that the proposed grading will not cause, or be affected by, on-site and off-site geologic and geotechnical hazards.

Corrective Grading

- Corrective work necessary to address geologic and geotechnical hazards must be addressed at the tentative map stage.

Slope Stability

- Slope stability analysis (including establishing design criteria and performing calculations) will generally be required for all cut, fill, and natural slopes when the slope gradient is steeper than 2 units horizontal to 1 unit vertical and/or any gradient when the slope height exceeds 30 feet. Slope stability analyses may be required for any slope height or gradient when there are indications that the slope may not meet County minimum standards.

- Slope stability analyses must be accompanied by a summary of the input parameters, types of analyses conducted, results of analyses, and prints of the input and output conducted by either hand calculation or computer software.
- The minimum factor of safety for gross static stability is 1.50 for static loads.
- The minimum factor of safety for pseudostatic stability is 1.10 for loading due to seismic shaking

Artificial Fill

- Engineered fill and proposed structures shall not be placed into or founded on unsuitable soil. The geotechnical consultants must demonstrate that engineered fill and proposed structures will be placed on competent natural materials or certified engineering fill.

Consolidation and Hydrocompression

- The geotechnical consultant shall evaluate the possibility that consolidation and/or hydrocompression may occur within on-site fill soil and conduct appropriate field sampling and testing and laboratory tests to quantify the full collapse potential of applicable soil layers.

Liquefaction

- The geotechnical report must consider liquefaction potential of the foundation soil and make recommendations to protect the public during such an event.

Lateral Spread

- Soil layers having equivalent (N1)60 blow counts less than or equal to 15 should be evaluated to assess the lateral spreading hazard.

Expansive Soil and Rock

- Geotechnical reports shall provide the EI test results, or equivalent, when expansive soil and/or rock are determined to be on site. Test results that indicate an EI greater than (>) 50 shall be addressed with data and analyses to support pressures acting on proposed structures.

Corrosion Testing

- Chemical testing (sulfate, chloride, resistivity, pH, etc.) of on-site soil shall address the presence of chemicals deleterious to concrete and ferrous materials. The tests must be conducted in accordance with California Test Methods, Department of Transportation, or equivalent.
- An evaluation of the site soil should include sampling and corrosion testing of the in-situ soil to remain in place and potential fill sources.

Erosion

- The geotechnical engineer shall evaluate the erosive properties of the soil and make appropriate recommendations to eliminate slope failure due to erosion caused by rainfall and irrigation of the slope. Soil with an effective saturated cohesion of less than 250 psf is considered susceptible to surface erosion.

Landslide Stabilization

- Landslide stabilization includes the stabilization of existing and potential landslides. It is required that a determination be made regarding the stability of ancient, inactive, active, and potential landslides.
- If landslides that do not meet the County minimum standards are to remain, it must be demonstrated that they will not adversely affect the proposed development and that the proposed development, including landscape watering and septic systems, will not affect the landslide. When unmitigated geologic hazards are part of a subdivision development, the entire areas affected by the hazard must be designated as Restricted Use Areas (RUAs).

Active Faulting

- An “active fault,” as defined by the State Mining and Geology Board (SMGB), is a fault that has had surface displacement within Holocene time (about the last 11,700 years), hence constituting a potential hazard to structures that might be located across it.
- No structure for human occupancy, identified as a project under California Public Resource Code Section 2621.6 (Alquist-Priolo Earthquake Fault Zoning Act), shall be permitted to be placed across the trace of an active fault. Furthermore, as the area within fifty (50) feet of such active faults shall be presumed to be underlain by active branches of that fault unless proven otherwise by an appropriate geologic investigation and report prepared as specified in Section 3603(d) of this subchapter, no such structures shall be permitted in this area.

THRESHOLDS OF SIGNIFICANCE, IMPACT, AND MITIGATION

This section of the report summarizes the significance criteria, environmental impact findings, and mitigation measures identified in the State-certified EIR to reduce impacts to less than significant levels. The Significance Threshold Criteria 1-7 (Section 4.13.5 of the State-certified EIR) are denoted in *italic font* below. The State-certified EIR’s impact findings (Section 4.13.6) and mitigation measures (Section 4.13.7), as well as our opinion, follow each threshold criterion and are written in regular font.

Section 4.13.5 of the State-certified EIR states that “...*geologic hazard impacts would be significant if implementation of the proposed Project or the alternatives would:*

1. *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*
 - (a) *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 fault.*

- *(b) Strong seismic ground shaking.*
- *(c) Seismic-related ground failure, including liquefaction.*
- *(d) Landslides*

1a. The State-certified EIR states that ground rupture, ground failure, and ground shaking from the Holser Fault are considered significant impacts and would potentially result in damage to RMDP infrastructure and people. Further, the State-certified EIR states that "...with mitigation, impacts under Significance Threshold 1 would be less than significant."

The Alquist-Priolo Earthquake Fault Zoning Act defines the term Holocene-active fault as one that has ruptured in the last 11,700 years. For faults considered "Holocene-active", the Alquist-Priolo Act establishes an Earthquake Fault Zone (EFZ) boundary 500 feet away from major active faults and 200 to 300 feet away from well-defined, minor faults. The EFZ maps delineate regulatory zones for known Holocene-active faults. The United States Geological Survey defines the Quaternary as being 2.58 million years old or younger (USGS 2018). The Pleistocene refers to a geologic period extending from the end of Holocene (11,700 years ago) to the end of Quaternary (2.58 million years ago).

As to the Entrada South planning area, no Holocene-active or pre-Holocene faults are known to exist within the planning area and the planning area is not located within an Alquist-Priolo Earthquake Fault Zone. The fault nearest the planning area is the Quaternary-aged Holser Fault, located approximately 0.46 miles northwest of the northwest corner of the site. The Alquist-Priolo mapping has not established an EFZ boundary for the Holser Fault, and the closest trace of the fault is more than 500 feet from the Entrada South planning area. Based on the distance from the site to the fault and the relative age of the fault, we conclude that the fault-rupture hazard at Entrada South is less than significant.

While the Valencia Commerce Center planning area also is not located within an Alquist-Priolo Earthquake Fault Zone, the State-certified EIR concluded that "...one strand of the Holser Fault is mapped within the VCC planning area" and "[t]he Holser Fault may have a recurrence interval slightly longer than Holocene time." (State-certified EIR Section 4.13.4.5.1 – On-Site Faults.) The State-certified EIR stated that implementation of mitigation measures to establish building setback zones, similar to SP-4.1-53 and SP-4.1-54, would reduce the impacts to less than significant. Further, the adopted VCC EIR requires a setback over the Holser Fault, as stated in Mitigation Measure VCC-GEO-1. Building setback zones along a trace of a Holocene-active fault are required as a matter of regulatory compliance (California Code of Regulations, Section 3603(a)).

In conjunction with a site-specific geotechnical investigation, Allan E. Seward Engineering Geology, Inc. (AES, 2000) stated that "...no distinct evidence of Holocene activity has been observed by this firm in over 22,000 lineal feet of trenches and cuts." Therefore, as the Alquist-Priolo Earthquake Fault Zoning Act defines a Holocene-active fault as one that has ruptured in the last 11,700 years, the Holser Fault is not considered active. The City of Santa Clarita General Plan (Safety Element, June 2011) describes the Holser Fault as having last ruptured in the Quaternary period defined as 2.58 million years further confirming the fault is not active.

The AES investigation northwest of the VCC planning area identified two west- northwest-trending branches of the Holser Fault referred to as the North Branch and South Branch (AES, 2000). Investigation of the North Branch of the Holser Fault at the VCC planning area yielded no evidence of faulting across the mapped fault trace. Investigation of the South Branch of the Holser Fault

considered the main trace of the fault, and also yielded no evidence of Holocene rupture at the VCC planning area. Although AES concluded that no evidence for Holocene surface fault rupture was found at the VCC planning area, and the recurrence interval for the fault was longer than Holocene time, AES recommended building setbacks from its South Branch. Considering this, the State-certified EIR concluded that ground rupture is considered a significant impact and would potentially result in damage to RMDP infrastructure and people.

In 2007, Geolabs performed a supplemental assessment of surface fault rupture hazards along the Holser Fault as part of a study for the VCC planning area's Tentative Map (TM) 18108. Geolabs stated in its 2007 report:

“...there is ambiguity in the manner in which AES projected their 160 feet wide Building Setback Zone on TPM 18108 for the Southern Branch or what this zone represents. This inconsistency, coupled with the data recorded offsite regarding the Southern Branch, leads us to believe that AES' projection of the Southern Branch of the Holser Fault is inappropriately located, as we see no evidence for a change in the strike of the Southern Branch according to the data AES has presented in their referenced reports. Assuming that this fault does not break the alluvium, the fault will migrate to the south within the bedrock under the alluvium (based on a consistent 65-degree southerly dip).”

As part of this study, Geolabs performed subsequent subsurface explorations, including a line of cone penetrometer tests (CPTs) completed perpendicular and across Seward's Building Setback Zone of the Southern Branch of the Holser Fault, which revealed “...no evidence of faulted alluvium.”

Based on a re-evaluation of the AES (2000) report, its own subsurface investigation, and other published data, Geolabs concluded, “[s]ince this fault did not displace sediments that are clearly pre-Holocene and most likely late-Pleistocene in age, we conclude that it is not active, and that a Building Setback Zone is not required on Tentative Parcel Map 18108 east of Commerce Center Drive.”

R.T. Frankian & Associates (RTF&A, 2008) subsequently reviewed and concurred with Geolabs' conclusions. According to a RTF&A 2008 letter, the Los Angeles County Department of Public Works' July 12 and 26, 2007 Review Sheets accept Geolabs' findings with respect to the Holser Fault.

Based on our review of the AES (2000), Geolabs (2007) and RTF&A (2008) reports, and given the pre-Holocene age of the fault, we believe the impact of surface rupture at Valencia Commerce Center is less than significant. Further, all buildings within the Modified Project must comply with the latest California Building Code requirements and Los Angeles County Code standards to address seismic shaking, as required by Modified Project Mitigation Measure GEO-1. Therefore, we do not recommend building setbacks.

1b. The State-certified EIR concluded that strong seismic ground shaking would be significant if implementation of the 2017 Approved Project would expose people or structures to substantial adverse effects including the risk of loss, injury, or death. To mitigate this significant ground shaking impact, Modified Project Mitigation Measure GEO-1 requires that structures be designed using sound engineering judgment and the CBC requirements, as a minimum. Seismic design

provisions of current building codes generally prescribe minimum lateral forces, applied statically to each habitable structure, combined with the gravity forces of dead and live loads. The code-prescribed lateral forces are generally considered to be substantially smaller than the comparable forces that would be associated with a major earthquake. Further Modified Project Mitigation Measure GEO-2 requires implementation of design requirements when the anticipated seismic differential settlement exceeds the County of Los Angeles' 1-inch seismic differential settlement standard. Therefore, structures should be able to: (1) resist minor earthquakes without damage, (2) resist moderate earthquakes without structural damage but with some nonstructural damage, and (3) resist major earthquakes without collapse, but with some structural, as well as nonstructural damage. It is reasonable to expect that well-designed and well-constructed structures will not collapse or cause loss of life in a major earthquake (SEAOC, 1996). These regulatory compliance requirements of the CBC along with Modified Project Mitigation Measures GEO-1 and GEO-2 will reduce impacts to a less than significant level.

1c. The State-certified EIR concluded that soil at the Valencia Commerce Center is not conducive to liquefaction and impacts would be less than significant. Additionally, the State-certified EIR concluded that some isolated liquefaction-prone soil exists at Entrada South at various depths and that mitigation would be required to reduce impact to less than significant.

The Seismic Hazard Zone Report for the Newhall Ranch 7.5-Minute Quadrangle shows portions of both VCC and Entrada South to be potentially susceptible to liquefaction, as shown in Figure 1. Further analyses by Geolabs West Lake Village (2007) and Leighton (2015a and 2015b), concluded that liquefaction mitigation should be incorporated into the proposed Entrada South and Valencia Commerce Center designs to reduce the impacts of liquefaction and dry-sand settlement to less than significant levels.

Based on our review of the existing data and analysis, we agree that seismically induced liquefaction and dry-sand settlement are hazards for both Valencia Commerce Center and Entrada South. The maximum allowable seismic differential settlement permitted by Los Angeles County (2013) is 1 inch, beyond which some form of mitigation is needed. Based on this threshold, some portions of Entrada South and Valencia Commerce Center, where the anticipated seismic differential settlement exceeds the threshold value, will require alluvium removal in accordance with Modified Project Mitigation Measure GEO-2 to reduce the hazard to less than significant levels, as prescribed by the County of Los Angeles Manual for Preparation of Geotechnical Reports. Further, in accordance with Modified Project Mitigation Measure GEO-3, a Corrective Grading Plan delineating the areas where such geotechnical conditions exist shall be prepared by a registered geotechnical engineer and submitted to the Department of Public Works. Therefore, the implementation of Modified Project Mitigation Measures GEO-2 and GEO-3 will reduce the impacts of liquefaction and dry-sand settlement to less than significant levels.

1d. The State-certified EIR concluded that, without mitigation, landslides could result in significant impacts if implementation of the 2017 Approved Project would expose people or structures to substantial adverse geological effects. The significant impact from landslide hazards would be reduced to less than significant through removal of landslide deposits, buttressing landslides in place with drained keyways, or both, similar to Mitigation Measure VCC-GEO-3 already required by the adopted VCC EIR.

The Seismic Hazard Zone Reports for the Val Verde and Newhall 7.5-Minute Quadrangles map portions of Entrada South and Valencia Commerce Center as potentially susceptible to earthquake-induced landslides. Several potential landslide areas have also been mapped, one in Valencia Commerce Center and five in Entrada South, through our geomorphic photointerpretation of stereo-paired aerial photographs. The potential landslides will require supplemental subsurface investigations to confirm the existence or absence of the potential landslides, to meet regulatory compliance standards (Section 3.5.2 of the Manual for Preparation of Geotechnical Reports, 2013). If landslides are found to exist, an assessment of the stability of the landslides must be made to demonstrate that they will not adversely affect the proposed development. A Corrective Grading Plan delineating these areas will be submitted to the County of Los Angeles Department of Public Works as required for regulatory compliance (Section 3.3.3.1 of the Manual for Preparation of Geotechnical Reports, 2013). Landslides identified on the Corrective Grading Plans are to be mitigated through stabilization, removal, and/or building setbacks. With the implementation of these corrective grading measures and the Modified Project Mitigation Measure GEO-3, we believe the impacts of potential landslides will be reduced to less than significant levels.

2. *Result in substantial soil erosion or the loss of topsoil.*

The State-certified EIR concluded that the effects of substantial soil erosion or loss of topsoil may include undermining of structures and slopes, alterations of surface drainage patterns, steepening of slopes, and loss of setback areas and safety zones, and absent mitigation, such impacts are considered significant. Corrective grading measures will be designed to remove unstable soil, stabilize potential landslide areas, and compact engineered fill to meet County of Los Angeles soil compaction requirements, resulting in a reduction of these adverse geological impacts of the 2017 Approved Project to less than significant. By following County of Los Angeles Grading Guidelines and Grading Code prescribed slope setbacks and compaction specifications, together with implementation of Modified Project Mitigation Measure GEO-3, we believe soil erosion and the loss of topsoil impacts will be reduced to less than significant levels.

3. *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.*

The State-certified EIR concluded that the effects of unstable soil, including land and structure subsidence, displacement or crushing of structures due to soil movement, loss of foundation integrity, alteration of surface drainage patterns, steepening of slopes, and loss of setback and safety zones, could result in substantial risks to life or property. Additionally, the State-certified EIR concluded that soil at Valencia Commerce Center is not conducive to liquefaction and impacts would be less than significant under Significance Threshold 3. However, as noted above, Entrada South would have some isolated liquefaction-prone soil at depth, and the thickness of the soil and depth to groundwater table are such that the potential for significant liquefaction impacts "exists." Lateral spreading hazards do not appear to be present based on the current level of geotechnical exploration.

As previously discussed, the Seismic Hazard Zone Reports for the Val Verde and Newhall 7.5-Minute Quadrangles map substantial portions of Entrada South and Valencia Commerce Center planning areas as potentially susceptible to liquefaction and earthquake-induced landslides. It is our opinion that seismicity-related ground failure, including liquefaction, landslides, and dry-sand settlement, has a potential to expose people or structures to potential substantial

adverse effects, including the risk of loss, injury, or death. A Corrective Grading Plan delineating these areas will be submitted to the County of Los Angeles Department of Public Works as required for regulatory compliance (Section 3.3.3.1 of the Manual for Preparation of Geotechnical Reports, 2013). Areas subject to these hazards are to be mitigated during corrective grading. With the implementation of these corrective grading measures and the Modified Project Mitigation Measure GEO-3, the impacts of on- and off-site potential instability will be reduced to less than significant levels.

4. *Be located on expansive soil, (defined in the Uniform Building Code Table 18-b of 1994), or corrosive soil creating substantial risks to life or property.*

The State-certified EIR concluded that expansive soil and/or corrosive soil would have significant impact, presenting a risk to the residential, commercial, infrastructure, and land uses. Reddish-brown clayey siltstone lenses in the Saugus Formation are also potentially expansive. Implementation of the 2017 Approved Project would result in a significant adverse impact without mitigation.

Section 3.5.7 of the Manual for Preparation of Geotechnical Reports requires expansion index (EI) testing on expansive soil and/or rock. Should expansive soil be encountered during earthworks, regulatory requirements state that the expansive soil shall be mitigated through implementation of geotechnical design measures to reduce hazard of constructing in expansive soil.

Previous geotechnical characterizations have identified the presence of corrosive soil. Should corrosive soil be encountered during earthworks, regulatory requirements state that the corrosive soil shall be mitigated in accordance with the CBC as a minimum, to reduce hazard of constructing in corrosive soil.

Areas subject to expansive soil and bedrock are to be mitigated during corrective grading. With the implementation of the regulatory requirements and proposed Modified Project Mitigation Measure GEO-3, impacts would be reduced to a less-than-significant level under Significance Threshold 4.

With respect to corrosive soil, Modified Project Mitigation Measure GEO-4 requires that after the site has been mass graded, soil corrosion testing shall be completed and appropriate design requirements shall be implemented in accordance with the CBC, as a minimum. With the implementation of the regulatory requirements of the CBC, and in accordance with the proposed Modified Project Mitigation Measures GEO-3 and GEO-4, the impacts of corrosive soil would be reduced to less than significant.

5. *Have soil incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems, where sewers are not available for the disposal of wastewater.*

The State-certified EIR concluded that this threshold was not applicable to the 2017 Approved Project because development facilitated in the Entrada South and Valencia Commerce Center planning areas would be served exclusively by public sewers. The Modified Project does not alter this conclusion as the facilitated development would continue to use public sewers, as previously analyzed.

6. *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; or*

The State-certified EIR concluded that the loss of access to mineral resources would not be significant under the 2017 Approved Project. The Modified Project does not alter this conclusion as the development footprint would not increase.

7. *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 map.*

See analysis for Threshold 6 above.

MITIGATION

Modified Project Mitigation Measures

The State-certified EIR did not identify any specific mitigation measures for the Entrada South or VCC planning areas, but concluded that adoption and implementation of measures similar to those previously adopted for the Newhall Ranch Specific Plan, in combination with the VCC-specific mitigation measures from the County-certified EIR, would ensure that geology and geologic hazard impacts would be less than significant. The following mitigation measures achieve an equivalent level of mitigation as the previously adopted Specific Plan measures related to geology and geologic hazards, shall apply to the Entrada South and VCC planning areas, and will ensure that potential impacts related to geology and geological hazards within the Entrada South and VCC planning areas are reduced to less than significant.

- GEO-1 Prior to the issue of building permits, all structures shall be designed using sound engineering judgment and the latest California Building Code (CBC) requirements, as a minimum, which prescribe minimum lateral forces, applied statically to each habitable structure, combined with the gravity forces of dead and live loads.
- GEO-2 Prior to issuance of rough grading permits, and in those portions of the Entrada South and VCC planning areas beneath habitable structural improvements where the anticipated seismic differential settlement exceeds the County of Los Angeles' one-inch seismic differential settlement standard, one or more of the following design requirements will be implemented:
- a. Alluvium removal to reduce liquefaction-induced settlement to less than 1 inch.
 - b. Ground improvements such as rammed aggregate piers (RAPs), deep soil mixing (DSM), or stone columns to reduce liquefaction-induced settlement to less than 1 inch.
 - c. Ground improvements such as deep dynamic compaction (DDC) or compaction grouting to reduce liquefaction-induced settlement to less than 1 inch.
 - d. Sufficiently stiff foundations or deep foundations.

- e. An approved alternative design requirement capable of reducing liquefaction induced settlement to less than 1 inch.

The above design requirements shall be performed by removing and/or improving enough liquefiable alluvium to achieve a less than 1-inch seismic differential settlement, pursuant to the County of Los Angeles Manual for Preparation of Geotechnical Reports, or by specific foundation design. Geotechnical recommendations and design requirements shall be presented and approved as a conceptual design at the 100-scale grading plan stage and as a detailed design at the 40-scale grading plan stage.

GEO-3

Prior to issuance of rough grading permit, in order to address landslides, unstable soil, liquefaction, expansive soil and dry-sand settlement, a Corrective Grading Plan delineating the areas where such geotechnical conditions exist shall be prepared by a registered geotechnical engineer and submitted to the Department of Public Works pursuant to the County of Los Angeles Manual for Preparation of Geotechnical Reports. The Corrective Grading Plan shall address the following.

- a. Project grading shall include a combination of ground modification and/or structural mitigation in areas subject to liquefaction to reduce the risk to an acceptable level (as defined by CGS in Special Publication 117a, Chapter 2, or as superseded by CGS guidance in effect at the time of implementation of this measure). Ground modification shall consist of the removal of some of the soil material subject to liquefaction and/or elevating the site grades over the material subject to liquefaction. The recommended depth of removal for mitigation of liquefaction ranges from 5 to 30 feet. Structures shall be designed to resist the anticipated static and seismic total and differential settlements.
- b. Landslides shall be stabilized and/or removed, and/or building setbacks shall be used to protect structural integrity.
- c. Grading and engineering design requirements shall address the removal of unstable soil, stabilization of potential landslide areas, and compaction of engineered fill to meet County of Los Angeles soil compaction requirements (County of Los Angeles Grading Guidelines, 2008).
- d. Areas where expansive soil is encountered shall include grading measures designed to reduce hazard of construction in expansive soil including but not limited to removing expansive soil and replacing with engineered fill, installing drainage systems, using stiffened foundations systems, or conducting engineered preparation of building pads.

GEO-4

Prior to the issue of building permits, and after the site has been mass graded, soil corrosion testing shall be completed and appropriate design requirements shall be implemented in accordance with the latest California Building Code (CBC) as a minimum, to reduce the hazard of construction in corrosive soil.

Mitigation Measures from County-Certified EIR for VCC

Mitigation measures previously adopted by the County applicable to the Modified Project's VCC planning area include VCC-GEO-1 through VCC-GEO-5, as set forth below. Italicized parentheticals are used to provide additional information and clarification regarding the implementation of a particular measure's requirements.

- VCC-GEO-1 A minimum 60-80 foot setback over the Holser Fault is part of the project design. Potential impacts from ground shaking will be mitigated by compliance with Section 2312(d) of the Los Angeles County Building Code. *(Building setbacks are no longer required within the VCC Planning Area based upon additional, subsequent geotechnical investigation reports. Building design will continue to comply with the Los Angeles County Building Code and regulatory standards for purposes of mitigating ground shaking, as required by mitigation measure GEO-1 for the Modified Project. No further action is required.)*
- VCC-GEO-2 All cut slopes will be designed at 2:1 gradients. If cut slopes are steeper than the bedding, then buttresses, retaining walls and/or stability equivalents will be provided. *(This mitigation measure is superseded by regulatory compliance, specifically compliance with the County's Grading Code and adopted Grading Guidelines (January 1, 2008). No further action is required.)*
- VCC-GEO-3 Landslides will be stabilized with shear keys and/or removal and compaction. *(This mitigation measure is superseded by mitigation measure GEO-3 for the Modified Project. No further action is required.)*
- VCC-GEO-4 Expansive bedrock will be removed and replaced with certified fill or special foundations will be designed. Fills will be designed at 2:1 gradients. *(This mitigation measure is superseded by mitigation measure GEO-3 for the Modified Project. No further action is required.)*
- VCC-GEO-5 All major canyon fills, buttresses, stability fills, shear keys, and retaining walls will require subdrains. *(This mitigation measure is superseded by regulatory compliance, specifically compliance with the County's Grading Code and adopted Grading Guidelines (January 1, 2008). No further action is required.)*

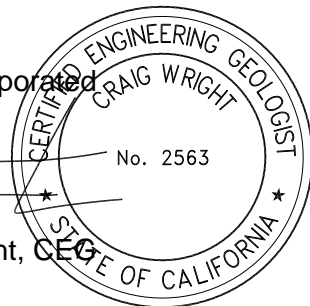

CONCLUSIONS

The Modified Project would not result in any new significant impacts or increase the severity of previously identified significant impacts related to geology and soil. The location of the Modified Project is unchanged, and geotechnical conditions on the site are unchanged. Based on 2007 and 2008 fault studies, we conclude that building setbacks from the Holser Fault, previously adopted for Valencia Commerce Center, will not be necessary. The mitigation measures identified in the State-certified EIR and supplemental corrective grading measures outlined above, provide the means to reduce Geology and Geologic Hazard impacts to less-than-significant levels.



We note that subsequent geotechnical studies have occurred since the State-certified EIR was completed, and Mitigation Measures similar to those previously adopted for the Newhall Ranch Specific Plan have been applied to the Modified Project above, in accordance with the design standards and performance objectives of the applicable regulatory framework (e.g., County building standards), and Los Angeles County Geotechnical and Materials Engineering Division review and approval. Compliance with the regulatory framework and CEQA mitigation measures would reduce geotechnical impacts to levels that are less than significant.

Sincerely,

ENGEO Incorporated



Craig S. Wright, CEG
csw/ps/ue/jf



Uri Eliahu, GE

Attachments: List of References
Figure 1 – Seismic Hazard Zone Map

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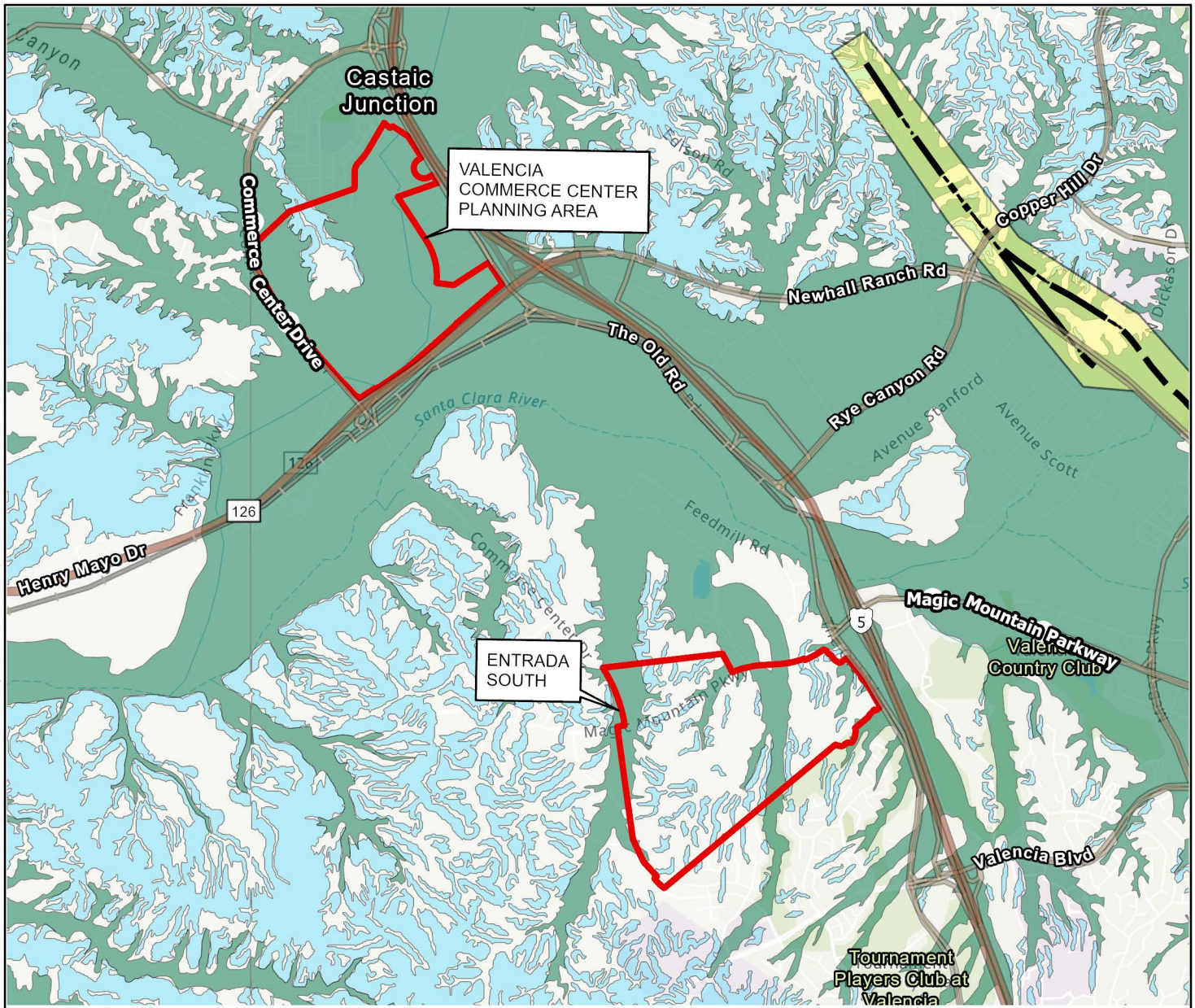
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EXPLANATION

ALL LOCATIONS ARE APPROXIMATE

- | | | | |
|-------|-----------------------|-------|-----------|
| — | ACCURATELY LOCATED | - - - | INFERRED |
| - - - | APPROXIMATELY LOCATED | — | CONCEALED |

EARTHQUAKE FAULT ZONE

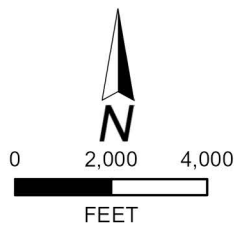
ZONE BOUNDARIES ARE DELINEATED BY STRAIGHT-LINE SEGMENTS; THE BOUNDARIES DEFINE THE ZONE ENCOMPASSING ACTIVE FAULTS THAT CONSTITUTE A POTENTIAL HAZARD TO STRUCTURES FROM SURFACE FAULTING OR CREEP SUCH THAT AVOIDANCE AS DESCRIBED IN PUBLIC RESOURCES CODE SECTION 2621.5(A) WOULD BE REQUIRED

LIQUEFACTION ZONE

AREAS WHERE THE HISTORICAL OCCURRENCE OF LIQUEFACTION, OR LOCAL GEOLOGICAL, GEOTECHNICAL AND GROUND WATER CONDITIONS INDICATE A POTENTIAL FOR PERMANENT GROUND DISPLACEMENTS SUCH THAT MITIGATION AS DEFINED IN PUBLIC RESOURCES CODE SECTION 2693(C) WOULD BE REQUIRED

EARTHQUAKE-INDUCED LANDSLIDE ZONES

AREAS WHERE THE PREVIOUS OCCURRENCE OF LANDSLIDE MOVEMENT, OR LOCAL TOPOGRAPHIC, GEOLOGICAL, GEOTECHNICAL AND SUBSURFACE WATER CONDITIONS INDICATE A POTENTIAL FOR PERMANENT GROUND DISPLACEMENTS SUCH THAT MITIGATION AS DEFINED IN PUBLIC RESOURCES CODE SECTION 2693(C) WOULD BE REQUIRED.



BASEMAP SOURCE: ESRI MAPPING SERVICE
CALIFORNIA DEPARTMENT OF CONSERVATION, CALIFORNIA GEOLOGICAL SURVEY



SEISMIC HAZARDS ZONE MAP

VALENCIA COMMERCE CENTER AND ENTRADA SOUTH

VALENCIA, CALIFORNIA

PROJECT NO. : 6538.VCC.001

SCALE: AS SHOWN

DRAWN BY: JV

CHECKED BY: UE

FIGURE NO.

1

Appendix 1b

Notice of Preparation (NOP)





Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

Entrada South and Valencia Commerce Center Project

Entrada South:
Vesting Tentative Tract Map No. 083582

Valencia Commerce Center:
Vesting Tentative Parcel Map No. 18108

NOTICE OF PREPARATION of a DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT and PUBLIC SCOPING MEETING

Project No. TBD (New Project No. Forthcoming)¹
State Clearinghouse No. 2000011025

Prepared by:

County of Los Angeles
Department of Regional Planning, Subdivisions
320 W. Temple Street, Room 1362
Los Angeles, CA 90012
Attn: Mr. Jodie Sackett

October 7, 2021

¹ The current VCC Project No. is 87-150-(5); a new Project No. for Entrada South is pending.



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

NOTICE OF PREPARATION OF A DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING

DATE: October 7, 2021

TO: State Clearinghouse, Responsible Agencies, Trustee Agencies, Organizations and Interested Parties

SUBJECT: Notice of Preparation (NOP) of a Draft Supplemental Environmental Impact Report (SEIR) in accordance with the California Environmental Quality Act (CEQA) and State CEQA Guidelines (see Public Resources Code Sections 21080.4 and 21083.9 and California Code of Regulations (CCR) Title 14, Sections 15082 and 15375).

The County of Los Angeles (County) is the Lead Agency pursuant to CEQA and intends to prepare a SEIR for the proposed Project identified below. The County has prepared this NOP and the accompanying Environmental Checklist Form (Initial Study) to provide Responsible and Trustee Agencies and other interested parties with information describing the Project, to identify the Project's potential environmental effects, and to solicit input regarding the scope and content of the environmental analysis.

AGENCIES: The County requests your agency's views on the scope and content of the environmental information relevant to your agency's statutory responsibilities in connection with the proposed Project, in accordance with State CEQA Guidelines Section 15082(b). Your agency may need to use the SEIR prepared by the County when considering any permits that your agency must issue or other approvals for the Project.

ORGANIZATIONS AND INTERESTED PARTIES: The County requests your comments and concerns regarding the environmental issues associated with construction and operation of the proposed Project.

PROJECT TITLE: Entrada South and Valencia Commerce Center (VCC) Project

PROJECT NO.: TBD (New Project No. Forthcoming)²

PROJECT LOCATION AND ENVIRONMENTAL SETTING: The Project Site is located within the northwest portion of Los Angeles County (County), west of I-5 and the City of

² The current VCC Project No. is 87-150-(5); a new Project No. for Entrada South is pending.

Santa Clarita, as show on **Figure 1, Regional Location Map**, on page 3. As shown in **Figure 2.1, Project Vicinity Map**, on page 4, the Project Site is located in an unincorporated area of the County, within the Santa Clarita Valley Planning Area (Valley Planning Area). The Project Site's location relative to the local roadway network is depicted in **Figure 2.2, Local Location and Roadway Network Map**, on page 5.

The Project Site is within the planning boundary of the State-approved Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan (RMDP/SCP), which was the subject of a State-certified Environmental Impact Report (EIR) (SCH No. 2000011025; hereafter referred to as the State-certified EIR). In the State-certified EIR for the RMDP/SCP, the Project Site is identified as the "Entrada Planning Area" and the "VCC Planning Area." The Entrada Planning Area is also sometimes referred to as Entrada South or the Entrada South Planning Area. The Project Site is adjacent to but not located within the Newhall Ranch Specific Plan area.

The Entrada Planning Area consists of approximately 382 acres and is located west of I-5 and The Old Road, on the north and south side of Magic Mountain Parkway, and south of Six Flags Magic Mountain theme park. Surrounding development and land uses include the proposed Entrada North community to the north, the City of Santa Clarita east of The Old Road and I-5, the existing community of Westridge to the south, and the Newhall Ranch Specific Plan area to the west. Within the Newhall Ranch Specific Plan area, the approved Mission Village community, which has been under development since the end of 2017, is located immediately west of the Entrada Planning Area. Additionally, the proposed Legacy Village community is located to the southwest.

The VCC Planning Area consists of approximately 321 acres in an undeveloped portion of the partially completed VCC industrial/business park center and is located west of I-5 and The Old Road, north of SR-126, and east of Commerce Center Drive and the Chiquita Canyon landfill. The VCC Planning Area is surrounded by existing single-family residential and industrial uses to the north, existing industrial uses to the east, the proposed Entrada North community to the south, and Chiquita Canyon Landfill to the west.

PROJECT DESCRIPTION: The Entrada South and VCC Project implements the development within the Entrada and VCC Planning Areas facilitated by the approved RMDP/SCP and analyzed in the State-certified EIR. The California Department of Fish and Wildlife (CDFW) certified the State-certified EIR in June 2017, at which time it also approved the RMDP/SCP and related State permits. Los Angeles County was a responsible agency for the RMDP/SCP and participated in the State-certified EIR process through the receipt and review of the Draft and Final EIRs as well as the Draft and Final Additional Environmental Analysis and the submittal of comments, which were addressed by CDFW. The Entrada South and VCC Project is consistent with the One Valley One Vision (OVOV) Area Plan's projected buildout and land use designations, as evaluated in the OVOV EIR and approved by the County.

The proposed Entrada South and VCC Project reflects limited changes and refinements to the development of the Entrada and VCC Planning Areas, as compared to the development evaluated in the State-certified EIR. As such, the Entrada South and VCC Project is referred to herein as the "Modified Project." A Supplemental EIR, tiered from the State-certified EIR, will be prepared by

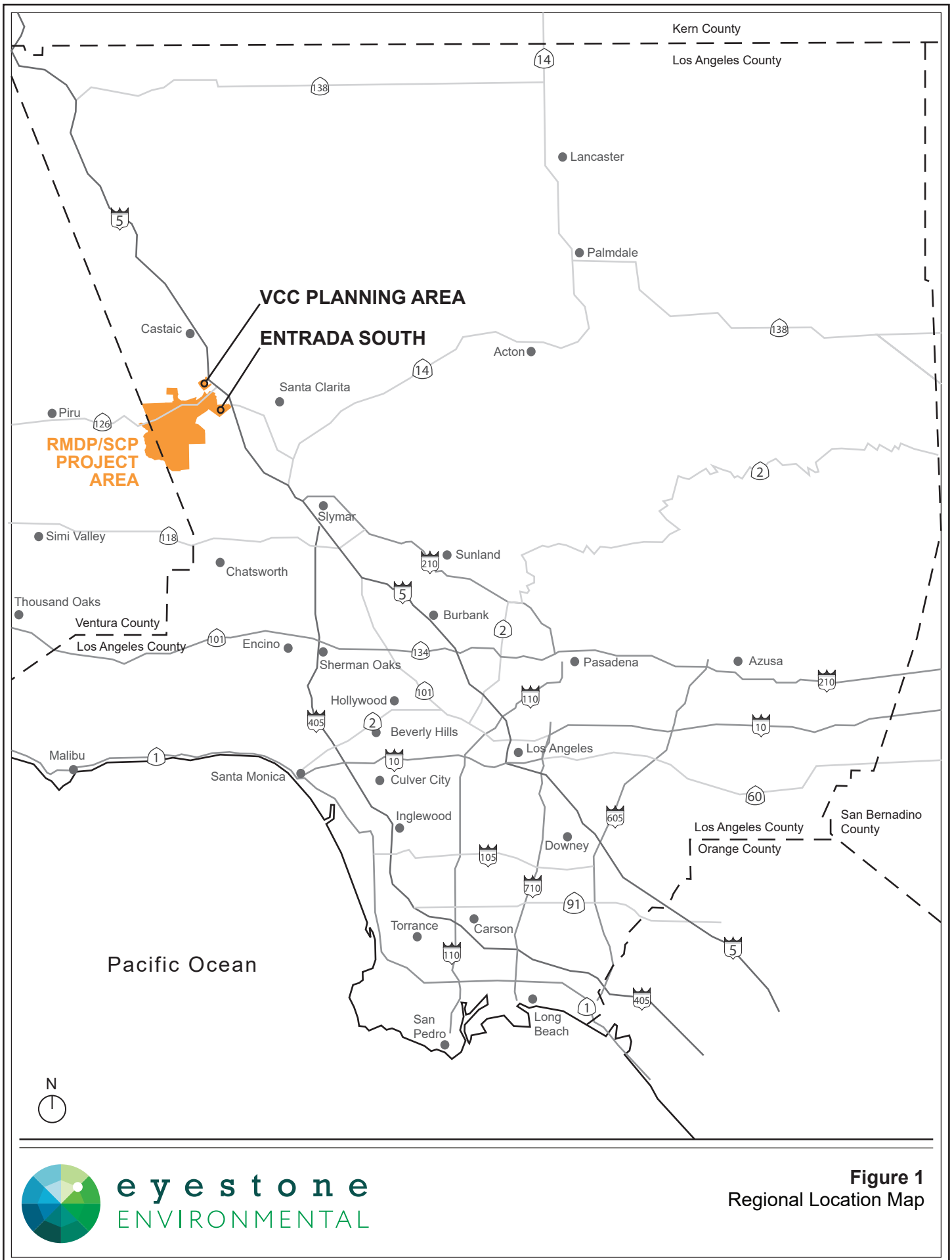


Figure 1
Regional Location Map

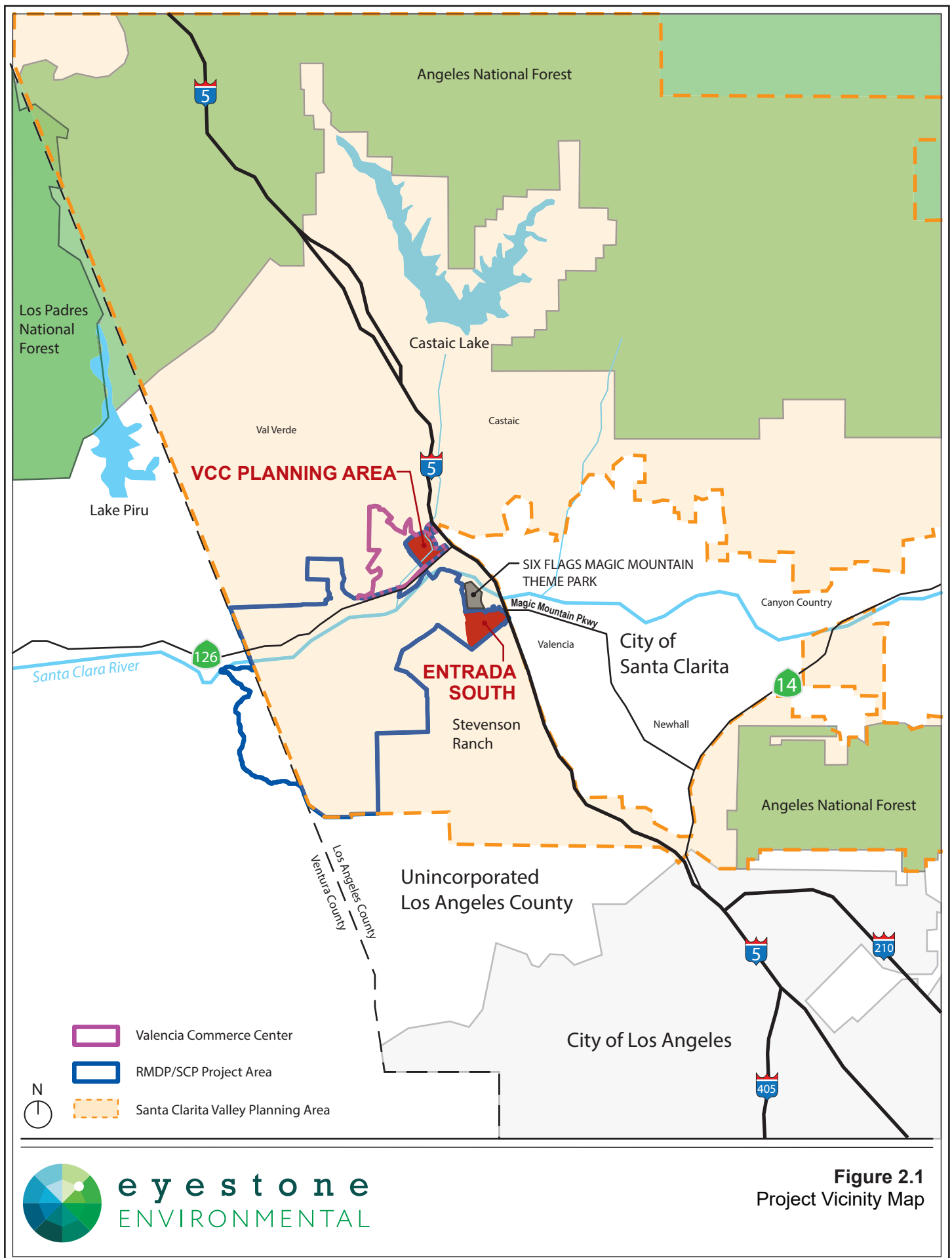


Figure 2.1
Project Vicinity Map

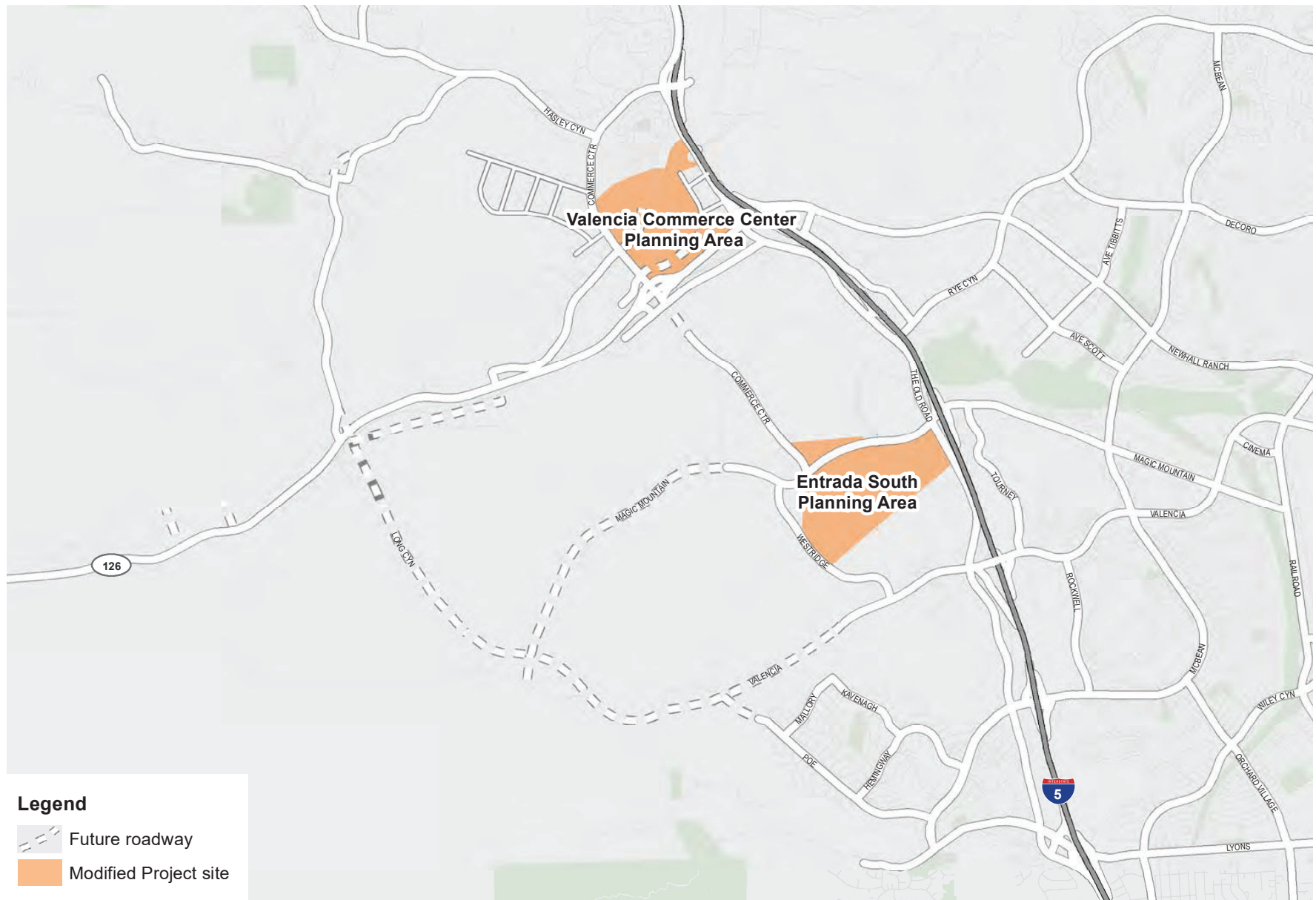


Figure 2.2
Local Location and Roadway Network Map

the County as the CEQA lead agency for the Modified Project. The Supplemental EIR will allow the County, as the CEQA lead agency, and other agencies as CEQA responsible agencies, to consider additional discretionary entitlements needed to complete development of the Entrada and VCC Planning Areas under the Modified Project.

The Modified Project includes enhanced environmental protections for each planning area, as described below and in more detail in the Initial Study. A summary of the Modified Project refinements to the balance of residential and non-residential development is shown in the following table.

Planning Area/ Land Use	State-Certified EIR Approved Project	Modified Project	Difference
<i>Entrada South Planning Area</i>			
Residential Units	1,725	1,574 (to comply with OVOV Area Plan)	- 151
Non-Residential	450,000 SF	730,000 SF	+ 280,000 SF
<i>VCC Planning Area</i>			
Residential Units	0	0	0
Non-Residential	3,400,000 SF	3,400,000 SF	0

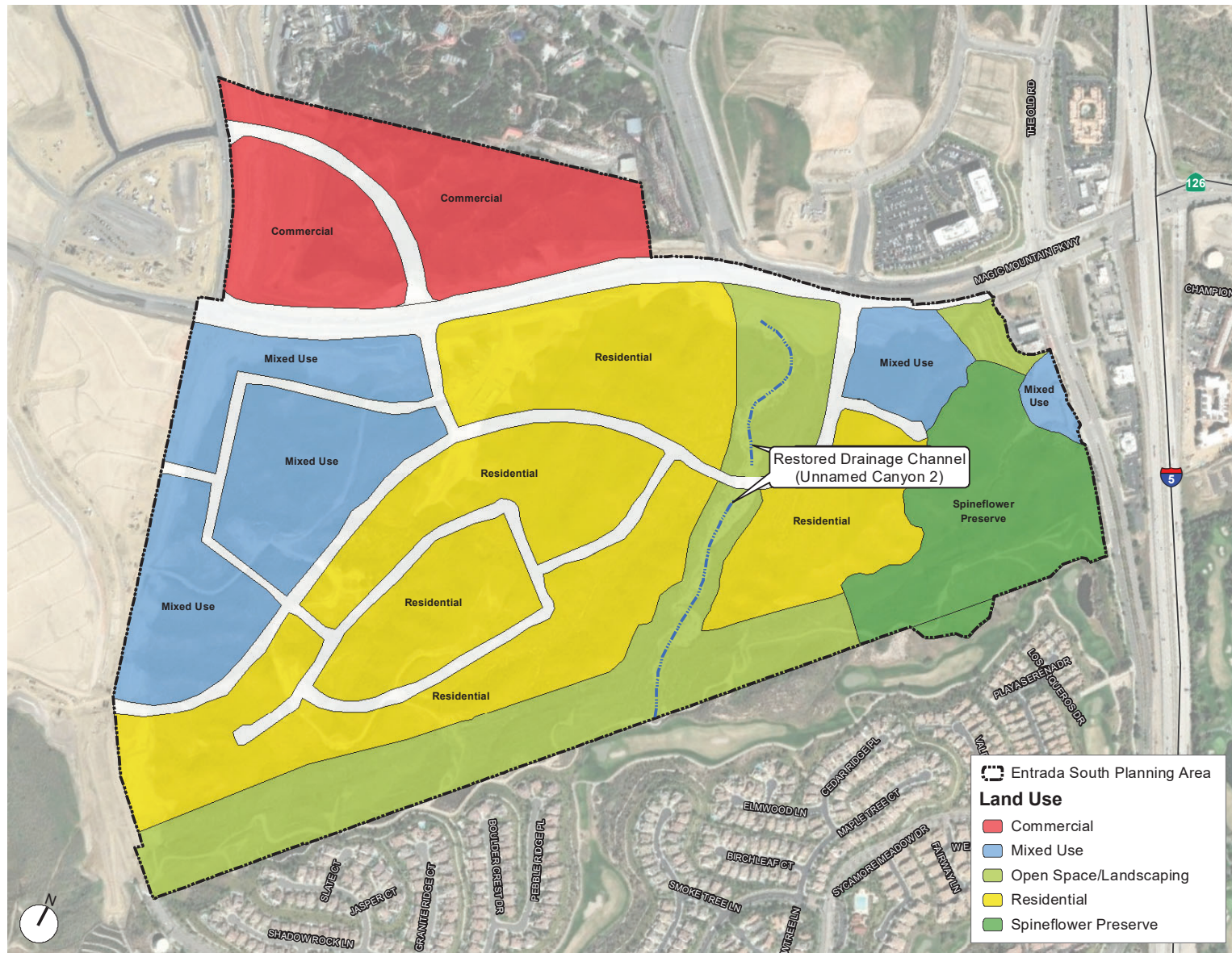
Entrada Planning Area

The Conceptual Land Use Plan for the Entrada Planning Area is shown in **Figure 3, Conceptual Land Use Plan—Entrada South**, on page 7. The proposed minor changes and refinements under the Modified Project, as compared to the 2017 Approved Project analyzed in the State-certified EIR, include:

Enhanced Environmental Protections

The Modified Project increases environmental protections to wetlands and related biological resources within the Entrada Planning Area. The Modified Project enhances and restores portions of a drainage channel referred to as Unnamed Canyon 2. With the proposed design refinements, portions of Unnamed Canyon 2—from the storm drain outlet at the southern Entrada boundary to Magic Mountain Parkway—would be enhanced and restored as a natural, open, vegetated drainage channel with grade control structures that would generally retain the look and feel of a natural drainage, thus reducing permanent impacts to biological resources and jurisdictional waters and providing additional open space within the developed portions of the Project Site. This environmentally beneficial modification would result in increased open space, restored drainage areas, and habitat for species as compared to that evaluated in the State-certified EIR.³

³ As part of the Modified Project's environmental enhancements within Entrada South, temporary disturbance of a 0.6-acre previously disturbed golf course area within The Oaks Club at Valencia golf course, which is located off-site and immediately south of Entrada South within the Westridge community, is required to accommodate a necessary storm drain connection. This previously-disturbed golf course area would experience temporary impacts during a brief construction period and would be revegetated and restored as a portion of the golf course following completion of the storm drain connection associated with Unnamed Canyon 2.



Refinements to the Balance of Residential and Non-Residential Development

The State-certified EIR for the 2017 Approved Project evaluated the environmental impacts of 1,725 dwelling units, 450,000 square feet of non-residential development, a public facilities area for a neighborhood park and a potential school site, private recreational amenities, a spineflower preserve, and trails and infrastructure within the Entrada Planning Area. The Modified Project includes 1,574 dwelling units (including affordable housing units consistent with the County's Inclusionary Housing Ordinance or a potential Development Agreement), 730,000 square feet of non-residential development, a neighborhood park and potential school site, a spineflower preserve, and trails and infrastructure within the Entrada Planning Area. The refinements to the land use plan for Entrada South ensure consistency with the density of residential units allowed under the OVOV Area Plan land use designation for Entrada South. As such, this analysis considers the environmental implications of reducing the number of residences by 151 units and increasing the amount of non-residential development by 280,000 square feet. These refinements do not substantially change the scope of the Entrada South land use plan when comparing the Modified Project to the 2017 Approved Project. Non-residential development could include any allowable uses consistent with the zoning designation, including but not limited to commercial, office, retail, and hotel uses. If a school site is not ultimately needed in Entrada South, that area would become available for residential development provided the overall number of allowable units (1,574 dwelling units) is not exceeded.

VCC Planning Area

As relevant background, VCC was approved for development by Los Angeles County through the issuance of various entitlements and certification of an EIR (SCH No. 1987-123005) in 1991, which is incorporated by reference. The existing VCC entitlement approved by the County allows approximately 12.6 million square feet of industrial/business park space at build-out, of which approximately 9 million square feet has been constructed. The VCC Planning Area evaluated herein as part of the Modified Project is comprised of approximately 3.4 million square feet of industrial/business park space within the County-approved and partially completed VCC industrial/business park center. Following the County-certified VCC EIR, development of the undeveloped portion of the VCC Planning Area was also analyzed in the State-certified EIR, with up to 3.4 million square feet of non-residential development that would be facilitated by the RMDP/SCP. Under the Modified Project and consistent with the State-certified EIR, the VCC Planning Area would be developed consistent with the uses allowed by the County-approved VCC entitlements and existing zoning. Thus, the Modified Project does not propose any new or additional buildout of the VCC Planning Area beyond what was analyzed in the State-certified EIR, and the Modified Project would not result in any buildout of VCC beyond the County-approved existing VCC entitlements.

The Conceptual Land Use Plan for the VCC Planning Area is shown in **Figure 4, Conceptual Land Use Plan—VCC Planning Area**, on page 9. The proposed minor changes and refinements under the Modified Project, as compared to the 2017 Approved Project analyzed in the State-certified EIR, include:

Enhanced Environmental Protections

The only proposed changes and refinements within the VCC Planning Area are comprised of additional environmental protections. Specifically, to provide increased environmental protections



Figure 4
Conceptual Land Use Plan – VCC Planning Area

to wetlands and related biological resources within the VCC Planning Area, the Modified Project involves a reduction in permanent impacts to Hasley Creek and Castaic Creek (such areas may be temporarily impacted during construction, as analyzed in the State-certified EIR, but would be restored and revegetated after construction based on the Modified Project design) which traverse the VCC Planning Area, including a reduction of permanent impacts to certain vegetation communities and jurisdictional stream habitat. This environmentally beneficial modification would result in increased open space, restored drainage areas, and habitat for species.

The Modified Project is an example of sustainable development that achieves net zero greenhouse gas emissions. The Modified Project includes applicable mitigation measures from the State-certified EIR, including 13 mitigation measures related to greenhouse gas impacts that would reduce the Project's greenhouse gas emissions to net zero and are identical to those imposed on the 2017 Approved Project in accordance with the State-certified EIR. These mitigation measures went through extensive review and refinement as a part of the State-certified EIR, including review by the California Air Resources Board, the State authority on climate policy.

For additional information about the Project, please refer to the Initial Study.

Under CEQA, when evaluating project changes relative to a previously certified EIR, the additional CEQA analysis shall focus solely on the incremental changes in the project, changes in circumstances, or new information since the certification of the prior EIR.

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED (E.G., PERMITS, FINANCING APPROVAL, OR PARTICIPATION AGREEMENT): Below is a list of permits and approvals which are known to be needed, or may be needed, to implement various Project components in the future:

Implementation of the Modified Project requires County entitlements to be submitted, reviewed, and approved in accordance with the Los Angeles County Subdivision Ordinance and the California Subdivision Map Act, consistent with the County General Plan, the Santa Clarita Valley Area Plan: One Valley One Vision 2012 (OV OV Area Plan), and Los Angeles County Code Titles 21 and 22, Zoning and Subdivision Ordinances. Potential entitlements include a zone change and vesting tentative tract map (Entrada South), tentative parcel map (VCC), conditional use permit (Entrada South), oak tree permits, parking permits, development agreement(s) and such other approvals, as needed, ministerial or otherwise, which the County has determined are necessary to develop the Entrada Planning Area. The Modified Project may also require a Streambed Alteration Agreement from CDFW, a Section 401 Certification from the Los Angeles Regional Water Quality Control Board (RWQCB) or alternatively, waste discharge requirements, Army Corps permits, and other approvals from responsible agencies, as applicable.

APPLICANT: The Newhall Land and Farming Company, a California Limited Partnership, an indirect subsidiary of Five Point Holdings, LLC, 25124 Springfield Court, Suite 300, Valencia, CA 91355.

POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROJECT: Based on a preliminary review of the Modified Project consistent with CCR Title 14, Section 15060, the County has determined that a SEIR should be prepared. Consistent with CCR Title 14, Sections 15063 and 15082, the County has identified the following probable environmental effects of the Modified

Project, which will be addressed in the SEIR for the Modified Project:

- Air Quality
- Biological Resources and Jurisdictional Waters
- Cultural Resources
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

These potential environmental effects are described in greater detail in the Initial Study prepared for the Modified Project. Alternatives will be evaluated to reduce environmental impacts that may be identified during the SEIR process. To provide a complete record of the County's environmental decision-making, environmental issues that do not rise to a level of significance will be addressed in the SEIR in a separate section entitled "Impacts Found to Be Less than Significant."

NOTICE OF SCOPING MEETING: The County will conduct a public scoping meeting for the purpose of soliciting oral and written comments from interested parties as to the appropriate scope and content of the SEIR.

All interested parties are invited to attend the scoping meeting to assist in identifying issues to be addressed in the EIR. The scoping meeting will include a brief presentation of the project to be addressed in the EIR and will provide attendees with an opportunity to provide input to the scope of the EIR. The virtual Scoping Meeting will be held online **Tuesday, October 19, 2021, at 6PM (Pacific Time)**, via **ZOOM** at the following link:

<https://zoom.us/j/92075537467>

Webinar ID: 920 7553 7467

Dial in only option (no video):
(669) 900-6833

Webinar ID: 920 7553 7467

Translation in other languages can be made available at the meeting upon request. Please submit translation requests at least seven business days in advance of each scheduled meeting to subdivisions@planning.lacounty.gov.

PUBLIC REVIEW PERIOD: In accordance with State CEQA Guidelines Section 15082(b), the comment period for the NOP begins on October 7, 2021, and ends on November 8, 2021.

Any comments provided should identify specific topics of environmental concern and your reason for suggesting the study of these topics in the SEIR.

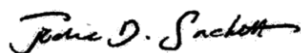
DOCUMENT AVAILABILITY: The NOP and Initial Study are available for public review at the Los Angeles County Department of Regional Planning web addresses listed below and the following locations:

- Valencia Library, 23743 W. Valencia Boulevard, Santa Clarita
- Castaic Library, 27971 Sloan Canyon Road, Castaic
- Stevenson Ranch Library, 25950 The Old Road, Stevenson Ranch
- Old Town Newhall Library, 24500 Main Street, Santa Clarita
- Canyon Country Jo Anne Darcy Library, 18601 Soledad Canyon Road, Santa Clarita

The public is also encouraged to visit the Department of Regional Planning's website to review the Initial Study at: <https://planning.lacounty.gov/case/view/pm18108> (Valencia Commerce Center) and <https://planning.lacounty.gov/case/view/tr083582> (Entrada South). The State-certified EIR for the RMDP/SCP is available at <https://planning.lacounty.gov/case/view/rmdp>.

Thank you for your participation in the environmental review of this project. Please direct all written comments to the following address:

Mr. Jodie Sackett
Subdivisions
Department of Regional Planning
County of Los Angeles
320 W. Temple Street, Room 1362
Los Angeles, CA 90012
Tel: (213) 974-6433
Fax: (213) 626-0434
Email: subdivisions@planning.lacounty.gov



Signature of Lead Agency Representative

9-30-21

Date

Appendix 1c

NOP Comment Letters



From: Lin, Alan S@DOT
Sent: Monday, November 8, 2021 4:08 PM
To: OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>
Cc: subdivisions@planning.lacounty.gov; ihuntington@planning.lacounty.gov; geven@dpw.lacounty.gov
Subject: SCH # 2000011025-Entrada South and Valencia Commerce

Attached please see Caltrans comment letter.

Alan Lin, P.E.
Transportation Engineer, Civil
IGR, Division of Planning
State of California
Department of Transportation
Mail Station 16
100 South Main Street
Los Angeles, CA 90012
213-269-1124 Mobile

DEPARTMENT OF TRANSPORTATION

DISTRICT 7

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 269-1124

FAX (213) 897-1337

TTY 711

www.dot.ca.gov

*Making Conservation
a California Way of Life*

November 8, 2021

Mr. Jodie Sackett
Subdivisions
Department of Regional Planning
County of Los Angeles
320 West Temple Street, Room 1362
Los Angeles, CA 90012

RE: Entrada South and Valencia Commerce
Center Project
SCH # 2000011025
Vic. LA-05/PM R54.38-R56.61,
LA-126/PM R4.87
GTS # LA-2021-03727-NOP

Dear Mr. Sackett:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced recirculated NOP. The Entrada South Planning Area consists of approximately 382 acres located west of I-5 and The Old Road, both north and south of Magic Mountain Parkway, and south of Six Flags Magic Mountain theme park in the Santa Clarita Valley. The Entrada South Project includes 1,574 dwelling units, 730,000 square feet of non-residential development, a neighborhood park and potential school site, a spine flower preserve, trails, roadways, and infrastructure. The Valencia Commerce Center Planning Area consists of approximately 321 acres in an undeveloped portion of the partially completed VCC industrial/business park center located west of I-5 and north of Henry Mayo Drive (SR-126). The VCC Project includes approximately 3.4 million square feet of industrial/business park space, a multi-purpose trail, roadways, and infrastructure. This project has a long history since 2000 with past certified EIR.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<http://opr.ca.gov/ceqa/updates/guidelines/>

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, this development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and

Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared in On December 18, 2020. You can review these resources at the following links:

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisq-a11y.pdf>

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>

Caltrans encourages lead agencies to prepare traffic safety impact analysis for this development in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

In the spirit of mutual cooperation, we would like to invite the Lead Agency, developer, and consultants for a scoping meeting before the environmental document preparation. If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2021-03727AL-NOP.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

email: State Clearinghouse

From: Sarajian, Kylee@DOC <Kylee.Sarajian@conservation.ca.gov>
Sent: Monday, November 22, 2021 4:19:54 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Cc: OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>; OLRA@DOC <OLRA@conservation.ca.gov>; Wright, Tharon@DOC <Tharon.Wright@conservation.ca.gov>; LaForge, Justin@DOC <Justin.LaForge@conservation.ca.gov>
Subject: CalGEM CSWR Report 1012357

CAUTION: External Email. Proceed Responsibly.

Hello,

Please see attached report and contact Mr. Justin LaForge Justin.LaForge@conservation.ca.gov should you have any questions.

Thank you,



Kylee Sarajian

Office Technician | California Geologic
Energy Management Division

California Department of Conservation

195 S Broadway, Suite 101, Orcutt, CA 93455

P: (805) 937-7246

E: kylee.sarajian@conservation.ca.gov



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California
Department of Conservation
Geologic Energy Management Division

Gavin Newsom, Governor
David Shabazian, Director
801 K Street, MS 18-05
Sacramento, CA 95814
T: (916) 445-9686

11/16/2021

County: Los Angeles - Department of Regional Planning
Jodie Sackett
320 W Temple St, Room 1362, Los Angeles, CA 90012, USA
subdivisions@planning.lacounty.gov

Construction Site Well Review (CSWR) ID: 1012357

Assessor Parcel Number(s): 2826008039, 2826008044, 2826009106, 2866001001, 2866002045,
2866002052, 2866002061, 2866002063, 3271001038

Property Owner(s): County of Los Angeles

Project Location Address: Santa Clarita California 91355

Project Title: Entrada South and Valencia Commerce Center (VCC) Project SCH Number 2000011025

Public Resources Code (PRC) § 3208.1 establishes well reabandonment responsibility when a previously plugged and abandoned well will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near oil, gas, and geothermal wells.

The California Geologic Energy Management Division (CalGEM) has received and reviewed the above referenced project dated 10/12/2021. To assist local permitting agencies, property owners, and developers in making wise land use decisions regarding potential development near oil, gas, or geothermal wells, the Division provides the following well evaluation.

The project is located in Los Angeles County, within the boundaries of the following fields:

Castaic Junction (ABD), Any Field

All wells reviewed within the project parcels are interpreted to have future access impeded by this

project. If plans become available that demonstrate that access to oil and gas wells will be maintained, please file them with this office.

Our records indicate there are 14 known oil or gas wells located within the project boundary as identified in the application.

- Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 14
- Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 0
- Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 0
- Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 0

The Division categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure.

There are no guarantees a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. It always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. The Division acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no guarantees that such abandonments will not leak.

The Division advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations should be provided to the Division in Latitude and Longitude, NAD 83 decimal format. The Division expects any wells found leaking to be reported to it immediately.

Failure to plug and reabandon the well may result in enforcement action, including an order to perform

reabandonment well work, pursuant to PRC § 3208.1, and 3224.

PRC § 3208.1 give the Division the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment, or if the well is not accessible or visible. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for reabandonment as:

1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to reabandon the well and be responsible for the reabandonment.
2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be reabandoned, or to follow the advice of the supervisor or district deputy not to undertake the construction, then the person or entity causing the construction over or near the well shall obtain all rights necessary to reabandon the well and be responsible for the reabandonment.
3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the reabandonment.

No well work may be performed on any oil, gas, or geothermal well without written approval from the Division. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. The Division also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR §1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below grade. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from the Division is required before work can start.

The Division makes the following additional recommendations to the local permitting agency, property owner, and developer:

1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, the Division recommends that information regarding the above identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.
2. The Division recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

As indicated in PRC § 3106, the Division has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to the Division's authority to order work on wells pursuant to PRC §§ 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC §§ 3236, 3236.5, and 3359 for violations within the Division's jurisdictional authority. The Division does not regulate grading, excavations, or other land use issues.

If during development activities, any wells are encountered that were not part of this review, the property owner is expected to immediately notify the Division's construction site well review engineer in the Coastal district office, and file for Division review an amended site plan with well casing diagrams. The District office will send a follow-up well evaluation letter to the property owner and local permitting agency.

Should you have any questions, please contact me at (504) 425-7710 or via email at Miguel.Cabrera@conservation.ca.gov.

Sincerely,

Miguel Cabrera
Miguel Cabrera
Northern District Deputy

cc: Jodie Sackett - Plan Checker

Wells Not Abandoned to Current Division Requirements as Prescribed by Law & Projected to be Built Over or Have Future Access Impeded

The wells listed below are not abandoned to current Division requirements as prescribed by law, and based upon information provided, are projected to be built over or have future access impeded. **The Division expects these wells to be reabandoned in compliance with current California law, prior to development activities.**

API	Well Designation	Operator	Well Evaluations
0403716505	Newhall Land & Farming Co. 35	The Newhall Land and Farming Company, LLC	Based on the well records: 1. Oil and gas zone plug does not meet regulation (CCR § 1723.1). 2. Freshwater plug does not meet regulation (CCR § 1723.2).
0403716501	Newhall Land & Farming Co. 31	The Newhall Land and Farming Company, LLC	Based on the well records: 1. Freshwater plug does not meet regulation (CCR § 1723.2).
0403706353	Newhall Land & Farming Co. 36	The Newhall Land and Farming Company, LLC	Based on the well records: 1. Freshwater plug does not meet regulation (CCR § 1723.2).
0403706354	Newhall Land & Farming Co. 44	The Newhall Land and Farming Company, LLC	Based on the well records: 1. Freshwater plug does not meet regulation (CCR § 1723.2).
0403716506	Newhall Land & Farming Co. 38	The Newhall Land and Farming Company, LLC	Based on the well records: 1. Freshwater plug does not meet regulation (CCR § 1723.2).
0403713506	Newhall Land & Farming Co. 37	The Newhall Land and Farming Company, LLC	Based on the well records: 1. Oil and gas zone plug

			does not meet regulation (CCR § 1723.1).
0403716500	Newhall Land & Farming Co. 30	The Newhall Land and Farming Company, LLC	Based on the well records: 1. Freshwater plug does not meet regulation (CCR § 1723.2).
0403713527	Newhall Land & Farming Co. 51	The Newhall Land and Farming Company, LLC	Based on the well records: 1. Oil and gas zone plug does not meet regulation (CCR § 1723.1). 2. Freshwater plug does not meet regulation (CCR § 1723.2).
0403716510	Newhall Land & Farming Co. 43	The Newhall Land and Farming Company, LLC	Based on the well records: 1. Freshwater plug does not meet regulation (CCR § 1723.2).
0403706355	Newhall Land & Farming Co. 47	The Newhall Land and Farming Company, LLC	Based on the well records: 1. Oil and gas zone plug does not meet regulation (CCR § 1723.1). 2. Freshwater plug does not meet regulation (CCR § 1723.2).
0403721702	Newhall Land & Farming Co. 1	Dekalb Energy Co.	Based on the well records: 1. Oil and gas zone plug does not meet regulation (CCR § 1723.1). 2. Freshwater plug does not meet regulation (CCR § 1723.2). 3. Casing shoe plug does not meet regulation (CCR § 1723.3).
0403724219	N.L.&F. Magic Mountain	Seneca Resources	Based on the well

	1	Company, LLC	records: 1. Freshwater plug does not meet regulation (CCR § 1723.2).
0403705490	Newhall Land & Farming Co. B-1	The Newhall Land and Farming Company, LLC	Based on the well records: 1. Oil and gas zone plug does not meet regulation (CCR § 1723.1). 2. Freshwater plug does not meet regulation (CCR § 1723.2). 3. Surface plug does not meet regulation (CCR § 1723.5).
0403706109	Newhall D-2	The Newhall Land and Farming Company, LLC	Based on the well records: 1. Oil and gas zone plug does not meet regulation (CCR § 1723.1). 2. Freshwater plug does not meet regulation (CCR § 1723.2). 3. Surface plug does not meet regulation (CCR § 1723.5).

From: Leatherman, Nicole@Wildlife <Nicole.Leaherman@Wildlife.ca.gov>
Sent: Tuesday, November 9, 2021 12:43 AM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Cc: Wilson-Olgin, Erinn@Wildlife <Erinn.Wilson-Olgin@wildlife.ca.gov>; Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>; Portugal, Julisa@Wildlife <Julisa.Portugal@Wildlife.ca.gov>; Kwan-Davis, Ruby@Wildlife <Ruby.Kwan-Davis@Wildlife.ca.gov>; Silva, Felicia@Wildlife <Felicia.Silva@Wildlife.ca.gov>; Hailey, Cindy@Wildlife <Cindy.Hailey@wildlife.ca.gov>; Wildlife CEQA Comment Letters <CEQACCommentLetters@wildlife.ca.gov>; state.clearinghouse@opr.ca.gov <state.clearinghouse@opr.ca.gov>
Subject: CDFW Comments on Entrada South NOP

CAUTION: External Email. Proceed Responsibly.

Good afternoon,

Please see the attached letter regarding California Department of Fish and Wildlife's comments on the Entrada South and Valencia Commerce Center Project Notice of Preparation in the County of Los Angeles. If you have any questions or concerns relating to this letter, please feel free to contact CDFW at your convenience.

Thank you for the opportunity to comment and have a good day.

Nicole Leatherman

Environmental Scientist

California Department of Fish and Wildlife

4665 Lampson Avenue, St C

Los Alamitos California 90720

Cell: 858-761-8020



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

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



BY EMAIL ONLY

November 8, 2021

Jodie Sackett
County of Los Angeles
Department of Regional Planning
320 W. Temple Street, Room 1362
Los Angeles, CA 90012
subdivisions@planning.lacounty.gov

Subject: Notice of Preparation of a Draft Supplemental Environmental Impact Report for the Entrada South and Valencia Commerce Center Project, SCH # 2000011025, County of Los Angeles

Dear Mr. Sackett:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) of a draft Supplemental Environmental Impact Report (SEIR) by the County of Los Angeles (County) for the Entrada South and Valencia Commerce Center (VCC) Project (Project). The NOP's supporting documents included a Project Initial Study, Appendix IS-1, Appendix IS-2, and Appendix IS-3. CDFW appreciates the opportunity to provide comments regarding aspects of the Project that could affect fish and wildlife resources and be subject to CDFW's regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is submitting comments as the trustee agency for the State's fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a), 1802; Pub. Resources Code, § 21070; Cal. Code Regs., tit. 14, § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Fish & G. Code, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect the State's fish and wildlife resources.

CDFW is also submitting comments as a potential responsible agency under CEQA (Pub. Resources Code, § 21069; Cal. Code Regs., tit. 14, § 15381) because the Project might require a permit from CDFW in the form of a streambed alteration agreement under Fish and Game Code section 1602 and/or of take authorization under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) and the Native Plant Protection Act (Fish & G. Code, § 1900 et seq.). CDFW expects the Project proponent to obtain appropriate authorization for the Project under the Fish and Game Code from CDFW.

Conserving California's Wildlife Since 1870

Jodie Sackett
County of Los Angeles
November 8, 2021
Page 2 of 6

Project Description and Summary

Objective: The Entrada Planning Area consists of approximately 382 acres and the VCC Planning area consists of approximately 321 acres for a total of 703 acres. The NOP evaluates proposed development of the Project site, including 339 single-family residences; 1,235 multi-family residences; 730,000 square feet of commercial use; and a 9.4-acre elementary school. Facilities and infrastructure proposed as part of the Project include a network of roads and trails, drainage and water quality improvements.

In June 2017, CDFW, acting as lead agency, certified the final Environmental Impact Report (EIR) (SCH No. 2000011025) the County intends to supplement for the Project. The EIR evaluated the Newhall Ranch Resource Management and Development Plan and the Spineflower Conservation Plan (RMDP/SCP). The Project site is within the planning boundary of the RMDP/SCP and reflects changes and refinements to the planned development as compared to the EIR.

Entrada South

The Project as described in the SEIR plans to reduce the number of residential units from the EIR from 1,725 units to 1,574 units. This Project will also increase the non-residential square footage from 450,000 to 730,000 square feet. The Project also includes enhanced environmental protections by designating Unnamed Canyon 2 as open space. Unnamed Canyon 2 would be enhanced and restored with grade control structures and the addition of a storm drain connection.

VCC

The Project as described in the SEIR involves a reduction of permanent impacts to streams, vegetation communities, and the fish and wildlife resources in Hasley Creek and Castaic Creek. This reduction includes a development setback from Castaic Creek. The Project does not propose any new or additional buildout of the VCC Planning area beyond what was analyzed in the EIR.

Location: The Project site consists of undeveloped land within the Entrada and VCC Planning Areas analyzed in the EIR. More specifically, the Project is located within the northwest portion of Los Angeles County, west of I-5 and the City of Santa Clarita, on the north and south side of Magic Mountain Parkway, and south of Six Flags Magic Mountain theme park.

Comments and Recommendations

CDFW offers the following comments and recommendations below to assist the County in adequately identifying, avoiding, and mitigating the Project's significant, or potentially significant, direct and indirect impacts on biological resources. The SEIR should provide adequate and complete disclosure of the Project's potential impacts on biological resources. (Pub. Resources Code, § 21061; Cal. Code Regs., tit. 14, §§ 15003, subd. (i), 15151.) CDFW looks forward to commenting on the draft SEIR when it becomes available.

Specific Comments

Jodie Sackett
County of Los Angeles
November 8, 2021
Page 3 of 6

- 1) Jurisdictional Waters. The Initial Study acknowledges that the Project site includes multiple drainages including Hasley Creek, Castaic Creek, Magic Mountain Canyon tributary, and other unnamed drainages. Project activities would impact streams through activities including (but not limited to) fill of Magic Mountain Canyon tributary and other unnamed drainages, bank stabilization along Castaic Creek, and construction of creek crossings across an unnamed drainage and Hasley Creek, as shown in the Conceptual Land Use Plans on pages 20 and 22.

CDFW recognizes the Project proponent's efforts through the SEIR to significantly reduce impacts to streams and their associated fish and wildlife resources and enhance stream habitats where feasible. In addition, CDFW continues to coordinate closely with the Project proponent to further reduce impacts to Castaic Creek and other streams.

- a) Where development might occur near a stream but avoid impacts, the SEIR should provide a justification as to why a chosen setback distance of the proposed development would be effective to avoid impacts on streams and associated vegetation.
 - b) The SEIR should provide a stream delineation and analysis of impacts. CDFW recommends the SEIR discuss whether impacts on streams within the Project site would impact those streams immediately outside of the Project site where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed.
 - c) CDFW requests a hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project site. Additionally, the hydrological evaluation should assess a range of sufficient flood event frequencies (such as the 100-, 50-, 25-, 10-, 5-, or 2-year frequency flood events) to evaluate existing and proposed conditions and erosion/scour potential. CDFW recommends the SEIR discuss the results and address avoidance, minimization, and mitigation measures that may be necessary to reduce potential significant impacts.
 - d) Stream crossings should be engineered and maintained in a manner that does not cause erosion or aggradation within the stream. Stream crossings should be engineered so that base flows for the watershed pass uninterrupted and the crossing structure withstands large storm events. CDFW recommends all stream crossings be designed in a manner consistent with the RMDP/SCP to minimize impacts to biological resources.
- 2) Analysis of Effects on Mountain Lion (*Puma concolor*). The mountain lion is a specially protected mammal in the State (Fish and G. Code, § 4800). In addition, on April 21, 2020, the California Fish and Game Commission accepted a petition to list an evolutionarily significant unit of mountain lion in southern coastal California as threatened under CESA (CDFW 2020). As a CESA candidate species, unauthorized take of mountain lion in southern California is prohibited.

The Project area is within or adjacent to the Santa Susana Mountains where an evolutionarily significant unit of mountain lion in southern coastal California occurs (Riley 2014). Indirect impacts on mountain lion could result from habitat loss and increased human presence, traffic, noise, and artificial lighting. For example, as human population and

Jodie Sackett
 County of Los Angeles
 November 8, 2021
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communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions and people (CDFW 2013). As a result, the need to relocate or humanely euthanize mountain lions (depredation kills) may increase for public safety. Indirect impacts on mountain lion could also result from increased vehicle traffic and lighting, which could lead to increased wildlife injury or mortality from vehicle strikes and deter wildlife from using otherwise suitable habitat.

The EIR evaluated the Project's potential direct and indirect impacts to mountain lion and concluded impacts to mountain lion would be not significant including the required mitigation.

- a) Analysis and Disclosure: The SEIR should discuss the Project's potential impacts on mountain lion and habitat. Impacts on habitat include, but are not limited to, habitat loss and fragmentation, narrowing of a wildlife corridor, and introduction of barriers to wildlife movement. Considering that mountain lion is now a candidate species, the SEIR should discuss how the Project may have direct and indirect impacts on mountain lion resulting from increased human presence, traffic, noise, and artificial lighting; edge effects including, but not limited to, introduction and invasion of non-native plant species into natural areas; attraction for wildlife with food or backyard conditions; predation and disease by domestic animals; and habitat fragmentation caused by volunteer trails. The SEIR should disclose how existing mitigation measures avoid potential direct take of mountain lion.
- 3) Fire. The Project proposes to decrease the development footprint in sites within a 'Very High' Fire Severity Zone (County of Los Angeles 2021) resulting more areas of urban/wildlife interface that may increase wildlife occurrences. Development in the wildland urban interface could increase fire frequency and intensity, thus impacting biological resources in adjacent undeveloped hillsides, open space, and wilderness. Moreover, fuel modification would need to occur in perpetuity as part of the Project. According to page 105 of the Initial Study, Mitigation Measure RMDP/SCP-PH-14 requires the development of a Wildfire Fuel Modification Plan. Fuel modification would result in additional, permanent habitat loss. CDFW recommends the SEIR discuss how the Project may impact open space/natural areas with respect to intensifying land use in areas that are highly susceptible to fire.

CDFW recommends the County consider additional measures in the SEIR to mitigate fire risk, frequency, and severity. CDFW also recommends the County include a discussion of how impacts to open space/natural habitats stemming from fuel modification are adequately mitigated.

- 4) Analysis of Effects on Wildlife. The Project's proposal to develop in the wildland urban interface could impact wildlife. Impacts could result from increased human presence, traffic, noise, and artificial lighting. Increased human-wildlife interactions could lead to wildlife injury or mortality. CDFW recommends the SEIR discuss whether the Project may have direct and indirect impacts on wildlife resulting from increased human presence, traffic, noise, and artificial lighting. An assessment of impacts on wildlife should also provide a discussion of edge effects, including, but not limited to, introduction and invasion of non-native plant species into natural areas; attraction for wildlife with food or backyard conditions; predation and disease by domestic animals; and habitat fragmentation caused by volunteer trails.


Jodie Sackett
County of Los Angeles
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- 5) Wildlife Movement. The Project proposes the construction of stream crossings which could impede wildlife movement between natural habitat areas/open space. Maintaining wildlife movement and habitat connectivity is essential for wildlife survival and is increasingly important considering habitat loss and climate change. CDFW recommends the SEIR evaluate the proposed stream crossings' suitability to allow wildlife movement where appropriate through the Project site. The SEIR should disclose what wildlife species (e.g., coyote, bobcat, mountain lion, and deer) would be able to utilize the open space affected by the constructed stream crossings.

Conclusion

We appreciate the opportunity to comment on the NOP for the Entrada South and Valencia Commerce Center Project to assist the County of Los Angeles in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Nicole Leatherman, Environmental Scientist, at Nicole.Leamerhan@wildlife.ca.gov or (858)-761-8020.

Sincerely,

DocuSigned by:


B6E58CFE24724F5
Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

cc: CDFW

Erinn Wilson-Olgin – Erinn.Wilson-Olgin@wildlife.ca.gov
Victoria Tang – Los Alamitos – Victoria.Tang@wildlife.ca.gov
Ruby Kwan-Davis – Los Alamitos – Ruby.Kwan-Davis@wildlife.ca.gov
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Julisa Portugal – Los Alamitos – Julisa.Portugal@wildlife.ca.gov
Cindy Hailey – San Diego – Cindy.Hailey@wildlife.ca.gov
CEQA Program Coordinator – Sacramento – CEQACommentLetters@wildlife.ca.gov
State Clearinghouse - state.clearinghouse@opr.ca.gov

References:

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 November 8, 2021
 Page 6 of 6

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From: IGR – Intergovernmental Review <IGR@scag.ca.gov>
Sent: Monday, November 1, 2021 5:52 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Cc: Anita Au <au@scag.ca.gov>; Frank Wen <WEN@scag.ca.gov>
Subject: SCAG Comments on the NOP of a DEIR for the Entrada South and Valencia Commerce Center Project [SCAG NO. IGR10497]

CAUTION: External Email. Proceed Responsibly.

Good morning Jodie,

Please find attached SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Entrada South and Valencia Commerce Center Project [SCAG NO. IGR10497].

Please contact me at (213) 630-1427 or IGR@scag.ca.gov if you have any questions or difficulties with the attached file.

In light of the coronavirus and other public health concerns, please be advised that a majority of SCAG staff are teleworking with limited access to the SCAG offices. Therefore, if you wish to submit documents for IGR review, please submit it online via the [IGR webpage](#) or via email to IGR@scag.ca.gov.

Thank you!



Intergovernmental Review (IGR) Program

Annaleigh Ekman (she/her), Assistant Regional Planner
Tel: (213) 630-1427

IGR@scag.ca.gov

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700, Los Angeles, CA 90017





November 1, 2021

Mr. Jodie Sackett
County of Los Angeles, Department of Regional Planning
320 West Temple Street, Room 1362
Los Angeles, California 90012
Phone: (213) 974-6433
Email: subdivisions@planning.lacounty.gov

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Entrada South and Valencia Commerce Center Project [SCAG NO. IGR10497]

Dear Mr. Sackett,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Entrada South and Valencia Commerce Center Project ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG's adopted regional plans, to be determined by the lead agencies.¹

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies. Finally, SCAG is also the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Entrada South and Valencia Commerce Center Project in Los Angeles County. The proposed project consists of modified development within the Entrada Planning Area, including 151 fewer residential units for a total of 1,574 units, an additional 280,000 square feet (SF) of non-residential uses for a total of 730,000 SF, drainage channel enhancements, and additional open space to improve wetland protection on 382 acres; and the Valencia Commerce Center Planning Area, including increased open space, restored drainage areas, and habitat for species in Halsey Creek and Castaic Creek on 321 acres.

When available, please email environmental documentation to IGR@scag.ca.gov providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Intergovernmental Review (IGR) Program, attn.: Anita Au, Senior Regional Planner, at (213) 236-1874 or IGR@scag.ca.gov. Thank you.

Sincerely,

Frank Wen, Ph.D.
Manager, Planning Strategy Department

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2020 RTP/SCS (Connect SoCal) for the purpose of determining consistency for CEQA.

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Transportation
Sean Ashton, Downey

**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
ENTRADA SOUTH AND VALENCIA COMMERCE CENTER PROJECT [SCAG NO. IGR10497]**

CONSISTENCY WITH CONNECT SOCIAL

SCAG provides informational resources to facilitate the consistency of the proposed project with the adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with Connect SoCal.

CONNECT SOCIAL GOALS

The SCAG Regional Council fully adopted [Connect SoCal](#) in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCIAL GOALS	
Goal #1:	<i>Encourage regional economic prosperity and global competitiveness</i>
Goal #2:	<i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>
Goal #3:	<i>Enhance the preservation, security, and resilience of the regional transportation system</i>
Goal #4:	<i>Increase person and goods movement and travel choices within the transportation system</i>
Goal #5:	<i>Reduce greenhouse gas emissions and improve air quality</i>
Goal #6:	<i>Support healthy and equitable communities</i>
Goal #7:	<i>Adapt to a changing climate and support an integrated regional development pattern and transportation network</i>
Goal #8:	<i>Leverage new transportation technologies and data-driven solutions that result in more efficient travel</i>
Goal #9:	<i>Encourage development of diverse housing types in areas that are supported by multiple transportation options</i>
Goal #10:	<i>Promote conservation of natural and agricultural lands and restoration of habitats</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG CONNECT SOCIAL GOALS		
Goal		Analysis
Goal #1:	<i>Encourage regional economic prosperity and global competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
Goal #2:	<i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.		etc.

Connect SoCal Strategies

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. Of particular note are multiple strategies included in Chapter 3 of Connect SoCal intended to support implementation of the regional Sustainable Communities Strategy (SCS) framed within the context of focusing growth near destinations and mobility options; promoting diverse housing choices; leveraging technology innovations; supporting implementation of sustainability policies; and promoting a Green Region. To view Connect SoCal and the accompanying technical reports, please visit the [Connect SoCal webpage](#). Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG's 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal's Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect

SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the [Connect SoCal Demographics and Growth Forecast Technical Report](#). The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts				Adopted Los Angeles County Forecasts			
	Year 2020	Year 2030	Year 2035	Year 2045	Year 2020	Year 2030	Year 2035	Year 2045
Population	19,517,731	20,821,171	21,443,006	22,503,899	10,407,326	10,899,849	11,173,987	11,673,937
Households	6,333,458	6,902,821	7,170,110	7,633,451	3,471,759	3,749,346	3,884,871	4,119,336
Employment	8,695,427	9,303,627	9,566,384	10,048,822	4,838,458	5,059,615	5,171,618	5,382,235

MITIGATION MEASURES

SCAG staff recommends that you review the [Final Program Environmental Impact Report](#) (Final PEIR) for Connect SoCal for guidance, as appropriate. SCAG's Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see the [PEIR webpage](#) and scroll to the bottom of the page for the PEIR Addendum). The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

From: Lijin Sun <LSun@aqmd.gov>

Sent: Tuesday, November 2, 2021 7:27 PM

To: DRP Subdivisions <subdivisions@planning.lacounty.gov>

Subject: South Coast AQMD Staff NOP Comments for the Entrada South and Valencia Commerce Center Project

CAUTION: External Email. Proceed Responsibly.

Dear Mr. Sackett,

Attached are South Coast AQMD staff's comments on the Notice of Preparation of a Draft Supplemental Environmental Impact Report for the Entrada South and Valencia Commerce Center Project (South Coast AQMD Control Number: LAC211102-01). Please contact me if you have any questions regarding these comments.

Thank you,

Lijin Sun
Program Supervisor, CEQA IGR
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
Direct: (909) 396-3308
Fax: (909) 396-3324

**Please note that the building is closed to the public.*



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

November 2, 2021

subdivisions@planning.lacounty.gov

Jodie Sackett, Senior Planner
County of Los Angeles, Regional Planning Department
320 West Temple Street, Room 1362
Los Angeles, California 90012

**Notice of Preparation of a Draft Supplemental Environmental Impact Report for
the Proposed Entrada South and Valencia Commerce Center Project
(SCH No.: 2000011025)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Supplemental Environmental Impact Report (EIR). Please send a copy of the Draft Supplemental EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft Supplemental EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files).** Any delays in providing all supporting documentation for our review **will require** additional review time beyond the end of the comment period.

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated.

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants and include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. A portion of the Proposed Project in the Entrada South Planning Area will include, among others, 1,574 residential units and is located in close proximity to Interstate 5, and to facilitate the purpose of a Supplemental EIR as an informational document, it is recommended that the Lead Agency perform a mobile source health risk assessment to disclose the potential health risks⁵.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Supplemental EIR. The assumptions in the air quality analysis in the Supplemental EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*⁶ is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory⁷.

The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*⁸ includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook¹, South Coast AQMD's Mitigation Monitoring and

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

⁷ CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

⁸ South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

Reporting Plan for the 2016 Air Quality Management Plan⁹, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy¹⁰.

Health Risk Reduction Strategies

Many strategies are available to reduce exposures, including, but are not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters¹¹, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy consumption that the Lead Agency should evaluate in the Draft Supplemental EIR. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste that the Lead Agency should evaluate in the Draft Supplemental EIR. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to diesel particulate matter emissions.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC211102-01

Control Number

⁹ South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

¹⁰ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at:

https://www.connectsoocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

¹¹ This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <https://onlinelibrary.wiley.com/doi/10.1111/ina.12013>.

From: Mike Marshall <MMARSHALL@santa-clarita.com>
Sent: Monday, November 8, 2021 3:58 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Entrada South/VCC NOP Response Letter

CAUTION: External Email. Proceed Responsibly.

Mr. Sackett,

Attached please find a letter dated November 8, 2021 in response to the recently released Notice of Preparation for the Entrada South/VCC project. A hard copy is forthcoming via US Mail. Please let me know if you have any questions.

Thank you,

Mike Marshall
Associate Planner
City of Santa Clarita

Phone: (661) 286-4045
Email: MMARSHALL@santa-clarita.com
Web: www.santa-clarita.com





City of
SANTA CLARITA

23920 Valencia Boulevard • Santa Clarita, California 91355-2196
Phone: (661) 259-2489 • FAX: (661) 259-8125
www.santa-clarita.com

November 8, 2021

VIA EMAIL TO subdivisions@planning.lacounty.gov AND US MAIL

Mr. Jodie Sackett
Subdivisions
Department of Regional Planning
County of Los Angeles
320 West Temple Street, Room 1362
Los Angeles, CA 90012

Subject: Notice of Preparation of a Draft Supplemental Environmental Impact Report for the
Entrada South and Valencia Commerce Center Project

Dear Mr. Sackett,

The City of Santa Clarita (City) appreciates the opportunity to provide the following comments in response to the Notice of Preparation of a Draft Supplemental Environmental Impact Report (DSEIR) for the Entrada South and Valencia Commerce Center (VCC) project.

The proposed project consists of limited modifications to the development of the Entrada South and VCC Planning Areas, as compared to the development evaluated in the State-certified Environmental Impact Report (EIR). The modified project includes enhanced environmental protections for each planning area to include a reduction of 151 dwelling units from the approved 1,725-unit project to 1,574 units within the Entrada South Planning Area. The modified project would also include an increase of 280,000 square feet of non-residential floor area, from 450,000 square feet to 730,000 square feet. Further, the modified project would include enhanced environmental protection measures to both the Entrada South and VCC Planning Areas, including, but not limited to, restoration of an existing drainage channel and a reduction of permanent impacts to Hasley Creek and Castaic Creek that would be revegetated after construction.

As a part of the One Valley One Vision (OVOV) planning process, the City and Los Angeles County (County) mutually benefited from a partnership that resulted in the development of planning documents that created a shared vision for the future of the Santa Clarita Valley. The Santa Clarita General Plan and Santa Clarita Valley Area Plan continue to be the foundation for land use decisions for the planning area and a unified vision for development in the Santa Clarita Valley. Therefore, the City of Santa Clarita is providing the following comments regarding the proposed modified project:

Jobs/Housing Balance

The County and the City have both taken steps to address the issue of jobs/housing balance in the

Santa Clarita Valley through the adoption of policies contained within the Santa Clarita General Plan and Santa Clarita Valley Area Plan. Policies contained within these updates strive to work towards the goal of increasing employment in the Santa Clarita Valley in order to reduce the need of residents to commute into the Los Angeles Basin. The City supports the addition of non-residential floor area as a part of the modified project as a means to achieving the goals and policies established within the Santa Clarita General Plan and Santa Clarita Valley Area Plan.

Air Quality

As described in the project description, the modified project would include changes to the land use plan for the Entrada South Planning Area. To thoroughly evaluate potential impacts to air quality, the DSEIR should analyze the modifications associated to the project utilizing South Coast Air Quality Management District's recommended air quality models.

Biological Resources

As described in the project description, the modified project would result in a reduction of 151 dwelling units and an addition of 280,000 square feet of non-residential floor area. Additional biological analysis should be performed to address any potential impacts resulting in a modified development envelope.

Land Use Planning

As described in the project description, the modified project would result in a reduction of 151 dwelling units and an addition of 280,000 square feet of non-residential floor area. Additional analysis should be conducted regarding potential impacts as a result of any hillside development activity that differs from that analyzed in the State-certified EIR.

Transportation

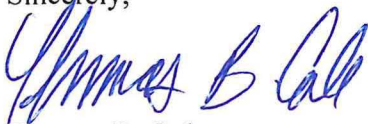
Due to the proposed reduction in residential dwelling units and the increase of non-residential floor area associated with the Entrada South Planning Area portion of the modified project, the project's traffic consultant should coordinate with the City's Traffic Engineer to determine the most appropriate intersections to study as a part of the required traffic impact analysis. Further, vehicle miles traveled should be used as the appropriate metric to evaluate the significance of any potential transportation impacts.

Utilities/Service

The DSEIR should incorporate a thorough analysis of any potential impacts to water and wastewater services resulting from the proposed modified project that differs from that analyzed in the State-certified EIR.

Thank you again for the opportunity to comment on the Notice of Preparation. If you have any questions, please contact Mike Marshall, Associate Planner, at (661) 286-4045.

Sincerely,



Thomas B. Cole
Director of Community Development

From: Ciuffetelli, Anthony <Anthony.Ciuffetelli@ventura.org>
Sent: Monday, November 8, 2021 8:53 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Agency Comments Regarding Initial Study

CAUTION: External Email. Proceed Responsibly.

Good Afternoon,

Attached to this e-mail are the following comments regarding the Entrada South and Valencia Commerce Center project.

-VC Air Pollution Control District

Please feel free to contact me with any questions regarding this submission. Responses to these comments should be sent directly to the commenter with a copy to me.

Regards,

Anthony Ciuffetelli
Ventura County Planning Division
Planning Programs
(805)654-2443





Ventura County
Air Pollution
Control District

4567 Telephone Rd
Ventura, California 93003


tel 805/303-4005
fax 805/456-7797
www.vcapcd.org

Dr. Laki Tisopoulos, P.E.
Air Pollution Control Officer

**VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT**
Memorandum

TO: Mr. Jodi Sackett, Dept. of Regional Planning County of LA, Subdivisions

DATE: November 04, 2021

FROM: Nicole Collazo, Air Quality Specialist, Planning Division 

SUBJECT: Comments on Draft Initial Study Entrada South and Valencia Commerce Center Project (RMA 15-009-1)

Ventura County Air Pollution Control District (VCAPCD) staff has reviewed the draft Initial Study (IS) and Notice of Preparation (NOP) of a Supplemental Environmental Impact Report (SEIR) for the proposed project referenced above (project). The project implements the development within the Entrada and VCC Planning Areas facilitated by the approved RMDP/SCP and analyzed in the state0certified EIR, and reflects limited changes to these planning areas, as depicted in the NOP's refinements summary table, which indicates the Entrada South Planning Area will have a net difference of 151 residential units and an increase in 280,000 sq. ft. of non-residential land use. In contrast, the VCC Planning Area will have a net difference of 0 in both proposed residential and non-residential development.

Even though the project will be located within Los Angeles County and in the jurisdiction of South Coast Air Quality Management District, the project is near the eastern Ventura County line and it is possible for short term air quality impacts to occur to sensitive receptors in the Piru community and beyond from the anticipated construction activities during predominantly eastern wind events, such as Santa Ana wind events and inversion layers that occur during the smog season which may prevent air pollutants from dispersing properly. VCAPCD would like to make the following general comments regarding the Initial Study.

GENERAL COMMENTS

Air Quality Section

Item 1- The IS states that mitigation measures RMDP-SCP-AQ-1 through AQ-12 would reduce construction emissions to some extent, but would remain significant and unavoidable (Page 41). We recommend updating the mitigation measures since first proposed to conform with more recent air pollution regulation, such as requiring Tier-4 Final EPA rating for diesel off-road construction equipment, using a "2010 Model Year Emissions Equivalent Engine" for on-road diesel vehicles (California State Regulation for In-Use On-Road Diesel Vehicles Title 13, CCR §2025), or other mitigation measures than further reduce construction emissions, and in consideration of new impacts identified in the SEIR.

Item 2- As stated in the IS, VCAPCD also recommends use of CalEEMod air emissions estimation model in place of URBEMIS model program used at the time the SEIR was prepared. We recommend using the most current version available, version 2020.4.0, while also taking into account the most recent energy, water and wastewater standards codified into state regulations, such as Title 24.

Thank you for the opportunity to review the project. If you have any questions, you may email me at nicole@vcapcd.org.

From: Cuadra, Alexandra <Alexandra.Cuadra@fire.lacounty.gov>
Sent: Thursday, October 14, 2021 11:27 AM
To: Jodie Sackett <jsackett@planning.lacounty.gov>
Cc: Padilla, Juan <Juan.Padilla@fire.lacounty.gov>
Subject: RE: Entrada South and Valencia Commerce Center Project

Good Morning,

Please see attached letter for the following project.

Thank you,

Alexandra Cuadra

Secretary III, Forestry Division

Los Angeles County Fire Department

5823 Rickenbacker Road, Room 123

Commerce, Ca 90040

Phone- (323)890-4330

Alexandra.Cuadra@Fire.Lacounty.gov





COUNTY OF LOS ANGELES FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
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KATHRYN BARGER
FIFTH DISTRICT

October 14, 2021

Jodie Sackett, Planner
Department of Regional Planning
Planning Department
320 W. Temple Street
Los Angeles, CA 90012

Dear Ms. Sackett:

The County of Los Angeles Fire Department's Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division have reviewed the following case **RPPL2021007114**.

Entrada South and Valencia Commerce Center. Notice of Preparation.

The following are their comments:

PLANNING DIVISION:

We will reserve our comments for the Supplemental EIR as part of wildfire impact analysis.

For any questions regarding this response, please contact Kien Chin, Planning Analyst, at (323) 881-2404 or Kien.Chin@fire.lacounty.gov.

LAND DEVELOPMENT UNIT:

1. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.
2. Specific fire and life safety requirements for the construction phase will be addressed at the Fire Department building plan check review. There may be additional fire and life safety requirements during this time.

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

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ARTESIA
AZUSA
BALDWIN PARK
BELL
BELL GARDENS
BELLFLOWER
BRADBURY
CALABASAS

CARSON
CERRITOS
CLAREMONT
COMMERCE
COVINA
CUDAHY
DIAMOND BAR
DUARTE

EL MONTE
GARDENA
GLENDALE
HAWAIIAN GARDENS
HAWTHORNE
HERMOSA BEACH
HIDDEN HILLS
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LA CANADA-FLINTRIDGE
LA HABRA
LA MIRADA
LA PUENTE
LAKEWOOD
LANCASTER

LAWDALE
LOMITA
LYNWOOD
MALIBU
MAYWOOD
NORWALK
PALMDALE
PALOS VERDES ESTATES
PARAMOUNT

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POMONA
RANCHO PALOS VERDES
ROLLING HILLS
ROLLING HILLS ESTATES
ROSEMEAD
SAN DIMAS
SANTA CLARITA

SIGNAL HILL
SOUTH EL MONTE
SOUTH GATE
TEMPLE CITY
VERNON
WALNUT
WEST HOLLYWOOD
WESTLAKE VILLAGE
WHITTIER

3. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways with an all-weather surface. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of all buildings. The roadway where parking is not permitted, shall provide approved signs and/or stripping stating, "NO PARKING - FIRE LANE" and shall be maintained in accordance with the County of Los Angeles Fire Code.
4. The proposed development may necessitate multiple ingress/egress access for the circulation of traffic and emergency response issues.
5. Every building constructed shall provide an adequate water supply for fire protection purposes. The fire flow and fire hydrant spacing shall be determined with the review of plans.
6. This property is located within the area described by the Fire Department as a Fire Hazard Severity Zone. A "Fuel Modification Plan" shall be submitted to the Fuel Modification for review by the Fuel Modification Unit prior to the issuance of building plans. Please contact the Department's Fuel Modification Unit for details. The Fuel Modification Plan Review Unit is located at 605 North Angeleno Avenue in the City of Azusa CA 91702-2904. They may be reached at (626) 969-5205 or visit <https://www.fire.lacounty.gov/forestry-division/forestry-fuel-modification>

The Land Development Unit appreciates the opportunity to comment on this project. Should any questions arise, please contact Wally Collins at (323) 890-4243 or Wally.Collins@fire.lacounty.gov.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Nicholas Alegria at (818) 890-5719.

Jodie Sackett, Planner

October 14, 2021

Page 3

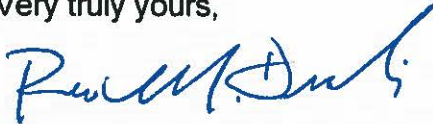
HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department advises that the HHMD Site Mitigation Unit will likely be retained by the project sponsor to provide regulatory environmental oversight for the assessment and cleanup of potentially contaminated soil if identified and/or encountered during the implementation of project site developments.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

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

Very truly yours,

A handwritten signature in blue ink, appearing to read "Ron M. Durbin".

RONALD M. DURBIN, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

RMD:ac

From: Campomanes, Rochelle E. <RECampom@lasd.org>
Sent: Monday, November 1, 2021 9:09 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Cc: Wang, Meghan Y. <m2ywang@lasd.org>
Subject: ENV - Entrada South and VCC (NOP- Supplemental EIR) - LASD Comments

Dear Mr. Sackett:

Please find the attached file for the project mentioned above. Please let me know if you have any comments or questions. Thank you very much.

Rochelle Campomanes, LEED AP
Departmental Facilities Planner I
Facilities Planning Bureau
Tel: 323-526-5614



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OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF



October 28, 2021

Mr. Jodie Sackett, Senior Planner
County of Los Angeles
Department of Regional Planning
Subdivisions
320 West Temple Street, Room 1362
Los Angeles, California 90012

Dear Mr. Sackett:

**REVIEW COMMENTS
NOTICE OF PREPARATION OF A
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT
ENTRADA SOUTH (PENDING PROJECT NUMBER) AND
VALENCIA COMMERCE CENTER [PROJECT NO. 81-150-(5)] PROJECT**

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the October 2021 Notice of Preparation (NOP) of a Draft Supplemental Environmental Impact Report (Draft SEIR) for the Entrada South (ES) and Valencia Commerce Center (VCC) Project (Project). The proposed Project for ES is located in the west side of I-5 and The Old Road, on the north and south side of Magic Mountain Parkway, and south of Six Flags Magic Mountain theme park whereas VCC is located in an undeveloped portion of the partially completed VCC industrial/business park center and is located west of I-5 and The Old Road, north of SR-126, and east of Commerce Center Drive and the Chiquita Canyon landfill. The proposed Project is a Modified Project which increases environmental protections to wetlands and related biological resources within the Entrada Planning Area and VCC Planning Area.

The Modified Project for ES enhances and restores portions of a drainage channel referred to as Unnamed Canyon 2. It would be enhanced and restored as a natural, open, vegetated drainage channel with grade control structure that would generally retain the look and feel of a natural drainage, thus

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

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reducing permanent impacts to biological resources and jurisdictional waters and providing additional open space within the developed portions of the Project site. The Modified Project for ES also includes 1,574 dwelling units (including affordable housing units consistent with the County's Inclusionary Housing Ordinance or a potential Development Agreement), 73,000 square feet of non-residential development, a neighborhood park and potential school site, a spineflower preserve, and trails and infrastructure within the Entrada Planning Area. On the other hand, there would be no proposed new or additional buildout for VCC Planning Area beyond the County-approved existing VCC entitlements for VCC Modified Project. The only proposed changes involve a reduction in permanent impacts to Halsey Creek and Castaic Creek which traverse the VCC Planning Area, including reduction of permanent impacts to certain vegetation communities and jurisdictional stream habitat.

The proposed Project is located within the service area of the Department's Santa Clarita Valley Sheriff's Station (Station) located at 26201 Golden Valley Road in Santa Clarita. The proposed ES Modified Project is approximately 9.7 miles from the current Station while the proposed VCC Modified Project is approximately 11.9 miles from the current Station. Per Section 15. Public Services Section 4.18 on page 91 of the Initial Study (IS), the proposed Project would have less than significant impacts on the current level of service provided by the Station. The Modified Project represents a slight reduction in floor area to ES, while the VCC development remains unchanged. Although there would be potentially a slight decrease in resident population due to the reduction in number of residential units for ES Modified Project, but there would be an increase in general commercial developed land proposed by the ES Modified Project which may potentially increase the number of visitors and daytime population. In addition to the Project Design Features and Mitigation Measures indicated on pages 14-15 of IS Appendix IS-1, the Department also recommends that the principles of Crime Prevention through Environmental Design (CPTED) are incorporated in the design plans.

The Department remains concerned that continued growth and intensification of land uses within the service area will ultimately contribute to significant cumulative impacts on the Department's resources and operations. The Department will provide further comments for the Draft SEIR during the public review period.

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

Mr. Sackett

- 3 -

October 28, 2021

Tracey Jue, Director
Facilities Planning Bureau
Los Angeles County Sheriff's Department
211 West Temple Street
Los Angeles, California 90012

Attention: Planning Section

Should you have any questions regarding this matter, please contact me at (323) 526-5657, or your staff may contact Ms. Rochelle Campomanes of my staff, at (323) 526-5614.

Sincerely,

ALEX VILLANUEVA, SHERIFF

A handwritten signature in black ink, appearing to read 'T. Jue', is positioned above the typed name and title.

Tracey Jue, Director
Facilities Planning Bureau

From: Tracey Carpentier <tfcarpentier@gmail.com>
Sent: Monday, October 18, 2021 9:03 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Entrada South and Valencia Commerce Center (VCC) Project

CAUTION: External Email. Proceed Responsibly.

Dear Mr. Sackett,

Please see the attached letter re: the Entrada South and Valencia Commerce Center (VCC) Project. Please feel free to contact me if you have questions or need additional information.

Thank you,

Tracey Carpentier
President, Bridge to Home Board of Directors
cell: 661-607-3257
email: tfcarpentier@gmail.com

BRIDGE TO HOME

homeless services | Help. Hope. Change.



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Michael Foley
Executive Director

October 18, 2021

Mr. Jodie Sackett
Subdivisions, Department of Regional Planning
County of Los Angeles
320 W. Temple Street, Room 1362
Los Angeles, CA 90012

Dear Mr. Sackett,

On behalf of Bridge to Home – a nonprofit organization dedicated to serving those who are experiencing homelessness in the Santa Clarita Valley – I am writing to express my support for FivePoint Valencia and the next phase of this growing community, Entrada South and Valencia Commerce Center.

Bridge to Home is deeply invested in addressing the conditions and causes of homelessness, to help families and individuals access safe, stable housing they can depend on. We proudly serve over 1,000 people annually, but unfortunately the need for our services continues to rise.

The causes of homelessness are varied and complex. But we know one effective solution is to make more housing available, especially housing that is within reach financially. FivePoint Valencia is delivering that solution for the Santa Clarita Valley. The first phase of the community is entitled to provide more than 4,000 homes, and the next phase of the project – Entrada South – will deliver another 1,500 homes. These homes are desperately needed in L.A. County, which is facing a severe housing shortfall, along with all of California.

Critically, the price points for these homes begin far below the median price for the County—in the \$400,000-range. That is remarkably low for new construction in our housing-starved region.

Long-term, FivePoint Valencia promises to make an even greater impact on the housing landscape, creating up to 21,500 homes at full build-out. That will make a significant, lasting impact on housing availability in the Santa Clarita Valley. Hopefully, that will mean fewer families and individuals will be in need of our services as a result.

Finally, we know the FivePoint team and we know they work with quality and integrity. They have earned our trust. We encourage L.A. County to approve the next phase of this community, we hope to see the entire Valencia vision take shape as soon as possible.

Sincerely,

Tracey Carpentier
President, Bridge to Home Board of Directors
tfcarpentier@gmail.com
(661) 607-3257



RECEIVED
OCT 26 2021

BY:

13691 W. Vaughn Street
San Fernando, CA 91340
Tel. (818) 225-6800
Fax (818) 896-2842

October 19, 2021

County of Los Angeles
Department of Regional Planning, Subdivisions
320 W. Temple Street, Room 1362
Los Angeles, CA 90012
Attn: Mr. Jodie Sackett

Dear Mr. Jodie Sackett,

My name is Tony Messina of BrightView Landscape Development, Inc. and I'm a member of the Los Angeles Building and Construction Trades. I currently represent approximately 150 field employees in the local laborers and pipe fitters union within Los Angeles County.

FivePoint has been a strong and productive partner for the Building Trades in LA County. Our work together at FivePoint Valencia has created significant numbers of high-quality jobs that pay prevailing wage and create meaningful opportunity for our members.

FivePoint Valencia is already a powerful economic engine for the Santa Clarita Valley, and all of L.A. County. And there's tremendous growth still to come. An economic analysis shows that construction of the full FivePoint Valencia community will create more than 131,000 total jobs and generate \$7.7 billion in labor income for the County.

At the same time, the community will help to relieve our region's severe housing shortage through the creation of up to 21,500 new homes, designed for individuals and families with a wide range of incomes. It will also create many thousands of high-quality, permanent new jobs located nearby, supporting a strong jobs-housing balance.

Entrada South and the completion of the Valencia Commerce Center are an important next step toward the completion of the full Valencia Vision. It will help sustain our economy while setting a new standard of sustainability. I look forward to this next phase of the Valencia community being approved.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tony Messina".

Tony Messina
BrightView Landscape Development, Inc.
Vice President, General Manager



C. A. RASMUSSEN, INC.

General Engineering Contractors

License No. 254681 A

Valencia Commerce Center
28548 Livingston Avenue
Valencia, CA 91355-4171
Telephone 661.367.9040
Fax 661.367.9097
www.carasmussen.com

October 20, 2021

County of Los Angeles
Department of Regional Planning, Subdivisions
320 W. Temple Street, Room 1362
Los Angeles, CA 90012

Attention: Mr. Jodie Sackett

My name is Adam Rasmussen of C.A. Rasmussen, Inc. We are a family-owned construction business located in the Santa Clarita Valley. We have been working and partnering with FivePoint for many years.

FivePoint has been a strong and productive partner for the Building Trades in LA County. We employ many Santa Clarita residents and are signatory members of the Operating Engineers, Labors, Cement Masons and Carpenters unions. Our work at FivePoint Valencia has generated thousands of manhours of prevailing wage work for our members.

FivePoint Valencia is already a powerful economic engine for the Santa Clarita Valley, and all of L.A. County. And there's tremendous growth still to come. An economic analysis shows that construction of the full FivePoint Valencia community will create more than 131,000 total jobs and generate \$7.7 billion in labor income for the County.

At the same time, the community will help to relieve our region's severe housing shortage through the creation of up to 21,500 new homes, designed for individuals and families with a wide range of incomes. It will also create many thousands of high-quality, permanent new jobs located nearby, supporting a strong jobs-housing balance.

Entrada South and the completion of the Valencia Commerce Center are an important next step toward the completion of the full Valencia Vision. It will help sustain our economy while setting a new standard of sustainability. As a local business owner, I look forward to this next phase of the Valencia community being approved.

Sincerely,

Adam Rasmussen

Vice President
CA Rasmussen, Inc.

From: Jairo Avila <jairo.avila@tataviam-nsn.us>
Sent: Friday, November 5, 2021 12:22 PM
To: Jodie Sackett <jsackett@planning.lacounty.gov>
Cc: Kimia Fatehi <kfatehi@tataviam-nsn.us>; Rudy Ortega <rortega@tataviam-nsn.us>
Subject: FTBMI NOP Draft SEIR Entrada South and Valencia Commerce Center Project

CAUTION: External Email. Proceed Responsibly.

Dear Mr. Sackett,

Attached is a formal response to the NOP Draft SEIR for the Entrada South and Valencia Commerce Center Project. Should you have any questions, please let me know. I look forward to future discussions with you as the Project develop.

Respectfully,

Jairo F. Avila, M.A., RPA.
Tribal Historic and Cultural Preservation Officer
Cultural Resources Management Division
Tribal Historic and Cultural Preservation Department

Fernandeño Tataviam Band of Mission Indians
1019 Second Street, Suite 1
San Fernando, California 91340
Office: (818) 837-0794
Website: <http://www.tataviam-nsn.us>



Fernandeno Tataviam Band of Mission Indians

Tribal Historic & Cultural Preservation Department
Cultural Resources Management Division

Rudy J. Ortega, Jr.
Tribal President

*Tribal Historic & Cultural
Preservation Committee*

Lucia Alfaro
Chairperson
Richard Ortega
Jesus Alvarez

November 5, 2021

Jodie Sackett
Subdivisions
Department of Regional Planning
County of Los Angeles
320 W. Temple Street, Room 1362
Los Angeles, CA 90012

Sent via email to jsackett@planning.lacounty.gov

Subject: Fernandeno Tataviam Band of Mission Indians Notice of Preparation of the Draft Supplemental Environmental Impact Report Comments for the Entrada South and Valencia Commerce Center Project

Dear Jodie Sackett,

On behalf of the Fernandeno Tataviam Band of Mission Indians (FTBMI), thank you and the Los Angeles County Department of Regional Planning (Lead Agency) for the Notice of Preparation of the Draft Supplemental Environmental Impact Report (SEIR) for the Entrada South and Valencia Commerce Center Project ("Project"). The Project falls within the traditional and historical jurisdiction of the FTBMI and encompasses the lineage-villages from which the 900 citizens of the FTBMI descends.

The Cultural Resource Management (CRM) Division of the FTBMI understands that, in accordance with State CEQA guidelines Section 15082(b), the Lead Agency is accepting comments to identify specific topics of environmental concern to address in preparation of the SEIR. The FTBMI is monitoring the progress of the Project and continuing to work closely with the applicant to address potential impacts to Native American resources by the proposed Project.

We ask that the County's Draft SEIR for the Project update the tribal and cultural resources within the Project area. At this time, the CRM Division has no further information to provide the Lead Agency but looks forward to discussing the Project in detail during the AB52 Consultation Phase. We are confident that the Project can be implemented while preserving in place any cultural sites or appropriately recovering the cultural data currently within these sites if the resources cannot be preserved in place. Having direct lineage connections to the Project area and over 15 years of involvement and consultation with the applicant and other agencies, the FTBMI request to be a consulting party to provide comments and recommendations on all matters pertaining to cultural resources. Should you have any questions or wish to discuss this letter any further, please feel free to contact me at Jairo.avila@tataviam-nsn.us or 818-837-0794 x202.

Respectfully submitted,

A handwritten signature in black ink, reading "Jairo F. Avila". The signature is written in a cursive, flowing style.

Jairo F. Avila, M.A., RPA
Tribal Historic and Cultural Preservation Officer

CC:

Rudy Ortega Jr. – Fernandeno Tataviam Band of Mission Indians
Kimia Fatehi – Fernandeno Tataviam Band of Mission Indians

From: Friends of the Santa Clara River <friendsofthesantaclarariver@earthlink.net>
Sent: Tuesday, November 9, 2021 1:44 AM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Entrada South #083592 Notice of Preparation
CAUTION: External Email. Proceed Responsibly.

Comments attached



Friends of the Santa Clara River

PO Box 7719

Ventura, California 93006

(805) 320-2265

www.fscr.org

11-8-21

Attn: Jodie Sackett
Los Angeles Dept of Regional Planning
320 W. Temple St.
Los Angeles, CA 90012

Sent via email to: subdivisions@planning.lacounty.gov

Re: Entrada South #083592 Notice of Preparation (NOP)

Dear Ms. Sackett:

Please find below our comments and concerns related to the Notice of Preparation for the 1574 unit Entrada Project and commercial additions to the Commerce Center Project, part of Fivepoint's "westside" proposals but not evaluated under the Newhall Ranch Specific Plan. The Initial Study proposes a "Supplemental" EIR tiering on the Resource Management Plan and excluding evaluation of several areas, including GHG/Climate Change. We disagree with this proposal.

Noticing

First, we object to the inadequate notice for the public hearing and the NOP comment period. Apparently this scoping session was so rushed that the first information that went out did not even have a project number assigned to it. Thus many people were prevented from attending the scoping hearing because they didn't know about it in time. Failing to give adequate public notice to ensure participation, begs the question of whether or not you really want the public comment required by CEQA.

Tiering on the Resource Management Plan

Second, as you are aware, an EIR for the former tract map on this site was prepared in 2015 and processed through the draft stage. Then the process stopped for some reason. (the 2015 Supreme Court decision?). Interestingly, at that time you did not try to tier from the Resource Management Plan as you are doing in the tract before you.

A Supplemental EIR that excludes climate change evaluation is not sufficient

We do not believe that a supplemental EIR which you are proposing is adequate to address the numerous sections where you rely on the Resource Plan, a state and federal document prepared for a 404 and river alteration permit with no County conditions of approval. It is well established that the purpose of an EIR is to provide public agency decision-makers and members of the public with an informational document that explains

potentially significant environmental impacts and feasible mitigation measures. (Pub. Res. Code §§ 21002.1, 21061; CEQA Guidelines §§ 15121, 15151; *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 426-27; *Carmel Valley View, Ltd. v. Board of Supervisors* (1976) 58 Cal.App.3d 817, 821-822.) An EIR must include the full range of potentially significant impacts, as well as reasonably prudent avoidance, minimization, and mitigation measures in the EIR to comply with CEQA's information disclosure requirements. (Pub. Res. Code § 21000 et seq.) CEQA requires the planning agency to "mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so." (Pub. Res. Code §§ 21002.1(b); 15126.4.) Mitigation of a project's significant impacts is one of the "most important" functions of CEQA. (*Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41.) **Importantly, mitigation measures must be "fully enforceable through permit conditions, agreements, or other measures" so "that feasible mitigation measures will actually be implemented as a condition of development."** (*Federation of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261 ((quoting Pub. Res. Code § 21081.6(b))).).

The DEIR must include sections on GHG and aesthetics. We believe that the Resource Plan, even if reliance upon it were considered legal, is based on outdated or inapplicable studies and data. Significant new information will substantially change the DEIR's analyses of the Project's impacts, alternatives and required mitigation, so these areas must be covered in the new document. (*Laurel Heights Improvement Assn. v. Regents of Univ. of Cal.* (1993) 6 Cal.4th 1112, 1132 (*Laurel Heights*).)

Under CEQA, a later EIR shall be required when the initial study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR .and a new EIR must be prepared for review and comment whenever significant new information becomes known to the lead agency. Under such circumstances the lead agency is specifically required to re-notice the environmental review document to the public and all responsible agencies, and is required to obtain comments from the same, before certifying the document's impacts, its alternatives analyses, and any mitigation measures. (*See id.*; *see also*, Cal Pub. Res. Code § 21153.) A lead agency's decision not to include a required section of an EIR must be supported by substantial evidence. (CEQA Guidelines § 15088.5(e).)

"Significant new information" includes any information regarding changes in the environmental setting of the project under review. (CEQA Guidelines § 15088.5(a).) It also includes information or data that has been added to the EIR and is considered "significant" because it deviates from that which was presented in the document on which it is being tiered, depriving the public from a meaningful opportunity to comment upon a significant environmental effect of the project, or a feasible way to mitigate or avoid such an effect at the time of circulation of the draft. (*Id.*)

Some examples when a lead agency may ***not*** rely on tiering an EIR:

- (1) When the new information shows a new, substantial environmental impact resulting either from the project or from a mitigation measure;
- (2) When the new information shows a substantial increase in the severity of an environmental impact

(3) When the new information shows a feasible alternative or mitigation measure that clearly would lessen the environmental impacts of a project and the project proponent declines to adopt the mitigation measure;

Inclusion of GHG/Climate Change Analysis

The Initial Study excludes a GHG analysis, instead relying on the Resource Management Plan. We believe that the impacts to climate change from auto-oriented projects such as Entrada South and the proposed commercial additions have substantially changed since the previous EIR, including increased occurrences of wildfire and reduced precipitation. A new traffic study needs to be included that accurately assesses commuter traffic and includes traffic from the huge landfill expansion approved in July of 2017, well after the previous EIR. Base line assumptions may need to be reevaluated regarding emissions.

As we write, COP 26¹ is underway in Glasgow, Scotland. The youth of many nations are demonstrating outside and speaking in desperation about a climate emergency that the older generation of participating leaders seem to fail to recognize. One mantra is that “net” zero, such as promised by Newhall Ranch developers in its previous approval, is not enough. CO2 must be reduced from current levels not stay the same. The continued rise in emissions constitutes a reason that a chapter on GHG emissions and how they can be reduced must be included and circulated with this supplement EIR.

Water Supply

In the recently released Groundwater Sustainability Plan² to which we provided extensive comments, the SCV Water Agency stated that:

*“But the [Groundwater Management Plan, Santa Clara River Valley Groundwater Basin, East Subbasin, Los Angeles County, California](#) (Basin Operating Plan) described in Section 6 **contemplates groundwater levels lower than historical levels during dry years, to accommodate future buildout, conjunctive use operating strategies, and climate change (LSCE, 2003).**”(emphasis added) (p. 8-4)*

.....groundwater pumping may temporarily cause groundwater level declines of up to 150 feet in the future. (page 9-15)

We note that one reason the first iteration of the Newhall Ranch Specific Plan EIR was set aside in 2000 was that it predicted a 10-foot drop in ground water levels, meaning downstream users and environmental needs would be receiving substantially less water. This caused a loud and swift reaction in the form of protests and lawsuits. It appears such a drop in ground water levels is contemplated again by the County and the water Agency.

No such water level drop was disclosed or contemplated in the Resource Management Plan. This is unacceptable and must be addressed in any new document.

¹ 2021 United Nations Climate Change Conference.

² Santa Clarita Valley Ground Water Sustainability Plan, included by reference, may be accessed here: <https://share.gsiws.com/index.php/s/CrynwfbbiHFCqgT>

The River and groundwater basins are connected systems. We note that lower water levels would impact surface water and groundwater interactions and could impact downstream aquatic species, particularly critical Southern California steelhead habitat and recovery actions established by NMFS in the 2012 Southern California Steelhead Recovery Plan. This must be addressed in the EIR.

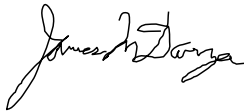
Of course we expect that an updated Water Supply Assessment as required by the water code (SB221) for a project this size will be included and circulated to the public.

Conclusion

We believe updated studies on traffic, CO2 emissions, biology, water supply, fire and other safety hazards (such as a study regarding the safety of building on or near existing oil wells) must be included in any new document. Also, an analysis or inclusion of the mitigation report on the existing climate change mitigations required for the approved Mission tract, so that the public may evaluate whether the proposed mitigation is in actuality producing reduced climate emissions.

We do not concur that the Climate chapter may be excluded.

Sincerely,



James M. Danza
Chair, Friends of the Santa Clara River



— FRIENDS OF —
THE SANTA CLARA RIVER



A coalition of community and business leaders focused on the health and vitality of California's transportation backbone:
— Interstate 5 —

October 20, 2021

Mr. Jodie Sackett
Subdivisions
Department of Regional Planning
County of Los Angeles
320 W. Temple Street, Room 1362
Los Angeles, CA 90012

Dear Commissioners:

I am writing to urge the approval of FivePoint Valencia's next phase – Entrada South and the completion of Valencia Commerce Center. Completion of these projects will provide housing, create jobs and contribute substantially to the economic vitality of Los Angeles County without increasing greenhouse gas emissions.

My organization, the Golden State Gateway Coalition was created nearly 20 years ago by community and business leaders, to advocate for transportation improvements in North Los Angeles County.

The Gateway Coalition has worked to secure major funding for significant improvements to reduce congestion in and around the I-5 freeway corridor. In fact, LA Metro will begin construction this month on a \$700 million project to improve safety, reduce traffic congestion and enhance freight movement through the Santa Clarita Valley. Improvements to the Old Road, (which runs parallel to the I-5) and a new bridge linking housing to a major commerce center are planned to follow.

FivePoint is also making significant investments to develop a cutting-edge Transportation Management Organization on the property, and to improve transportation infrastructure throughout the area, while reducing greenhouse gas emissions. Installing EV chargers in every home and throughout the county, building dedicated neighborhood electric vehicle pathways, and more, is a testament to FivePoint's dedication to sustainable development.

FivePoint is a credible organization that puts the interests of this region first. We're proud to support the next stage of FivePoint Valencia.

Sincerely,

Victor Lindenheim
Executive Director



October 19, 2021

County of Los Angeles
Department of Regional Planning, Subdivisions
320 W. Temple Street, Room 1362
Los Angeles, CA 90012
Attn: Mr. Jodie Sackett

Dear Mr. Sackett,

My name is Brian McCosker, President and CEO of Independent Construction Company and member of the Los Angeles Building and Construction Trades. FivePoint has been a strong and productive partner for the Building Trades in LA County. We have been working with FivePoint Valencia for many years and have created significant numbers of high-quality jobs that pay prevailing wage and create meaningful opportunity for our members.

FivePoint Valencia is already a powerful economic engine for not only the Santa Clarita Valley, but all of L.A. County and there's tremendous growth still to come. An economic analysis shows that construction of the full FivePoint Valencia community will create more than 131,000 total jobs and generate \$7.7 billion in labor income for the County. At the same time, the community will help to relieve our region's severe housing shortage through the creation of up to 21,500 new homes, designed for individuals and families with a wide range of incomes. Additionally, it will also create many thousands of high-quality, permanent new jobs located nearby, supporting a strong jobs-housing balance.

Entrada South and the completion of the Valencia Commerce Center are an important next step toward the completion of the full Valencia Vision. This vision will help sustain our economy while setting a new standard of sustainability. I look forward to this next phase of the Valencia community being approved and the continued partnership with all.

Sincerely,



Brian C. McCosker
President/CEO

LEATHERWOOD CONSTRUCTION INC.

17050 Bushard Street, Ste-213

Fountain Valley, CA 92708

714-593-6575 (P)

714-593-6576 (F)

LICENSE #760851

October 19, 2021

County of Los Angeles
Department of Regional Planning Subdivisions
320 W. Temple Street, Room 1362
Los Angeles, CA 90012

Attn: Mr. Jodie Sackett

Jodie:

My name is Bobby Kawai of Leatherwood Construction, Inc. and I'm a member of the Los Angeles/Orange County Building and Construction Trades with both the Laborers and Operating Engineers Union.

FivePoint has been a very strong and productive partner for the Building Trades in Los Angeles/Orange County. Our work together at FivePoint Valencia has created significant numbers of high-quality jobs that pay prevailing wage and create meaningful opportunity for all of our members.

FivePoint Valencia is already a powerful economic engine for the Santa Clarita Valley, and all of L.A. County. And there's tremendous growth still to come in the foreseeable future. An economic analysis shows that construction of the full FivePoint Valencia community will create more than 131,000 total jobs and generate \$7.7 billion in labor income for the County.

At the same time, the community will help to relieve our region's severe housing shortage through the creation of up to 21,500 new homes, designed for individuals and families with a wide range of incomes. It will also create many thousands of high-quality, permanent new jobs located nearby, supporting a strong jobs-housing balance.

Entrada South and the completion of the Valencia Commerce Center are an important next step toward the completion of the full Valencia Vision. It will help sustain our economy while setting a new standard of sustainability. I look forward to this next phase of the Valencia community being approved.

Sincerely,
LEATHERWOOD CONSTRUCTION, INC.



Bobby Kawai,
Vice-President



GENERAL ENGINEERING CONTRACTOR
P.O. BOX 5670, VENTURA, CALIFORNIA 93005
PHONE (805) 644-6278 · FAX (805) 644-2813
License No. 648594-A

County of Los Angeles
Department of Regional Planning, Subdivisions
320 W. Temple Street, Room 1362
Los Angeles, CA 90012

Attn: Mr. Jodie Sackett

- My name is Scott Anderson of Sam Hill & Sons, Inc. and I'm a member of the Los Angeles Building and Construction Trades. We are a Union Contractor, signatory with the Operating Engineers and Laborers Unions.
- FivePoint has been a strong and productive partner for the Building Trades in LA County. Our work together at FivePoint Valencia has created significant numbers of high-quality jobs that pay prevailing wage and create meaningful opportunity for our members.
- FivePoint Valencia is already a powerful economic engine for the Santa Clarita Valley, and all of L.A. County. And there's tremendous growth still to come. An economic analysis shows that construction of the full FivePoint Valencia community will create more than 131,000 total jobs and generate \$7.7 billion in labor income for the County.
- At the same time, the community will help to relieve our region's severe housing shortage through the creation of up to 21,500 new homes, designed for individuals and families with a wide range of incomes. It will also create many thousands of high-quality, permanent new jobs located nearby, supporting a strong jobs-housing balance.
- Entrada South and the completion of the Valencia Commerce Center are an important next step toward the completion of the full Valencia Vision. It will help sustain our economy while setting a new standard of sustainability. I look forward to this next phase of the Valencia community being approved.

Sincerely,

Scott Anderson
Vice President

From: Ryan Nordness <Ryan.Nordness@sanmanuel-nsn.gov>

Sent: Tuesday, October 12, 2021 8:57 PM

To: DRP Subdivisions <subdivisions@planning.lacounty.gov>

Subject: RE: Entrada South and Valencia Center Project, Los Angeles County, CA

CAUTION: External Email. Proceed Responsibly.

Jodie,

Thank you for contacting the San Manuel Band of Mission Indians (SMBMI) regarding the above-referenced project. SMBMI appreciates the opportunity to review the project documentation, which was received by the Cultural Resources Management Department on October 7th. The proposed project is located outside of Serrano ancestral territory and, as such, SMBMI will not be requesting to receive consulting party status with the lead agency or to participate in the scoping, development, or review of documents created pursuant to legal and regulatory mandates.

Kind regards,

Ryan Nordness

Cultural Resource Analyst

San Manuel Band of Mission Indians

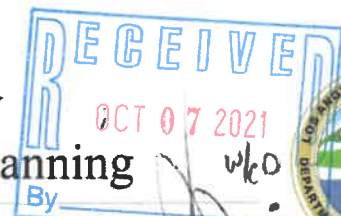
THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. If the reader of this message is not the intended recipient or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination or copying of this communication is strictly prohibited. If you have received this electronic transmission in error, please delete it from your system without copying it and notify the sender by reply e-mail so that the email address record can be corrected.

Thank You



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

Entrada South and Valencia Commerce Center Project

Entrada South:
Vesting Tentative Tract Map No. 083582

Valencia Commerce Center:
Vesting Tentative Parcel Map No. 18108

NOTICE OF PREPARATION of a DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT and PUBLIC SCOPING MEETING

Project No. TBD (New Project No. Forthcoming)¹
State Clearinghouse No. 2000011025

Prepared by:

County of Los Angeles
Department of Regional Planning, Subdivisions
320 W. Temple Street, Room 1362
Los Angeles, CA 90012
Attn: Mr. Jodie Sackett

October 7, 2021

¹ The current VCC Project No. is 87-150-(5); a new Project No. for Entrada South is pending.



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

NOTICE OF PREPARATION OF A DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING

DATE: October 7, 2021

TO: State Clearinghouse, Responsible Agencies, Trustee Agencies, Organizations and Interested Parties

SUBJECT: Notice of Preparation (NOP) of a Draft Supplemental Environmental Impact Report (SEIR) in accordance with the California Environmental Quality Act (CEQA) and State CEQA Guidelines (see Public Resources Code Sections 21080.4 and 21083.9 and California Code of Regulations (CCR) Title 14, Sections 15082 and 15375).

The County of Los Angeles (County) is the Lead Agency pursuant to CEQA and intends to prepare a SEIR for the proposed Project identified below. The County has prepared this NOP and the accompanying Environmental Checklist Form (Initial Study) to provide Responsible and Trustee Agencies and other interested parties with information describing the Project, to identify the Project's potential environmental effects, and to solicit input regarding the scope and content of the environmental analysis.

AGENCIES: The County requests your agency's views on the scope and content of the environmental information relevant to your agency's statutory responsibilities in connection with the proposed Project, in accordance with State CEQA Guidelines Section 15082(b). Your agency may need to use the SEIR prepared by the County when considering any permits that your agency must issue or other approvals for the Project.

ORGANIZATIONS AND INTERESTED PARTIES: The County requests your comments and concerns regarding the environmental issues associated with construction and operation of the proposed Project.

PROJECT TITLE: Entrada South and Valencia Commerce Center (VCC) Project

PROJECT NO.: TBD (New Project No. Forthcoming)²

PROJECT LOCATION AND ENVIRONMENTAL SETTING: The Project Site is located within the northwest portion of Los Angeles County (County), west of I-5 and the City of

² The current VCC Project No. is 87-150-(5); a new Project No. for Entrada South is pending.



Santa Clarita, as show on **Figure 1, Regional Location Map**, on page 3. As shown in **Figure 2.1, Project Vicinity Map**, on page 4, the Project Site is located in an unincorporated area of the County, within the Santa Clarita Valley Planning Area (Valley Planning Area). The Project Site's location relative to the local roadway network is depicted in **Figure 2.2, Local Location and Roadway Network Map**, on page 5.

The Project Site is within the planning boundary of the State-approved Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan (RMDP/SCP), which was the subject of a State-certified Environmental Impact Report (EIR) (SCH No. 2000011025; hereafter referred to as the State-certified EIR). In the State-certified EIR for the RMDP/SCP, the Project Site is identified as the "Entrada Planning Area" and the "VCC Planning Area." The Entrada Planning Area is also sometimes referred to as Entrada South or the Entrada South Planning Area. The Project Site is adjacent to but not located within the Newhall Ranch Specific Plan area.

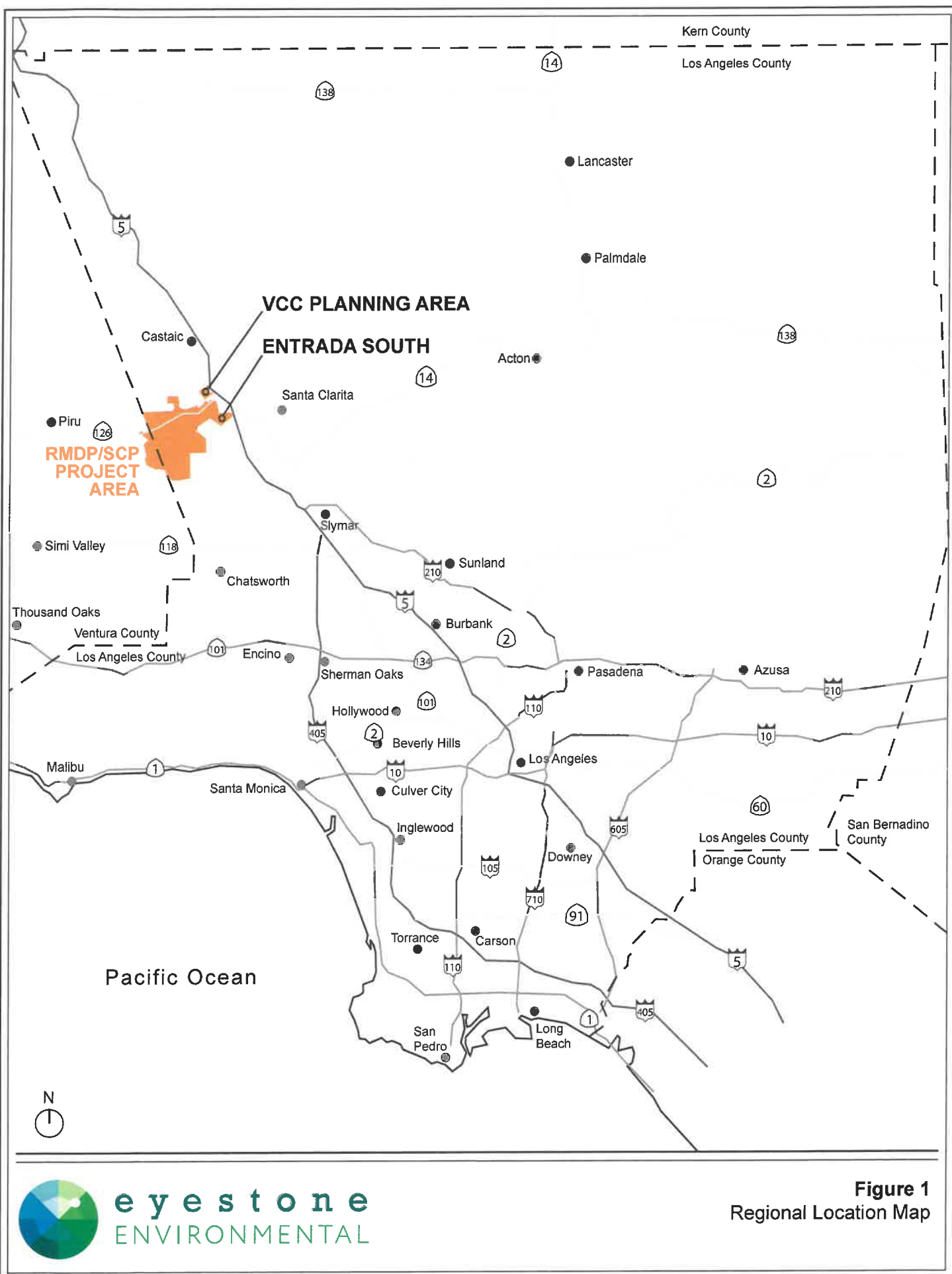
The Entrada Planning Area consists of approximately 382 acres and is located west of I-5 and The Old Road, on the north and south side of Magic Mountain Parkway, and south of Six Flags Magic Mountain theme park. Surrounding development and land uses include the proposed Entrada North community to the north, the City of Santa Clarita east of The Old Road and I-5, the existing community of Westridge to the south, and the Newhall Ranch Specific Plan area to the west. Within the Newhall Ranch Specific Plan area, the approved Mission Village community, which has been under development since the end of 2017, is located immediately west of the Entrada Planning Area. Additionally, the proposed Legacy Village community is located to the southwest.

The VCC Planning Area consists of approximately 321 acres in an undeveloped portion of the partially completed VCC industrial/business park center and is located west of I-5 and The Old Road, north of SR-126, and east of Commerce Center Drive and the Chiquita Canyon landfill. The VCC Planning Area is surrounded by existing single-family residential and industrial uses to the north, existing industrial uses to the east, the proposed Entrada North community to the south, and Chiquita Canyon Landfill to the west.

PROJECT DESCRIPTION: The Entrada South and VCC Project implements the development within the Entrada and VCC Planning Areas facilitated by the approved RMDP/SCP and analyzed in the State-certified EIR. The California Department of Fish and Wildlife (CDFW) certified the State-certified EIR in June 2017, at which time it also approved the RMDP/SCP and related State permits. Los Angeles County was a responsible agency for the RMDP/SCP and participated in the State-certified EIR process through the receipt and review of the Draft and Final EIRs as well as the Draft and Final Additional Environmental Analysis and the submittal of comments, which were addressed by CDFW. The Entrada South and VCC Project is consistent with the One Valley One Vision (OVOV) Area Plan's projected buildout and land use designations, as evaluated in the OVOV EIR and approved by the County.

The proposed Entrada South and VCC Project reflects limited changes and refinements to the development of the Entrada and VCC Planning Areas, as compared to the development evaluated in the State-certified EIR. As such, the Entrada South and VCC Project is referred to herein as the "Modified Project." A Supplemental EIR, tiered from the State-certified EIR, will be prepared by

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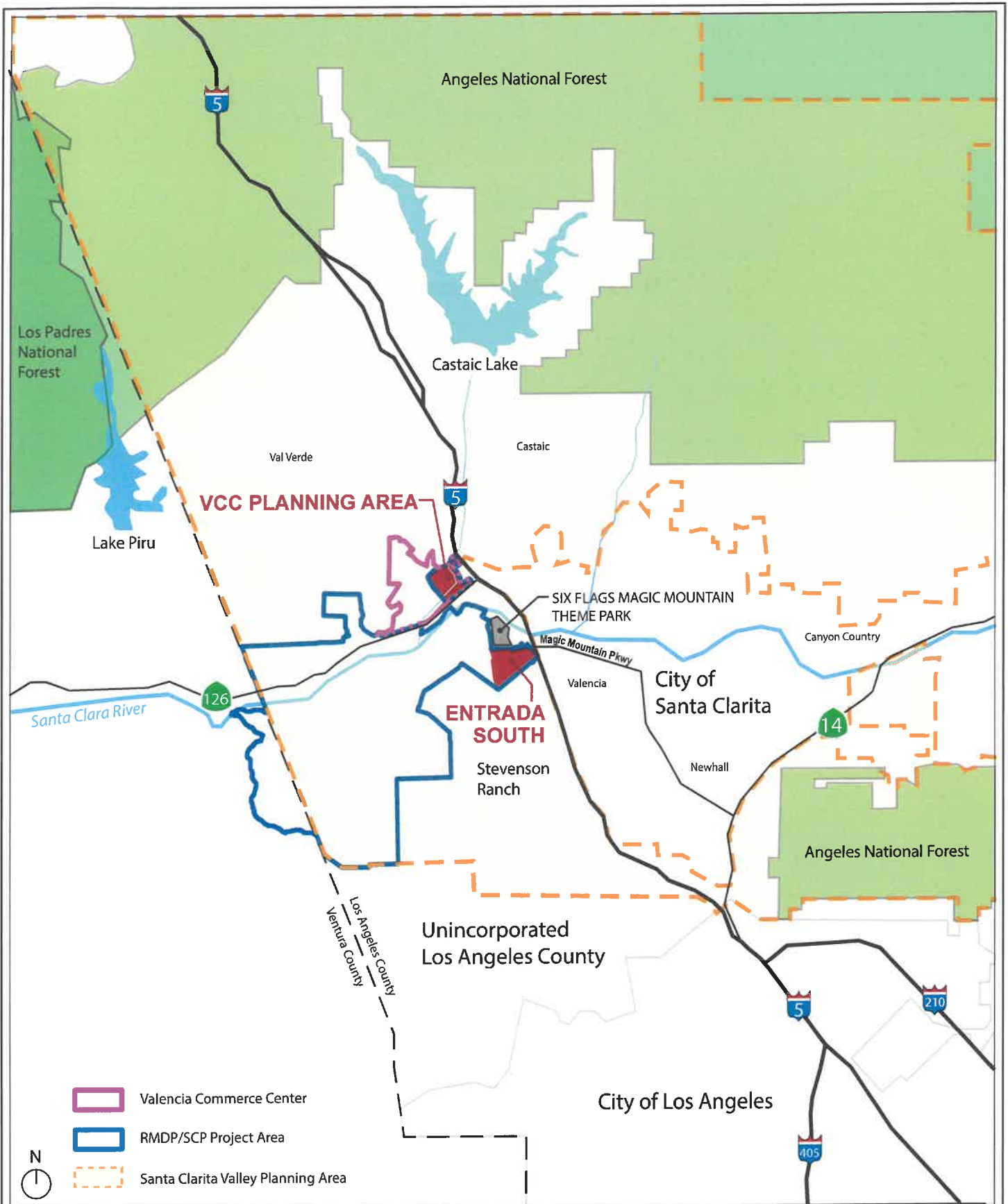


Figure 2.1
Project Vicinity Map

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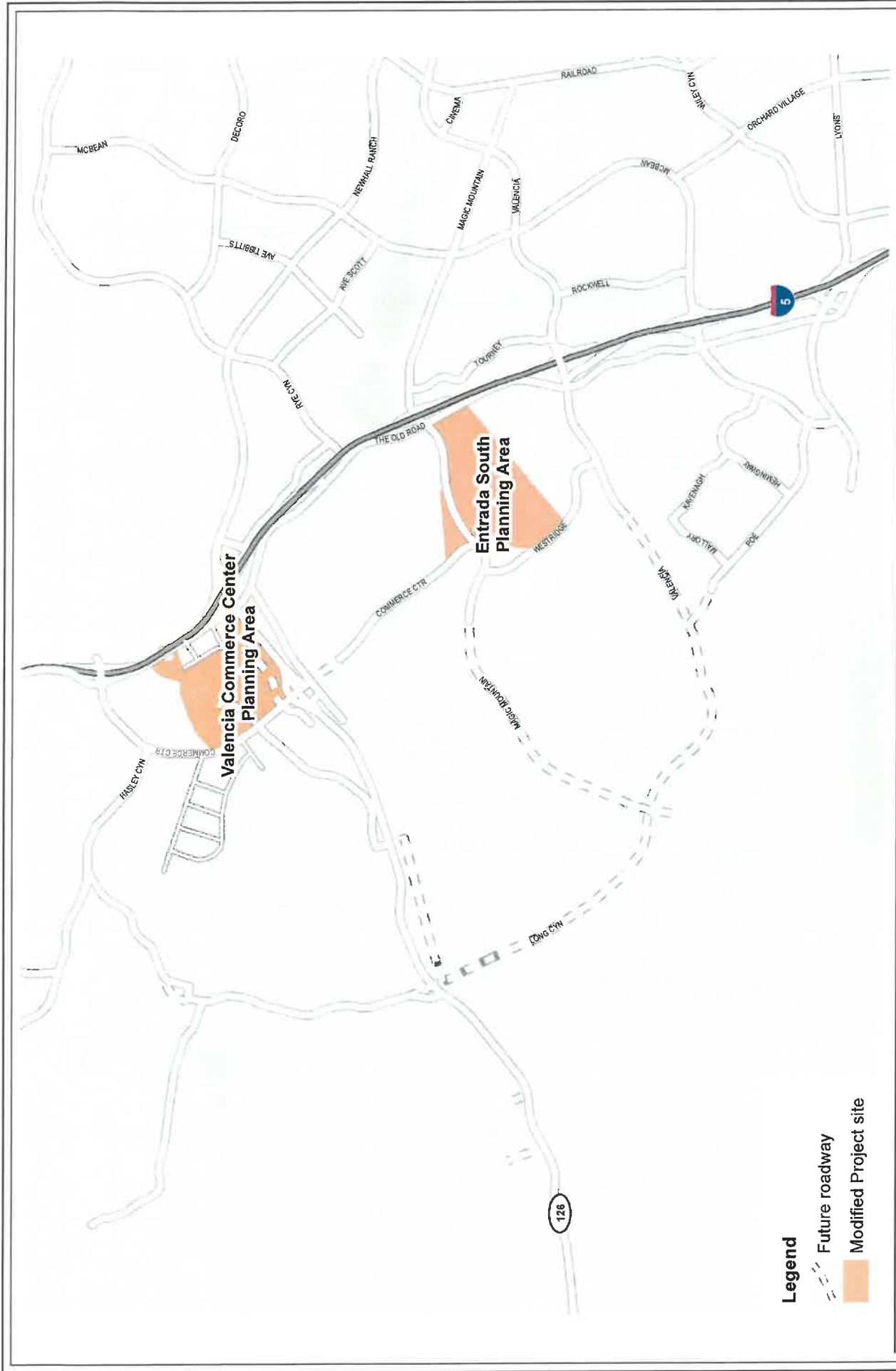


Figure 2.2
Local Location and Roadway Network Map

Source: Stantec, 2021.

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the County as the CEQA lead agency for the Modified Project. The Supplemental EIR will allow the County, as the CEQA lead agency, and other agencies as CEQA responsible agencies, to consider additional discretionary entitlements needed to complete development of the Entrada and VCC Planning Areas under the Modified Project.

The Modified Project includes enhanced environmental protections for each planning area, as described below and in more detail in the Initial Study. A summary of the Modified Project refinements to the balance of residential and non-residential development is shown in the following table.

Planning Area/ Land Use	State-Certified EIR Approved Project	Modified Project	Difference
<i>Entrada South Planning Area</i>			
Residential Units	1,725	1,574 (to comply with OVOV Area Plan)	- 151
Non-Residential	450,000 SF	730,000 SF	+ 280,000 SF
<i>VCC Planning Area</i>			
Residential Units	0	0	0
Non-Residential	3,400,000 SF	3,400,000 SF	0

Entrada Planning Area

The Conceptual Land Use Plan for the Entrada Planning Area is shown in **Figure 3, Conceptual Land Use Plan—Entrada South**, on page 7. The proposed minor changes and refinements under the Modified Project, as compared to the 2017 Approved Project analyzed in the State-certified EIR, include:

Enhanced Environmental Protections

The Modified Project increases environmental protections to wetlands and related biological resources within the Entrada Planning Area. The Modified Project enhances and restores portions of a drainage channel referred to as Unnamed Canyon 2. With the proposed design refinements, portions of Unnamed Canyon 2—from the storm drain outlet at the southern Entrada boundary to Magic Mountain Parkway—would be enhanced and restored as a natural, open, vegetated drainage channel with grade control structures that would generally retain the look and feel of a natural drainage, thus reducing permanent impacts to biological resources and jurisdictional waters and providing additional open space within the developed portions of the Project Site. This environmentally beneficial modification would result in increased open space, restored drainage areas, and habitat for species as compared to that evaluated in the State-certified EIR.³

³ As part of the Modified Project's environmental enhancements within Entrada South, temporary disturbance of a 0.6-acre previously disturbed golf course area within The Oaks Club at Valencia golf course, which is located off-site and immediately south of Entrada South within the Westridge community, is required to accommodate a necessary storm drain connection. This previously-disturbed golf course area would experience temporary impacts during a brief construction period and would be revegetated and restored as a portion of the golf course following completion of the storm drain connection associated with Unnamed Canyon 2.

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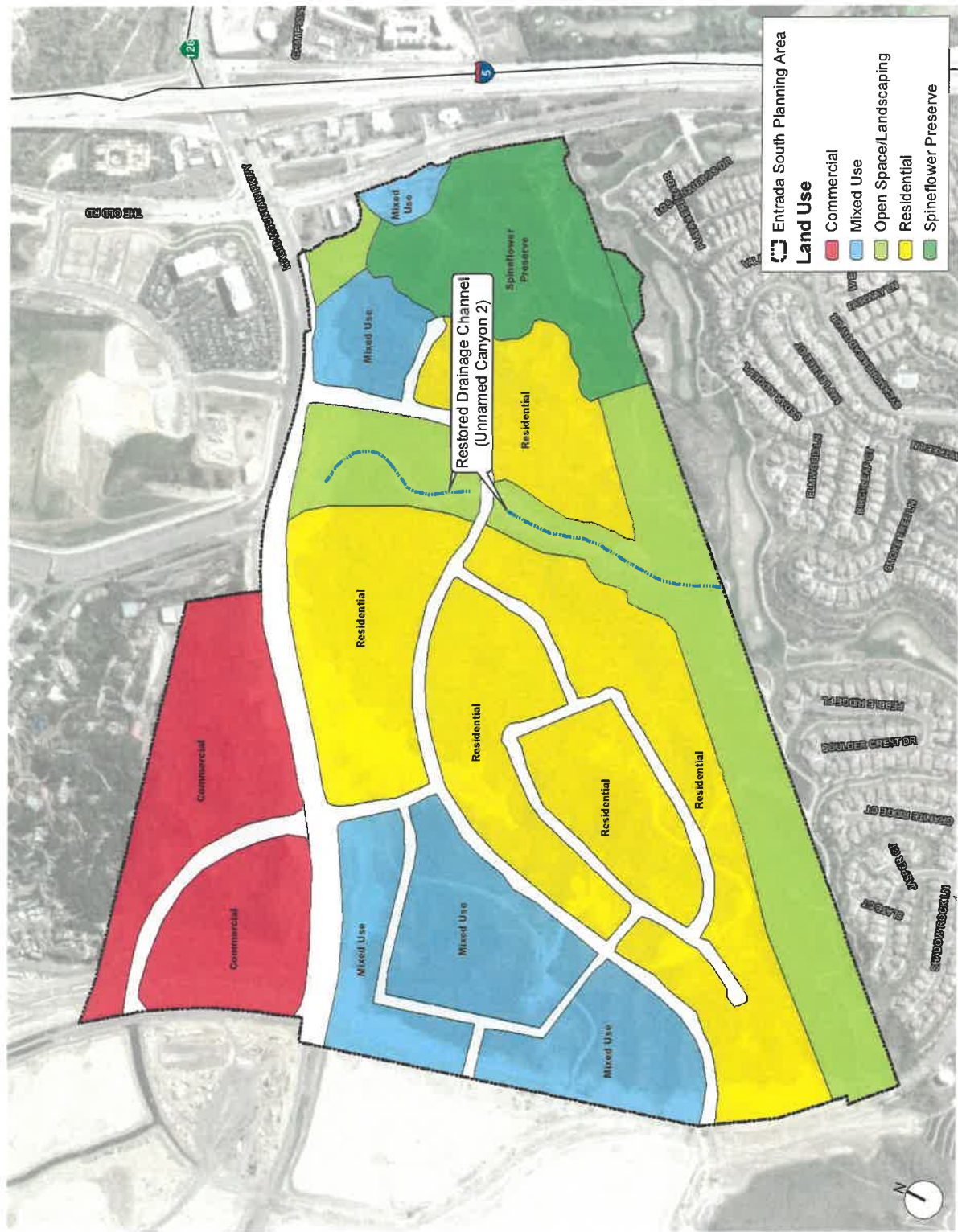


Figure 3
Conceptual Land Use Plan – Entrada South

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Refinements to the Balance of Residential and Non-Residential Development

The State-certified EIR for the 2017 Approved Project evaluated the environmental impacts of 1,725 dwelling units, 450,000 square feet of non-residential development, a public facilities area for a neighborhood park and a potential school site, private recreational amenities, a spineflower preserve, and trails and infrastructure within the Entrada Planning Area. The Modified Project includes 1,574 dwelling units (including affordable housing units consistent with the County's Inclusionary Housing Ordinance or a potential Development Agreement), 730,000 square feet of non-residential development, a neighborhood park and potential school site, a spineflower preserve, and trails and infrastructure within the Entrada Planning Area. The refinements to the land use plan for Entrada South ensure consistency with the density of residential units allowed under the OVOV Area Plan land use designation for Entrada South. As such, this analysis considers the environmental implications of reducing the number of residences by 151 units and increasing the amount of non-residential development by 280,000 square feet. These refinements do not substantially change the scope of the Entrada South land use plan when comparing the Modified Project to the 2017 Approved Project. Non-residential development could include any allowable uses consistent with the zoning designation, including but not limited to commercial, office, retail, and hotel uses. If a school site is not ultimately needed in Entrada South, that area would become available for residential development provided the overall number of allowable units (1,574 dwelling units) is not exceeded.

VCC Planning Area

As relevant background, VCC was approved for development by Los Angeles County through the issuance of various entitlements and certification of an EIR (SCH No. 1987-123005) in 1991, which is incorporated by reference. The existing VCC entitlement approved by the County allows approximately 12.6 million square feet of industrial/business park space at build-out, of which approximately 9 million square feet has been constructed. The VCC Planning Area evaluated herein as part of the Modified Project is comprised of approximately 3.4 million square feet of industrial/business park space within the County-approved and partially completed VCC industrial/business park center. Following the County-certified VCC EIR, development of the undeveloped portion of the VCC Planning Area was also analyzed in the State-certified EIR, with up to 3.4 million square feet of non-residential development that would be facilitated by the RMDP/SCP. Under the Modified Project and consistent with the State-certified EIR, the VCC Planning Area would be developed consistent with the uses allowed by the County-approved VCC entitlements and existing zoning. Thus, the Modified Project does not propose any new or additional buildout of the VCC Planning Area beyond what was analyzed in the State-certified EIR, and the Modified Project would not result in any buildout of VCC beyond the County-approved existing VCC entitlements.

The Conceptual Land Use Plan for the VCC Planning Area is shown in **Figure 4, Conceptual Land Use Plan—VCC Planning Area**, on page 9. The proposed minor changes and refinements under the Modified Project, as compared to the 2017 Approved Project analyzed in the State-certified EIR, include:

Enhanced Environmental Protections

The only proposed changes and refinements within the VCC Planning Area are comprised of additional environmental protections. Specifically, to provide increased environmental protections

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Figure 4
Conceptual Land Use Plan – VCC Planning Area

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to wetlands and related biological resources within the VCC Planning Area, the Modified Project involves a reduction in permanent impacts to Hasley Creek and Castaic Creek (such areas may be temporarily impacted during construction, as analyzed in the State-certified EIR, but would be restored and revegetated after construction based on the Modified Project design) which traverse the VCC Planning Area, including a reduction of permanent impacts to certain vegetation communities and jurisdictional stream habitat. This environmentally beneficial modification would result in increased open space, restored drainage areas, and habitat for species.

The Modified Project is an example of sustainable development that achieves net zero greenhouse gas emissions. The Modified Project includes applicable mitigation measures from the State-certified EIR, including 13 mitigation measures related to greenhouse gas impacts that would reduce the Project's greenhouse gas emissions to net zero and are identical to those imposed on the 2017 Approved Project in accordance with the State-certified EIR. These mitigation measures went through extensive review and refinement as a part of the State-certified EIR, including review by the California Air Resources Board, the State authority on climate policy.

For additional information about the Project, please refer to the Initial Study.

Under CEQA, when evaluating project changes relative to a previously certified EIR, the additional CEQA analysis shall focus solely on the incremental changes in the project, changes in circumstances, or new information since the certification of the prior EIR.

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED (E.G., PERMITS, FINANCING APPROVAL, OR PARTICIPATION AGREEMENT): Below is a list of permits and approvals which are known to be needed, or may be needed, to implement various Project components in the future:

Implementation of the Modified Project requires County entitlements to be submitted, reviewed, and approved in accordance with the Los Angeles County Subdivision Ordinance and the California Subdivision Map Act, consistent with the County General Plan, the Santa Clarita Valley Area Plan: One Valley One Vision 2012 (OVOV Area Plan), and Los Angeles County Code Titles 21 and 22, Zoning and Subdivision Ordinances. Potential entitlements include a zone change and vesting tentative tract map (Entrada South), tentative parcel map (VCC), conditional use permit (Entrada South), oak tree permits, parking permits, development agreement(s) and such other approvals, as needed, ministerial or otherwise, which the County has determined are necessary to develop the Entrada Planning Area. The Modified Project may also require a Streambed Alteration Agreement from CDFW, a Section 401 Certification from the Los Angeles Regional Water Quality Control Board (RWQCB) or alternatively, waste discharge requirements, Army Corps permits, and other approvals from responsible agencies, as applicable.

APPLICANT: The Newhall Land and Farming Company, a California Limited Partnership, an indirect subsidiary of Five Point Holdings, LLC, 25124 Springfield Court, Suite 300, Valencia, CA 91355.

POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROJECT: Based on a preliminary review of the Modified Project consistent with CCR Title 14, Section 15060, the County has determined that a SEIR should be prepared. Consistent with CCR Title 14, Sections 15063 and 15082, the County has identified the following probable environmental effects of the Modified

Project, which will be addressed in the SEIR for the Modified Project:

- Air Quality
- Biological Resources and Jurisdictional Waters
- Cultural Resources
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

These potential environmental effects are described in greater detail in the Initial Study prepared for the Modified Project. Alternatives will be evaluated to reduce environmental impacts that may be identified during the SEIR process. To provide a complete record of the County's environmental decision-making, environmental issues that do not rise to a level of significance will be addressed in the SEIR in a separate section entitled "Impacts Found to Be Less than Significant."

NOTICE OF SCOPING MEETING: The County will conduct a public scoping meeting for the purpose of soliciting oral and written comments from interested parties as to the appropriate scope and content of the SEIR.

All interested parties are invited to attend the scoping meeting to assist in identifying issues to be addressed in the EIR. The scoping meeting will include a brief presentation of the project to be addressed in the EIR and will provide attendees with an opportunity to provide input to the scope of the EIR. The virtual Scoping Meeting will be held online **Tuesday, October 19, 2021, at 6PM (Pacific Time)**, via **ZOOM** at the following link:

<https://zoom.us/j/92075537467>

Webinar ID: 920 7553 7467

Dial in only option (no video):
(669) 900-6833

Webinar ID: 920 7553 7467

Translation in other languages can be made available at the meeting upon request. Please submit translation requests at least seven business days in advance of each scheduled meeting to subdivisions@planning.lacounty.gov.

PUBLIC REVIEW PERIOD: In accordance with State CEQA Guidelines Section 15082(b), the comment period for the NOP begins on October 7, 2021, and ends on November 8, 2021.

Any comments provided should identify specific topics of environmental concern and your reason for suggesting the study of these topics in the SEIR.

DOCUMENT AVAILABILITY: The NOP and Initial Study are available for public review at the Los Angeles County Department of Regional Planning web addresses listed below and the following locations:

- Valencia Library, 23743 W. Valencia Boulevard, Santa Clarita
- Castaic Library, 27971 Sloan Canyon Road, Castaic
- Stevenson Ranch Library, 25950 The Old Road, Stevenson Ranch
- Old Town Newhall Library, 24500 Main Street, Santa Clarita
- Canyon Country Jo Anne Darcy Library, 18601 Soledad Canyon Road, Santa Clarita

The public is also encouraged to visit the Department of Regional Planning's website to review the Initial Study at: <https://planning.lacounty.gov/case/view/pm18108> (Valencia Commerce Center) and <https://planning.lacounty.gov/case/view/tr083582> (Entrada South). The State-certified EIR for the RMDP/SCP is available at <https://planning.lacounty.gov/case/view/rmdp>.

Thank you for your participation in the environmental review of this project. Please direct all written comments to the following address:

Mr. Jodie Sackett
Subdivisions
Department of Regional Planning
County of Los Angeles
320 W. Temple Street, Room 1362
Los Angeles, CA 90012
Tel: (213) 974-6433
Fax: (213) 626-0434
Email: subdivisions@planning.lacounty.gov



Signature of Lead Agency Representative

9-30-21

Date

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From: SCOPE <exec-scope@earthlink.net>
Sent: Wednesday, November 10, 2021 4:42 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Fw: Comment letter on entrada south NOP
CAUTION: External Email. Proceed Responsibly.

On Nov 8th, we sent this NOP comment, but did not receive a confirmation of receipt. Would you please send one? These comments were timely filed.

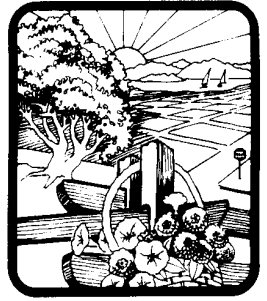
Thank you
Lynne Plambeck

-----Forwarded Message-----

From: SCOPE
Sent: Nov 8, 2021 3:59 PM
To:
Subject: Comment letter on entrada south NOP

Attached

SCOPE
Santa Clarita Organization for Planning and the Environment
TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY
AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY
POST OFFICE BOX 1182, SANTA CLARITA, CA 91386
www.scope.org



11-8-21

Attn: Jodie Sackett
Los Angeles Dept of Regional Planning
320 W. Temple St.
Los Angeles, CA 90012

Sent via email to: subdivisions@planning.lacounty.gov

Re: NOP Entrada South #083592

SCOPE and its members have commented extensively on Fivepoint's westside projects, including the Newhall Ranch Specific Plan, the Resource Management Plan and the previous draft Entrada South EIR released in 2015.

Tiering on the Resource Managtment Plan

While we concur with most of the areas listed by the County for future evaluation in the initial study, we believe that reliance on the Resource Management Plan for information on climate change/GHG emissions, aesthetics, traffic and any other omitted area is inappropriate. The Resource Management Plan was an overview document produced for a federal and state river alteration approval, and should not be substituted for the detailed project level study that provides public disclosure and ensures the development of mitigation measures that will be enforced by the County. According to CEQA, **mitigation measures must be "fully enforceable through permit conditions, agreements, or other measures" so "that feasible mitigation measures will actually be implemented as a condition of development."** (*Federation of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261 ((quoting Pub. Res. Code § 21081.6(b))).).

We note that the previously released draft EIR for Entrada did not attempt to tier on the Resource Management Plan even though it was an approved document at the time. Further, the developer did not attempt to and the County and the City did not allow tiering for its San Francisquito Creek projects on a similar overview plan, the Natural River Management Plan, as part of the review for those projects. It is now just as inappropriate to allow an overview document to be used for the detailed project specific analysis required for the current proposal.

Water Supply

While the Initial Study lists Utilities as an area which must be addressed in this document, we want to specifically state that water supply must be fully investigated and a new water supply assessment provided for this project in compliance with the CA Water Code

We are especially adamant that this information be included after reading and commenting on the SCV Sustainable Ground Water Agency's Ground Water Sustainability Plan¹ which forecasts severe drops in water level due to future development

“But the Groundwater Management Plan, Santa Clara River Valley Groundwater Basin, East Subbasin, Los Angeles County, California (Basin Operating Plan) described in Section 6 contemplates groundwater levels lower than historical levels during dry years, to accommodate future buildout, conjunctive use operating strategies, and climate change (LSCE, 2003). (emphasis added) (p. 8-4)

.....groundwater pumping may temporarily cause groundwater level declines of up to 150 feet in the future. (page 9-15)

As one of the plaintiff's in the litigation over the original 1999 Newhall Ranch Specific Plan, we have not forgotten that a major reason that document was set aside by the Court in 2000 was that it predicted a 10-foot drop in ground water levels, meaning downstream users and environmental needs would be receiving substantially less water. No such water level drop was disclosed or contemplated in the Resource Management Plan. This is obviously changed information and must be addressed in a new EIR.

Obligation to Address the Public Trust

Since the Ground Water Sustainability Plan predicts a major drop in ground water levels due in part to future demands from huge projects such as this as well as climate change, we believe the County and the developer are obligated to consider and disclose how such projects will affect the public trust resources, including navigable surface waters and fisheries. Groundwater hydrologically connected to surface waters is also subject to the Public Trust Doctrine to the extent that groundwater extractions or diversions affect or may affect public trust uses (*Environmental Law Foundation v. State Water Resources Control Board* (2018), 26 Cal. App. 5th 844; *National Audubon Society v. Superior Court* (1983), 33 Cal. 3d419).

Evaluation of water supply impacts should consider potential impacts to and appropriate protections for interconnected surface waters and their tributaries, and interconnected surface waters that support fisheries, including the level of groundwater contribution to those waters. Public Trust Doctrine considerations should carefully evaluate and protect environmental beneficial uses and users of groundwater, including fish and wildlife and their habitats, groundwater dependent ecosystems, and interconnected surface waters.

Inclusion of GHG/Climate Change Analysis

The Initial Study excludes a GHG analysis, instead relying on the Resource Management Plan. We believe that the impacts to climate change from auto-oriented projects such as Entrada South and the proposed commercial additions have substantially changed since the previous EIR, including increased emissions, occurrences of wildfire and reduced precipitation. The traffic study used in the Resource management Plan is now almost two decades old. Traffic patterns and commuter behavior have changed. Delivery truck traffic

¹ Santa Clarita Valley Ground Water Sustainability Plan, included by reference, may be accessed here: <https://share.gsiws.com/index.php/s/CrynwfbbiHFCqqT>

has become a substantial source of emissions. A new traffic study needs to be included that accurately assesses commuter traffic and includes traffic from other recent project approvals such as the huge landfill expansion approved in July of 2017, well after the previous EIR. Base line assumptions may need to be reevaluated regarding emissions to comply with new attainment goals.

Also, as part of the GHG section, the DEIR should include an analysis and inclusion of the mitigation report describing the outcomes for the existing GHG mitigation requirements for the approved Mission tract. This information is necessary so that the public and the decision makers may evaluate whether the proposed mitigation from this previously approved project is in actuality producing reduced climate emissions.

A new EIR must be prepared for review and comment whenever significant new information becomes known to the lead agency. Under such circumstances the lead agency is specifically required to re-notice the environmental review document to the public and all responsible agencies, and is required to obtain comments from the same, before certifying the document's impacts, its alternatives analyses, and any mitigation measures. (*See id.*; *see also*, Cal Pub. Res. Code § 21153.) A lead agency's decision not to include a required section of an EIR must be supported by substantial evidence. (CEQA Guidelines § 15088.5(e).)

"Significant new information" includes any information regarding changes in the environmental setting of the project under review. (CEQA Guidelines § 15088.5(a).) It also includes information or data that has been added to the EIR and is considered "significant" because it deviates from that which was presented in the document on which it is being tiered, depriving the public from a meaningful opportunity to comment upon a significant environmental effect of the project, or a feasible way to mitigate or avoid such an effect at the time of circulation of the draft. (*Id.*)

Some examples of when a lead agency may not rely on tiering an EIR:

- (1) When the new information shows a new, substantial environmental impact resulting either from the project or from a mitigation measure;
- (2) When the new information shows a substantial increase in the severity of an environmental impact
- (3) When the new information shows a feasible alternative or mitigation measure that clearly would lessen the environmental impacts of a project and the project proponent declines to adopt the mitigation measure;

Inadequate Public Notice

We believe that the public notice for this NOP was inadequate to provide the public with an opportunity to attend and make comments at the public scoping meeting. We did not receive notice of this meeting in the mail until just a few days prior to the meeting. Thus many people were prevented from attending the scoping meeting because they didn't know about it in time. This scoping notice was so rushed that the information sent out did not even have a project number assigned to it. Failing to give adequate public notice to ensure participation, begs the question of whether or not the County really wants to hear the public comment required by CEQA.

Conclusion

The DEIR must include sections on GHG, aesthetics and any other excluded section of the EIR. We believe that the Resource Plan, is not sufficient to address project level impacts for the above stated reasons, i.e. it is based on outdated or inapplicable studies and data.

Significant new information will substantially change the DEIR's analyses of the Project's impacts, alternatives and required mitigation, so these areas must be covered in the new document. (*Laurel Heights Improvement Assn. v. Regents of Univ. of Cal.* (1993) 6 Cal.4th 1112, 1132 (*Laurel Heights*).)

We believe updated studies on traffic, CO2 emissions and other GHG gases, biology and water supply that include an evaluation of a significant ground water level drop, fire and other safety hazards (such as a study regarding the safety of building on or near existing oil wells with a disclosure of County requirements and how they will be monitored and enforced) must be included in any new document.

We do not concur that the Climate chapter may be excluded.

Thank you in advance for your consideration of these concerns and thank you for your time.

Sincerely,

A handwritten signature in dark ink, appearing to read "Raymond O. Schubert". The signature is fluid and cursive, with the first name "Raymond" being more legible than the last name "Schubert".

President

From: Arthur Sohikian <arthur@avsconsultinginc.com>
Sent: Wednesday, October 20, 2021 8:07 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Cc: Don Fleming <dfleming@valenciaacura.com>; bffleming@valenciaacura.com
<bffleming@valenciaacura.com>; Stephanie Gurne <sgurne@valenciaacura.com>
Subject: Entrada South and Valencia Commerce Center (VCC) Project

CAUTION: External Email. Proceed Responsibly.

Hi Ms Sackett:

Attached is the Santa Clarita Valley Automobile Dealers Association regarding the Entrada South and Valencia Commerce Center (VCC) Project.

The comment letter is submitted by:

Don Fleming,

Valencia Acura

Owner/ General Manager

Santa Clarita Valley Auto Dealers Association

President

Business: (661) 255-3000

Cell: (661) 310-4840

Valencia Acura
Friendship™



Thanks!

Arthur Sohikian

Arthur V Sohikian

(213) 379-1551

@AVSConsultingLA





Santa Clarita Valley
Auto Dealers
Community Driven.

October 13, 2021

Jodie Sackett
Subdivisions
Department of Regional Planning
County of Los Angeles
320 W. Temple Street, Room 1362
Los Angeles, CA 90012
Fax: (213) 626-0434
subdivisions@planning.lacounty.gov

Dear Jodie Sackett,

I am writing on behalf of the Santa Clarita Automobile Dealers Association to express our strong support for next phase of the FivePoint Valencia community, the Entrada South and Valencia Commerce Center project. FivePoint Valencia is well on its way to being a tremendous benefit for our members, and the entire Santa Clarita Valley. As you know, we have a severe housing shortage in our region and statewide that is significantly holding back our economy. FivePoint Valencia is part of the solution, responding directly to that need.

The first homes at Valencia are already under development right now. The next proposed phase of the community will deliver 1,574 new homes, on top of more than 4 million square feet of commercial space. This next phase is an essential piece of the overall Valencia vision, which in total will create up to 21,500 new homes at full build-out, along with 11.5 million square feet of commercial space. Importantly, these new homes will be available at a variety of price points to ensure they are affordable to those at a wide range of income levels. What's more, we can already see that FivePoint Valencia is being developed to an incredibly high level of quality, safety, and environmental sustainability. Automobile dealers thrive when an entire community succeeds. FivePoint Valencia will create jobs, generate tax revenue, and provide the housing we need to propel our entire region forward. This proposed project has our full support.

Sincerely,

Phone. 661 255.3000 • Fax: 661 255.0591 • 23955 Creekside Rd , Valencia, CA 91355



From: ROW, TOR <TOR.ROW@pbfenergy.com>
Sent: Tuesday, November 23, 2021 10:39 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Cc: Alvarado, Dino A <DINO.ALVARADO@pbfenergy.com>; Hilyar, Charles S "Chuck" <CHARLES.HILYAR@pbfenergy.com>; Acuna, Joseph <JOSEPH.ACUNA@pbfenergy.com>; Flaniken, Nelson A <NELSON.FLANIKEN@pbfenergy.com>; Horton, Alan <Alan.Horton@pbfenergy.com>; Shinde, Teri <TERI.SHINDE@pbfenergy.com>
Subject: 21-7767 - Entrada South and Valencia Commerce Center (VCC) Project

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Sackett,

Pursuant to the request of dated October 7, 2021, pertaining to the above referenced project, please see the attached for Torrance Valley Pipeline Company LLC's response.

Best regards,

Eleanor Marx
Contract Right of Way Agent
Torrance Logistics Company LLC
12851 E. 166th Street
Cerritos, CA 90703
310 212 2914 Tel
310 977 9193 Mobile
310 212 1788 Fax
eleanor.marx@pbfenergy.com



**Torrance Valley Pipeline
Company LLC**
12851 East 166th Street
Cerritos, CA 90703
(310) 212-1794 Telephone
(310) 212-1788 Facsimile
www.pbfenergy.com

November 23, 2021

Attn: Ms. Jodie Sackett
County of Los Angeles
Department of Regional Planning,
Subdivisions
320 West Temple Street, Room 1362
Los Angeles, CA 90012

Re: Entrada South and Valencia Commerce Center (VCC) Project

Our File: 21-7767

Dear Ms. Sackett:

Pursuant to your request dated October 7, 2021, pertaining to the above referenced project, please be advised that Torrance Valley Pipeline Company LLC maintains one abandoned 16-inch pipeline (M-70), one idle 10-inch pipeline (M-70), one active 16-inch pipeline (M-70) and one abandoned 8-inch pipeline (M-1) within the vicinity of your proposed project. Additionally, Torrance Valley also maintains approximately one (1) Electrolysis Test Station (ETS) location within the vicinity of the proposed project. We are prepared to mark our facilities upon receiving 48-hour advanced Underground Service Alert (USA) notice.

Enclosed for your information are Torrance Valley drawings 4-A-1695B, 4-A-1696, 4-A-1695V, 4-A-1696V, D4A-5075 & 4-A-77 that depicts the general alignment of the above referenced pipelines. Upon completion of your final project drawings, we will look to you to provide us a detailed set of your plans for our review to determine if there is a conflict with our existing facilities.

Torrance Valley requires a representative to be on site during construction activities near our facilities. Therefore, you or your contractors are hereby notified to contact, in addition to the above referenced USA notice, Torrance Valley's designated representative at (310) 212-1842 or (714) 296-6259 between the hours of 6:30 A.M. and 3:30 P.M., Monday through Friday, a minimum of 48 hours in advance of commencing said construction activities.

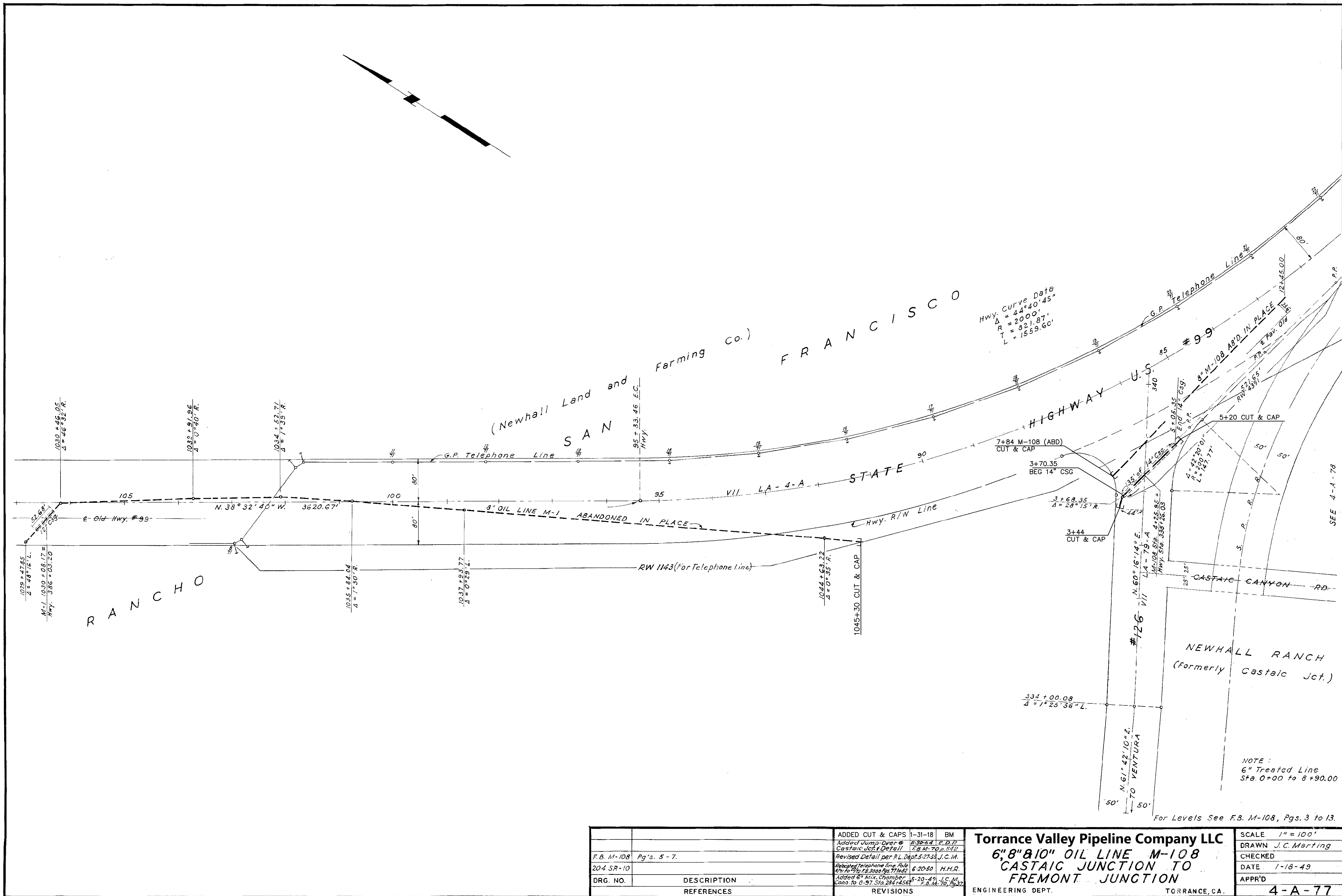
YOU ARE ADVISED THAT NO WARRANTY OR REPRESENTATION, EXPRESS OR IMPLIED, IS CONVEYED, AS TO THE ACCURACY OR COMPLETENESS OF ANY RECORDS OR INFORMATION HERETOFORE OR HEREAFTER FURNISHED TO THE COUNTY OF LOS ANGELES IN CONNECTION WITH THE TORRANCE VALLEY PIPELINE COMPANY LLC ASSETS AND ANY RELIANCE ON OR USE OF THE SAME SHALL BE AT THE COUNTY OF LOS ANGELES' SOLE RISK. Additionally, any and all Torrance Valley facilities identified as "Active", "Idle", or "Abandoned", unless otherwise clearly specified, remain the property of Torrance Valley Pipeline Company LLC, and that all activities affecting these facilities must be approved and controlled by Torrance Valley. Should it be determined that such Torrance Valley facility potentially interferes with your project this office must be notified immediately, at which time Torrance Valley personnel will review the issues to determine what actions will be necessary to identify and resolve any conflicts.

Please submit future project notifications to the undersigned at TOR.ROW@pbfenergy.com. If you have questions or require additional information regarding this submittal, please contact Ms. Eleanor Marx at (310) 212-2914.

Very truly yours,

Teri A. Shinde
Manager, Right of Way

Cc: D. Alvarado
C. Hilyar
J. Acuna
N. Flaniken
A. Horton



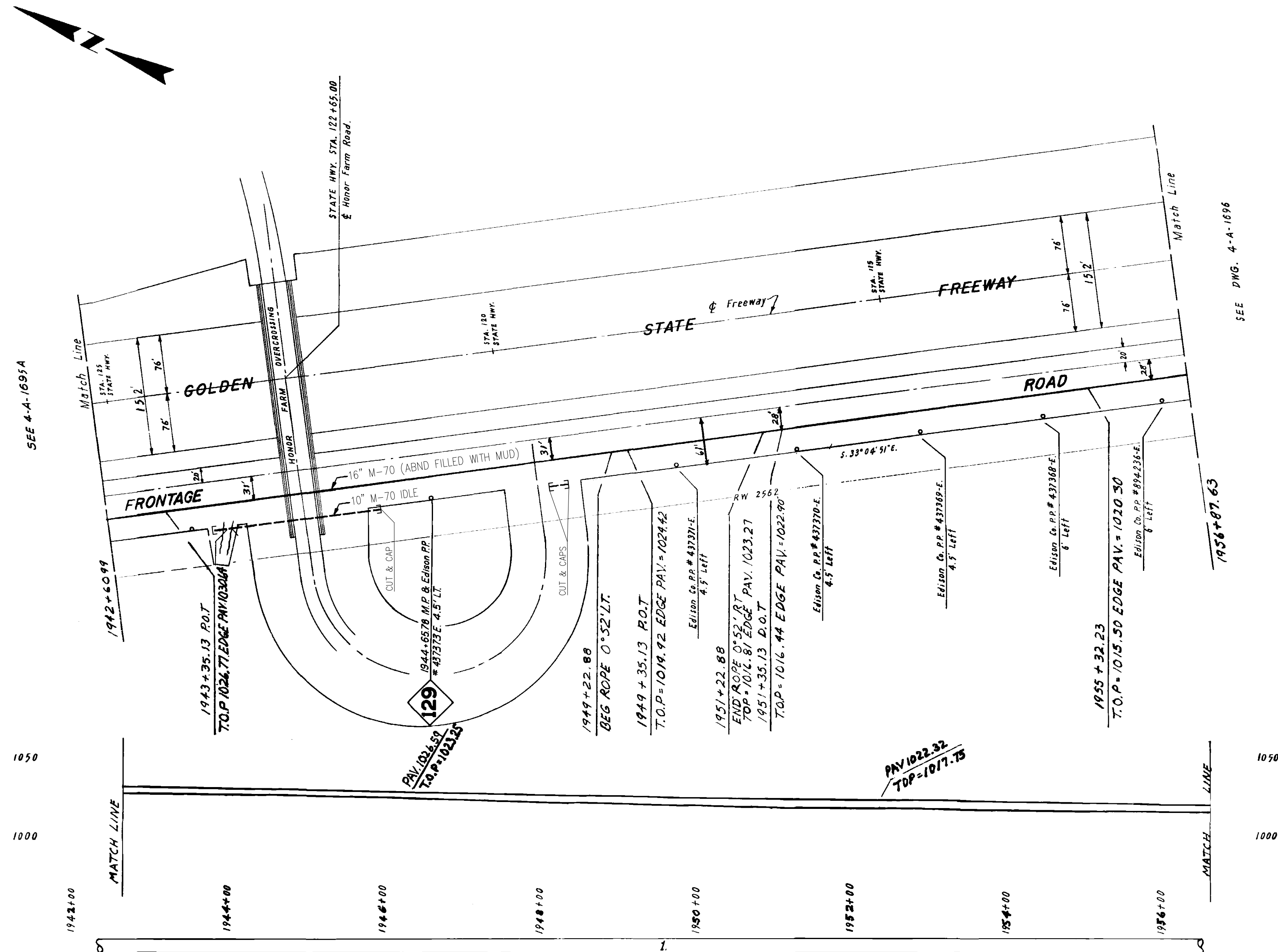
NOTE: THIS IS A C.A.D. PRODUCED DRAWING/DO NOT MAKE ANY MANUAL CHANGES TO ORIGINAL

COUNTY

OF

LOS

ANGELES



NOTE:
FOR DETAILS OF M-70 (IDLE) IN
THIS AREA, SEE DWG. 4-A-1695-V.

(ABND.) M-70

PIPE DATA

① 1942+60.99 TO 1956+87.16, 0.375" WALL, GR. 52, Y-G-III COATED, INST 1982

REVISIONS	
ADDED CUT & CAPS ON 10" IDLE M-70	3/20/19 BM
ADDED CUT & CAP ON 10" IDLE M-70	2-4-01 BM
ADDED "ABND FILLED WITH MUD CALLOUT"	7-19-99 BM
ABND. M-70	3-7-1982 BM
M-70 (IDLE) X-REF. ADDED	3-11-1982 E
RELOCATION E. INST. 16" PIPE	2-15-84 T.B
ADDED PIPE DATA	8-17-80 A.N.
Added Mile-Post	PAT 12-8-75

SYMBOLS

(M) -- ANODES
R -- RECTIFIER
O -- RUST HOLE
□ -- BAD PIPE
OR WELD
D -- ACCIDENTAL
DAMAGE

DIA. NO. DATE

NOTE BOOKS

CRUDE LINE
LEBEC TO TORRANCE

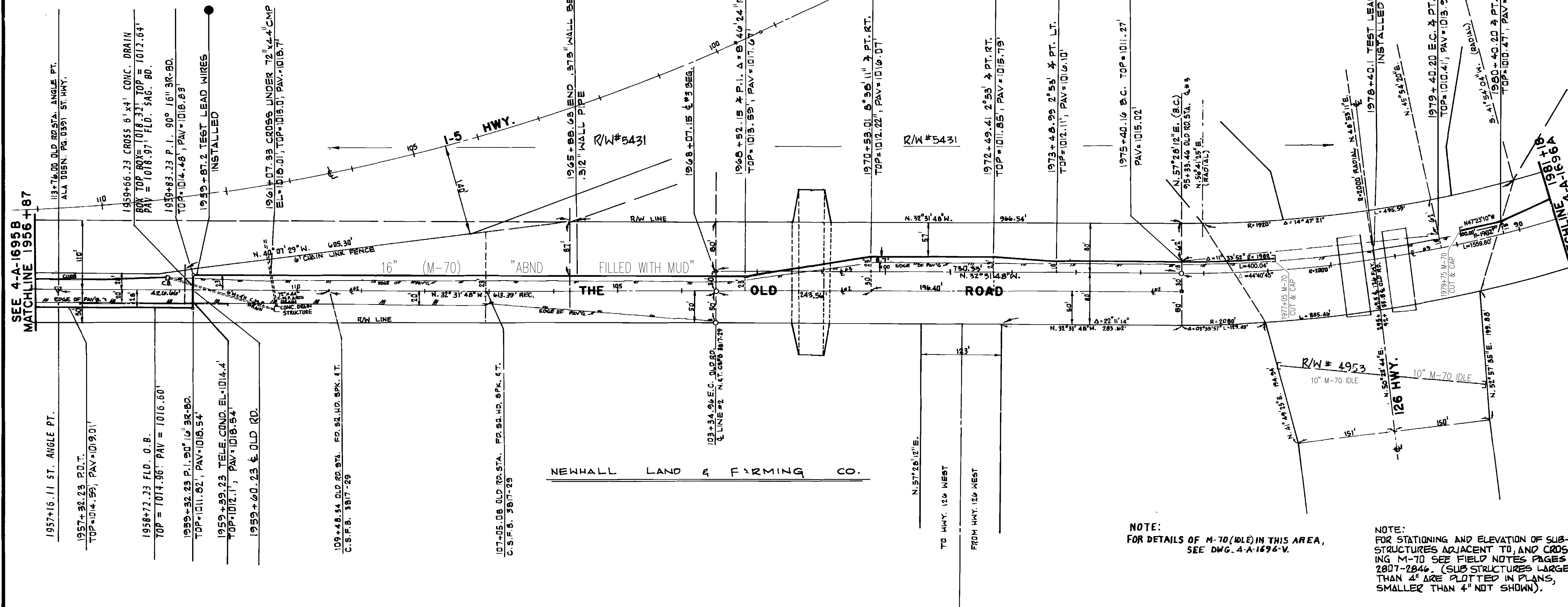
Torrance Valley Pipeline Company LLC

DESIGN ENGR.	APPROVED	DATE	DRAWING NO.
DRAWN H.J.M.		12-7-66	4-A-1695B
CHECKED			
SCALE	PLAN 1"=100'	PROFILE 1"=20'	

REDRAWN

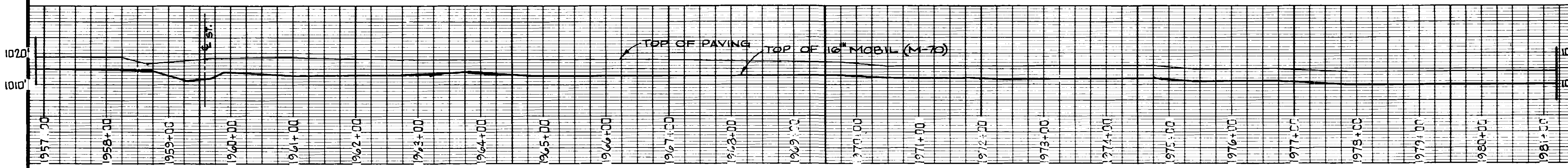
NOTE: THIS IS A C.A.D. PRODUCED DRAWING/DO NOT MAKE ANY MANUAL CHANGES TO ORIGINAL

COUNTY OF LOS ANGELES



NOTE:
FOR DETAILS OF M-70 (IDLE) IN THIS AREA,
SEE DWG. 4-A-1696-V.

NOTE:
FOR STATIONING AND ELEVATION OF SUB-
STRUCTURES ADJACENT TO, AND CROSS-
ING M-70 SEE FIELD NOTES PAGES
2807-2846. (SUB STRUCTURES LARGER
THAN 4\"/>



HYDROSTATIC PRESSURE TEST DATA				
DATE	SECTION TESTED	TEST PRESSURE	MAXIMUM WORKING PRESSURE	DURATION
10-10-83	TEMPLIN HWY - NEWHALL STA.	1140 P.S.I.G.	1125 P.S.I.G.	8 HRS.
9-30-88	TEMPLIN HWY - NEWHALL	1530	1224	8 HRS.

PIPE DATA
1. 1956+87 TO 1965+89, 16.00\"/>

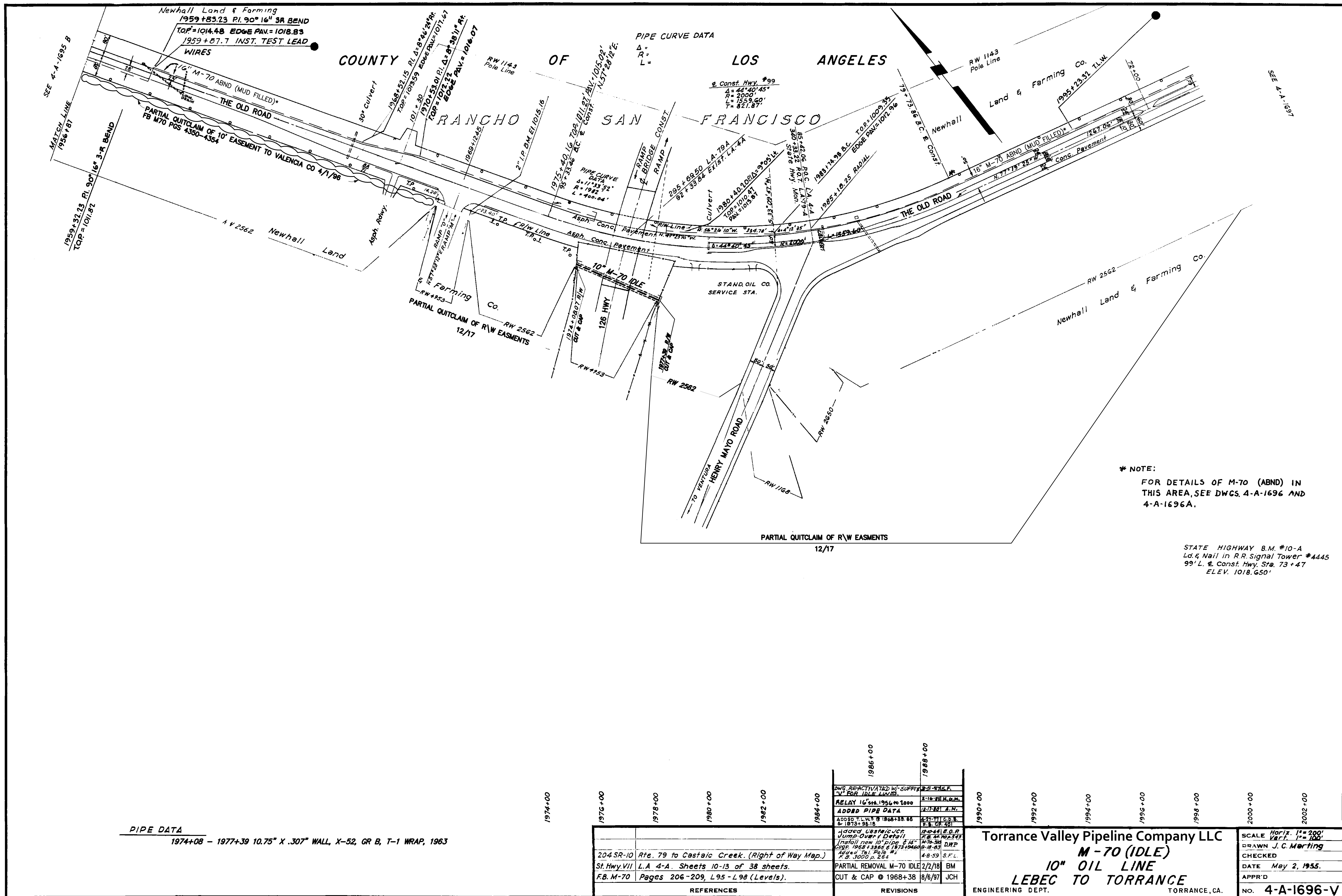
REVISIONS	
ADDED CUT & CAPS (IDLE M-70)	2-5-81 BM. W.O. 10364
ADDED CUT & CAP STATIONS 1977+05 AND 1979+75	4-11-81 AM W.O. 99472
ADDED CUT & CAP TO 10" IDLE M-70	2-6-81 BM. W.O. 99440
ADDED "ABND FILLED WITH MUD CALLOUT"	7-22-99 BM. W.O. 99490
ABND. M-70	3-3-94 BNC B F478-4179
ADDED PRES. TEST DATA	3-7-90 D.S.
M-70 (IDLE) X-RET ADDED	3-10-81 S.F.

SYMBOLS	
(M) -- ANODES	
R -- RECTIFIER	
● -- TEST LEAD WIRE	
□ -- BAD PIPE OR WELD	
D -- ACCIDENTAL DAMAGE	
DIA. NO. DATE	

16\"/>

(ABND.) M-70

REDRAWN



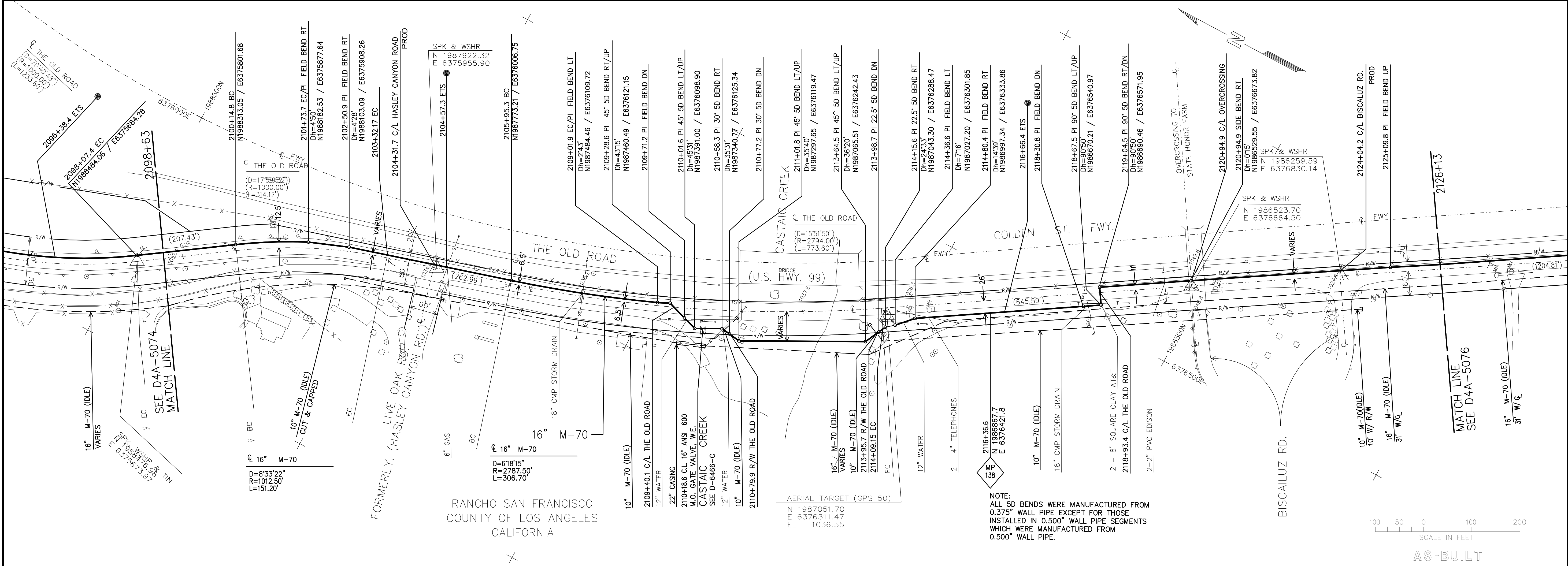
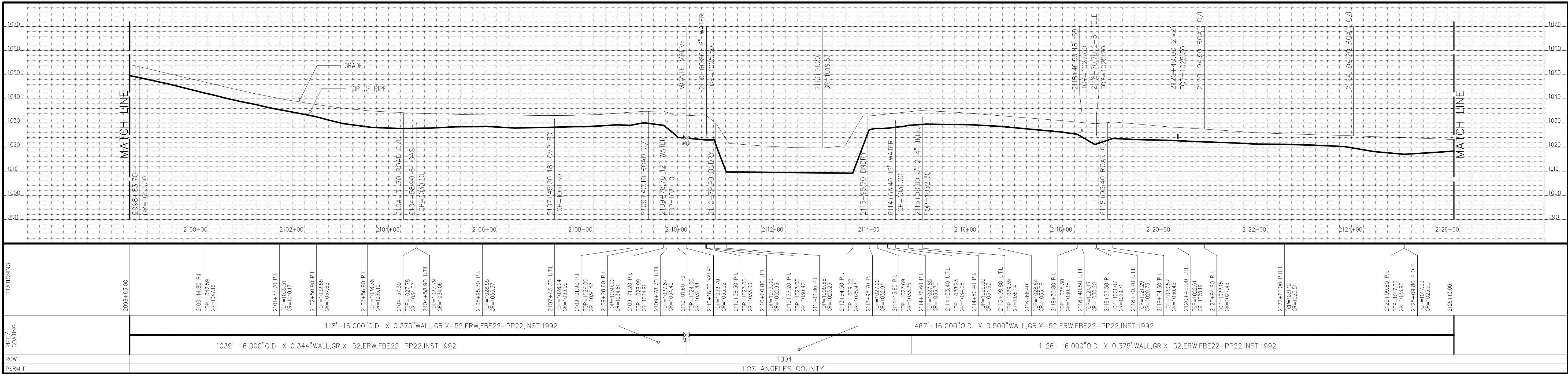
PIPE DATA
1974+08 - 1977+39 10.75" X .307" WALL, X-52, GR B, T-1 WRAP, 1963

REFERENCES		REVISIONS	
204 SR-10	Rte. 79 to Castaic Creek. (Right of Way Map.)	1986+00	DWG. REACTIVATED W/ SUFFIX "V" FOR IDLE LINES.
St. Hwy. VII	L.A. 4-A. Sheets 10-13 of 38 sheets.	1988+00	RELAY 10" ST. 1956 TO 1000
F.B.M-70	Pages 206-209, L.95-L.98 (Levels).	1990+00	ADDED PIPE DATA
		1992+00	ADDED T.L.W. 8 1968+38.65
		1994+00	ADDED T.L.W. 8 1973+98.18
		1996+00	ADDED U.S. 10" JUMP-OVER DETAIL
		1998+00	INSTALL NEW 10" PIPE 8 14" 14-30 DWP
		2000+00	ADDED TAIL POLE #1
		2002+00	PARTIAL REMOVAL M-70 IDLE
			CUT & CAP @ 1968+38

Torrance Valley Pipeline Company LLC
M-70 (IDLE)
10" OIL LINE
LEBEC TO TORRANCE
ENGINEERING DEPT. TORRANCE, CA.

SCALE Horiz. 1"=200'
VERT. 1"=100'
DRAWN J. C. Marting
CHECKED
DATE May 2, 1955.
APPR'D
NO. 4-A-1696-V

NOTE: THIS IS A C.A.D. PRODUCED DRAWING/DO NOT MAKE ANY MANUAL CHANGES TO ORIGINAL



HORIZ. DATUM: CALIFORNIA COORDINATE SYSTEM NAD 1983, ZONE 5										VERT. DATUM: NGVD 1929				NOTE: THIS INFORMATION SHOWN HEREON IS FURNISHED WITHOUT LIABILITY ON THE PART OF TORRANCE VALLEY COMPANY LLC FOR ANY DAMAGES RESULTING FROM ERRORS OR OMISSIONS THEREIN										<input type="checkbox"/> APPROVED FOR CONSTRUCTION <input type="checkbox"/> IFBP: CHANGED ALIGNMENT <input type="checkbox"/> ISSUED FOR BID PURPOSES <input type="checkbox"/> IFPP: 5D BENDS/ADDED .344" & .500" W.T. <input type="checkbox"/> ADDED MILEPOST MARKERS				<div>3/18/92 LPA WEH 3/17/92 JCH WEH 2/10/92 JCH WEH 11/25/91 JCH WEH 1/12/98 JCH 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From: Kayla Koerting <Kayla@vica.com>

Sent: Monday, October 18, 2021 9:40 PM

To: DRP Subdivisions <subdivisions@planning.lacounty.gov>

Cc: Stuart Waldman <stuart@vica.com>

Subject: Entrada South and Valencia Commerce Center (VCC) Project – SUPPORT

CAUTION: External Email. Proceed Responsibly.

October 18, 2021

Mr. Jodie Sackett, Senior Planner

County of Los Angeles Department of Regional Planning

320 W Temple Street

Los Angeles, CA 90012

SUBJECT: Entrada South and Valencia Commerce Center (VCC) Project – SUPPORT

Dear Mr. Sackett,

The Valley Industry and Commerce Association (VICA) strongly supports the next phase of FivePoint Valencia, which will help address the local housing crisis and provide necessary infrastructure to create thousands of jobs in the County.

By building housing stock at a variety of economic price ranges, FivePoint will address the region's most urgent need – housing demand. This community promises nearly 21,500 homes, expanding housing accessibility and diversity in the region.

In addition, the next phase of FivePoint Valencia will deliver 1.5 million square feet of commercial space, providing room for businesses within the vicinity of a diverse new community. This infrastructure has the potential to create, and sustain, thousands of jobs in the region, and has an impressive jobs-to-housing projection of 3:1.

Finally, FivePoint Valencia achieves these impressive goals while setting a new standard for sustainability, achieving net-zero greenhouse gas and zero net energy in its homes and buildings through a variety of on- and off-site investments. In doing so, the project will protect the environment, foster community, and drive economic growth in ways that benefit residents and businesses alike.

As the most influential business advocacy group in Southern California, VICA is dedicated to advancing the economic vitality of our member businesses and the livelihoods of all Angelenos. In this case, our mission leads us to support the promise of FivePoint Valencia's exciting next chapter.

We urge you to support the next phase of Five Point Valencia and the positive impacts that it will have on our local economy.

Sincerely,



Brad Rosenheim
VICA Chair



Stuart Waldman
VICA President



October 18, 2021

Mr. Jodie Sackett, Senior Planner
County of Los Angeles Department of Regional Planning
320 W Temple Street
Los Angeles, CA 90012

SUBJECT: Entrada South and Valencia Commerce Center (VCC) Project – SUPPORT

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Sincerely,

Brad Rosenheim
VICA Chair

Stuart Waldman
VICA President

From: Kathy Norris <kathy@via.org>
Sent: Tuesday, October 19, 2021 11:39 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Entrada South and Valencia Commerce Center (VCC) Project.

CAUTION: External Email. Proceed Responsibly.

Please accept the attached letter as the Valley Industry Association's support of the Entrada South and Valencia Commerce Center (VCC) Project and as pertaining to tonight's Virtual Scoping Meeting.

Kathy Norris
CEO/President
Valley Industry Association
28368 Constellation Road, Suite 360
Valencia, CA 91355
(661) 294-8088
kathy@via.org



October 19, 2021

Mr. Jodie Sackett
Department of Regional Planning
320 W. Temple Street, Room 1362
Los Angeles, California 90012

Re: Entrada South/VCC Project

On behalf of the Valley Industry Association (VIA), I am writing to express my sincere support for the FivePoint Valencia development. Our organization looks forward to the many ways this historic investment will benefit residents and local businesses.

The Valley Industry Association represents and supports businesses throughout the Santa Clarita Valley. We serve as legislative advocates, provide relevant business information, support local educational initiatives, and deliver our members with networking opportunities. Our members are the heart and soul of the Santa Clarita Valley business community.

We are excited by the promise of FivePoint Valencia's Entrada South/VCC phase, which will deliver 4 million square feet of commercial space. In total, the full FivePoint Valencia community will include 11.5 million square feet of commercial space – a significant total that will deliver outstanding space for Santa Clarita Valley businesses to grow and thrive.

This commercial space will help create thousands of jobs and raise significant tax revenue for the area. FivePoint Valencia will ultimately 74,000 permanent jobs at buildout and provide LA County with substantial tax revenue to support public services and a more vibrant community.

With these benefits in mind, we are proud to stand behind the next phase of FivePoint Valencia.

Sincerely,


Kathy Norris
CEO/President
Valley Industry Association

From: Sue Arellano <sue.arellano@gmail.com>
Sent: Monday, November 1, 2021 11:20 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Entrada South and Valencia Commerce Center (VCC) Project

CAUTION: External Email. Proceed Responsibly.

Dear Mr. Sackett –

I am writing in support of FivePoint Valencia's strong commitment to addressing the state's intensifying housing and environmental challenges. This community sets the standard for forward-thinking and innovation in the face of urgent needs. In short, it is a tremendous asset for our region. Southern California faces tremendous challenges related to delivering enough housing for its residents. Some estimates put the statewide housing deficit at more than 3 million units. FivePoint Valencia represents a critical solution for our region and state, with a variety of home choices under development and some 1,500 new residential units slated for its next phase, Entrada South. These homes are greatly needed to continue this momentum.

Further, FivePoint Valencia is delivering an impressive mix of sustainability elements designed to make it the largest community of its kind to achieve net zero greenhouse gas emissions and net zero energy for homes and buildings. These efforts include sweeping electric vehicle infrastructure, geothermally heated swimming pools at Confluence Park, and partnerships with blue-chip environmental organizations. FivePoint Valencia sets the standard for climate-friendly communities in California and beyond.

New jobs, new homes, and a new standard for environmental sustainability represents the very best of the Santa Clarita Valley. The Entrada South/VCC phase of this community marks an important next step toward achieving this vision, and I urge your support of FivePoint Valencia moving forward.

Sincerely,

Sue Arellano
Santa Clarita, CA

From: Fred Arnold <fred.arnold@affloans.com>
Sent: Tuesday, October 19, 2021 9:35 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Cc: Fred Arnold <fred@fredarnold.com>
Subject: Entrada South and Valencia Commerce Center (VCC) Project

CAUTION: External Email. Proceed Responsibly.

Hi Jodie, please see my comments attached concerning the FivePoint Valencia housing project.

Thank you,
Fred Arnold

Need to send me a file securely? [Click Here](#)



Fred Arnold

Certified Mortgage Consultant (CMC)
DRE License # 01215943/01173600
NMLS # 1850/214841
Direct: (661) 505-4300
Fax: (661) 284-1163



American Family Funding

a Division of American Pacific Mortgage

A Direct Lender

28338 Constellation Road, Suite 900

Santa Clarita, CA 91355

[Apply Now](#)

Fred Arnold – Testimony.

Good evening,

My name is Fred Arnold, and I live and work in the Santa Clarita Valley.

As a mortgage professional at American Family Funding in Santa Clarita and the past president for the California Association of Mortgage Brokers, I have a deep understanding of our region's tremendous housing needs. That's why the next phase of FivePoint Valencia has my full support.

California is in the midst of a staggering housing deficit of approximately 3 and a half million homes, including hundreds of thousands in LA County. FivePoint Valencia is a much-needed response to this overwhelming need, with 4,000 homes previously approved for the first village.

This next chapter will only add to that momentum, with another 1,574 homes proposed for the Entrada South/VCC phase. FivePoint Valencia will provide roughly 21,500 homes at build-out, which will serve families and individuals from varied economic backgrounds.

As I've said before, my approach to mortgage lending has long been to educate those less economically advantaged understand that achieving the dream of home ownership also allows them to secure their fixed cost of housing as compared to when they rent, their rents are always going up and they are not building wealth for their families. If we can help more less economically advantaged families purchase homes they will get out of the spiraling effects of renting and being hostage to rising housing and rent prices. Far too many Californians struggle to achieve their housing dreams.

FivePoint Valencia helps address that challenge.

Thank you.

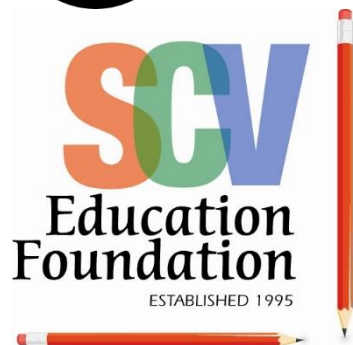
From: Jim Backer <JBacker@jsbdev.com>
Sent: Tuesday, October 19, 2021 5:32 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Entrada South/VCC

CAUTION: External Email. Proceed Responsibly.

Jodie,
Please see letter attached to support Entrada South by Five Point.
Thanks,
Jim
James S. Backer



27651 Lincoln Place, Suite 200
Santa Clarita, CA 91387
(661) 255-3275





October 19, 2021

Mr. Jodie Sackett
Subdivisions
Department of Regional Planning
County of Los Angeles
320 W. Temple Street, Room 1362
Los Angeles, CA 90012
Fax: (213) 626-0434

By E-mail to subdivisions@planning.lacounty.gov

RE: Entrada South/VCC

My name is Jim Backer, a local resident, and I am writing today to express my support for FivePoint Valencia's next phase – Entrada South/VCC. As a Santa Clarita Valley resident and person involved in the community for over 37 years, I have a deep fondness for this community, and it's very reassuring to know its best days may still be ahead.

FivePoint Valencia and all that it represents are a big reason why we can provide housing for young families and others moving from Los Angeles or the existing community. As our region and state face a severe and worsening housing crisis – short some 3 million homes statewide – FivePoint Valencia is delivering new homes at a steady rate, with approximately 1,300 homes under construction right now. FivePoint is implementing a vision that's already been reviewed and approved, with care, precision, and attention to detail. Further, their work is consistent with One Valley, One Vision, meaning it aligns with the plan and direction of the region. Almost thirty years have passed since this project was first envisioned and the original land ownership stretches back almost 150 years. The environmental goals and programs that are being incorporated into the community are truly remarkable.

This community will be an amazing pillar of the Santa Clarita Valley and it will allow the community to welcome a variety of new residents to call Valencia home.

Sincerely,

James S. Backer
President

From: David Bossert <bossert.dave13@gmail.com>
Sent: Thursday, October 21, 2021 12:45 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Cc: Sandy Sanchez <Sandy.Sanchez@fivepoint.com>; David Bossert <bossert.dave13@gmail.com>
Subject: RE: FivePoint Valencia/Entrada South & Valencia Commerce Center Support Letter

CAUTION: External Email. Proceed Responsibly.

Dear Mr. Sackett,

Attached is a PDF of my letter of support for the FivePoint Valencia: Entrada South and completion of the Valencia Commerce Center.

This letter is a hard copy of my testimony at the October 19, 2021, scoping session for the aforementioned projects.

Thank you,

-Dave Bossert

www.davidbossert.com

Bossert.dave13@gmail.com

818.599.6065

David Bossert
25641 Shaw Place
Stevenson Ranch, CA 91381

Mr. Jodie Sackett
County of Los Angeles
Department of Regional Planning
Land Divisions Section
320 Temple Street, Room 1361
Los Angeles, CA 90012

October 19, 2021

RE: Support for FivePoint Valencia
Entrada South Village/ Valencia Commerce Center

Dear Mr. Sackett,

I have been a resident of the Santa Clarita Valley for nearly 40 years. I am the immediate past president of the West Ranch Town Council. I care deeply about this community and its future.

I recently toured the FivePoint Valencia community and was deeply moved by what I saw and the positive impact that this community is having in Santa Clarita Valley. FivePoint Valencia is community reimagined.

In addition to admiring the beautiful new homes and expansive open space, my visit took me to the new Confluence Park, including a gorgeous community center complete with rooftop solar panels. Large, mature trees and heritage oaks dot the park and surrounding neighborhoods. The park also included a community garden-- an acknowledgment of the site's deep connections to nature, the environment, and sustainability.

I think that the focal point of FivePoint Valencia is its environmental stewardship. It aims to achieve net-zero greenhouse gas emissions and zero net energy for homes and buildings through a broad mix of on-site and off-site sustainability investments, including solar energy, electric vehicle infrastructure, methane capture, forest preservation, and more. This new community is a magnificent story that L.A. County leadership should be

proud of and should share far and wide. The community of tomorrow is happening today at FivePoint Valencia.

Further, I was excited to learn that FivePoint Valencia will preserve 10,000 acres of open space – that's two-thirds of the entire community – including habitat preserves for heritage oak trees and more.

Even more importantly, FivePoint Valencia is delivering new homes at a time when California is in desperate need of additional housing. The FivePoint Valencia community includes an impressive 3-to-1 job to housing balance at complete build-out, reducing commute times, and improving the lives of many families and individuals.

It is these types of commitments that make residents proud of their community. The next phase of the community – Entrada South village and completion of the Valencia Commerce Center – is an essential step toward helping FivePoint Valencia reach its full potential. It's a future that will strengthen the entire valley community.

I fully support Entrada South village and Valencia Commerce Center and hope you will too.

Sincerely,

A handwritten signature in black ink, appearing to read "David Bossert". The signature is fluid and cursive, with a large initial "D" and "B".

David Bossert

From: Eli Bronwein <ebronwein@gmail.com>
Sent: Thursday, October 28, 2021 9:49 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Entrada South project

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Sackett:

First, I don't understand why this is only a supplemental Environmental Impact Report in view of the substantial affects this project will have on our community. Increased traffic on the I-5 would add to the noise and air pollution. We are currently experiencing a serious drought, yet there are plans to build 1,574 housing units and commercial buildings. Where is the water to supply those homes and facilities going to come from? And what about the abandoned oil wells that are located within the development zone? Are there adequate protections in place? Climate change and GHG gases are not even listed as a subject to address. How can this be? Please address these issues and add me to the notification list for the Environmental Impact report.

Thank you

Elliot Bronwein
Santa Clarita, CA 91321

From: alex dosh <adosh86@gmail.com>
Sent: Friday, October 29, 2021 10:33 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Entrada South project

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Sackett:

First, we do not understand why this is only a supplemental Environmental Impact Report in view of the substantial affects this project will have on our community. Traffic has increased immensely on the I-5, adding to the noise and air pollution. The water shortage will only continue with more houses and landscapes. Climate change and GHG gases are not even listed as a subject to address. How can this be? Please address these issues and add me to the notification list for the Environmental Impact report. Please slow down/ end the destruction of the surrounding mountains and urban sprawl.

Thank you

Alexander Dosh

From: KATA FORD <kataford@aol.com>

Sent: Monday, November 8, 2021 11:14 PM

To: DRP Subdivisions <subdivisions@planning.lacounty.gov>

Subject: ATTN: Jodie Sackett re: SCOPING MEETING FOR ENTRADA SOUTH AND THE VALENCIA COMMERCE CENTER

CAUTION: External Email. Proceed Responsibly.

Environmental considerations that need to be included are:

#1 - The Entrada South EIR needs to acknowledge what happened with the water tank in Westridge and make sure there are clear measures in place so this toxic environmental disaster does not happen again in further developing FivePoint Valencia/Newhall Ranch. There are additional water tanks that are planned to be built for this development, and I want to see clearly spelled-out conditions in place for the construction of water tanks and include WHO the responsible party for the tank is, WHO the agency is that needs to be contacted with issues arising in the construction of the tank, and mitigation measures for sandblasting that will be done on the water tanks. TARPING ANY SANDBLASTING NEEDS TO BE REQUIRED, along with timely and proper collection and disposal of waste material.

#2 - Air quality issues from grading. STOP GRADING when winds pick up, and INCREASE watering trucks. What is being done now is NOT sufficient. Install third-party, permanent air monitoring stations along the border of Westridge and Entrada South. We're already experiencing poor air quality from Mission Village which is further from us. Grading Entrada South will cause worse conditions since it will directly border our community.

#3 - Added traffic and pollution caused.

#4 - Noise issues from work being done OUTSIDE OF permitted hours, which has happened on multiple occasions at Mission Village and even TODAY, November 5th, which we have video of. Noise from machines at the project when they go off in the middle of the night and continue into the next day when someone finally shows up to turn it off.

#5 - Noise levels during the active grading and construction of Entrada South since this will be done right next to residential homes.

#6 - A new study needs to be conducted for the "housing crisis". The 2020 Census results show near historically low population growth and a first-ever congressional seat loss for California. I want to see this new Census data reflect the reality of the housing situation, and an end to the "housing crisis" mantra proponents for development are pushing. Enough people LEFT THE STATE to cause a Congressional seat lost and redistricting is currently underway. I also want to see how Entrada South will benefit the homeless people and current homeless crisis we ARE seeing. It's not a "housing crisis," it's an AFFORDABLE housing shortage. This development will do little to nothing to address that.

Katarina Ford

From: Bruce Fortine <fortune@earthlink.net>
Sent: Monday, October 18, 2021 11:33 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Bruce Fortine Letter re FivePoint Valencia Scoping

CAUTION: External Email. Proceed Responsibly.

Dear Commissioners: for your consideration.

Thank you, Bruce

Bruce D. Fortine, M.Ed.

Box 800489

Santa Clarita, CA 91380-0489

(661) 253-0060 office

(661) 714-8382 cell/text

fortune@earthlink.net

U.S. Army Veteran

Bruce D. Fortine

October 15, 2021

Dear Commissioners,

As a Santa Clarita Valley resident and founding member of the Board of Trustees of the College of the Canyons, I am writing in personal support of the next phase of the FivePoint Valencia community.

Let me begin by saying that we all share an obligation to make life better for our children. But buying a home, for example, has become much more difficult. Why? Because of a severe housing shortage in our County and state, which has driven housing prices sky high. Some estimates put California's shortage upwards of 3 million homes. How do we solve this? How do we ensure the "American Dream" lives on?

FivePoint Valencia answers those questions with its sustainable new community currently under development in the Santa Clarita Valley. Unlike other communities, where the houses might be too expensive for the average new homeowner, these new units begin in the \$400,000 range -- far below the state and County average. With affordable, environmentally friendly homes, FivePoint Valencia is the solution that we desperately need right now.

On a personal note for Entrada South residents, the secondary schools in our valley (elementary through high school) are top-notch and very highly rated. At the college level, within driving distance of one to three miles, are College of the Canyons, California Institute of the Arts and the Masters University. College of the Canyons also has several major universities on campus that offer Bachelors, Masters and Doctoral degrees within one mile of Entrada South. The Valencia Commerce Center provides quality job opportunities for residents.

Please join me in supporting the Entrada South and Valencia Commerce Center portion of this project. I have personally owned several homes in previous Valencia projects and highly recommend ownership to family and friends!

Sincerely,


Bruce D. Fortine

From: Deanna Hanashiro <deannahanashiro@gmail.com>

Sent: Monday, November 8, 2021 7:33 AM

To: DRP Subdivisions <subdivisions@planning.lacounty.gov>

Subject: Request for a full Environmental Impact Report for Entrada South Project #083582

CAUTION: External Email. Proceed Responsibly.

November 7, 2021

Dear Los Angeles Dept. of Regional Planning Staff,

Entrada South Project #083582 is of concern. Please produce a full Environmental Impact Report for the Entrada South Development and additions to the Commerce Center.

My understanding is the County is proposing to produce only a supplemental EIR to the Resource Management Plan which is a state and federal document, not a county document. How will the County enforce conditions of approval?

Will Climate Change be addressed?

Since we are in the middle of a drought, where will the water come from?

Is it safe to build homes over abandoned oil wells?

Traffic on Interstate 5 is already bad. We received a notice recently that construction will begin on the 5 that will last several years.

Is the tight housing market already overbuilt? CNBC reported that analyst Dennis McGill of Zelman and Associates believes so. It surely seems office space in Santa Clarita is overbuilt. Two newly constructed office buildings have remained vacant for years and have never been occupied. One is located on Soledad Canyon Road next to the old Facey Medical building. The other is at the corner of Wiley Canyon Road and Orchard Village Road.

Please address these concerns before approving Entrada South Project #083582.

Thank you,
Deanna Hanashiro
Santa Clarita resident

From: Scott Heffernan <ScottHeffernan@scvedc.org>
Sent: Tuesday, October 19, 2021 8:52 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Entrada South and Valencia Commerce Center (VCC) Project

CAUTION: External Email. Proceed Responsibly.

Hello,

Please find attached my letter of support for the new FivePoint Project at Entrada South and the Valencia Commerce Center.



Scott Heffernan

Marketing Associate

O: 661.288.4400 | D: 661.288.4408

E: scottheffernan@scvedc.org | scvedc.org



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POWERED BY SCVEDC

Hello--

My name is Scott Heffernan. I work at the Santa Clarita Valley Economic Development Corporation and have been a proud resident of Santa Clarita for over 25 years.

Santa Clarita has grown consistently in size and population for a long time now and will only continue to do so. I've visited numerous places across the country but have never found somewhere else I'd rather move to and settle down. There is so much that this valley has to offer, so it's no wonder everyone wants to move here. Unfortunately, we share a similar problem with a lot of California in that there simply is not enough housing and space to go around.

I believe FivePoint Valencia will raise the bar for all master-planned communities from here on out, and help address the growing demand here for residential housing. Not to mention the MUCH needed commercial and industrial space that will allow for even more businesses to either move to or open for the first time right here in SCV.

FivePoint is a pioneer in building sustainable, innovative communities of the future. We're fortunate to have its footprint emerging in our own backyard. The sustainability investments to be made throughout this community and beyond its borders are remarkable: thousands of new EV charging stations, home energy retrofits in disadvantaged neighborhoods, the preservation of a 170-acre forest, a major methane capture program at a Central Valley dairy farm, and more.

These measures are in addition to the roughly 10,000 acres of open space the community is preserving, including habitat preserves for the rare San Fernando Valley Spineflower as well as beautiful oak trees and other heritage trees.

The Valencia project has my full support as a longstanding citizen invested in our valley prospering, and I hope you will lend your support as well!

Thank you.

Sincerely,

Scott Heffernan

From: Megan Manning <Megan.Manning@Kaizensurgical.com>
Sent: Tuesday, November 9, 2021 12:20 AM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Attn: Jodie Sackett RE: Scoping Meeting for Entrada South and the Valencia Commerce Center

CAUTION: External Email. Proceed Responsibly.

Some of our community's response to the scoping meeting have been captured and condensed in the attachments. Attached are 151 signatures of residents who want environmental considerations addressed in the EIR. Building 1500+ units can do a lot of damage to the existing homeowners' property and our environment. We are concerned about air quality, climate change, the Santa Clara River, water supply, houses may be built on top or near oil wells as well as more traffic. The second attachment includes specific reasons why Entrada South should not be built and if it does, why it should not start until the proper preventative measures are in place.

Air quality has been a major problem in the surrounding communities of this new development. The lack of air quality monitoring does not capture the poor air our community consumes on a daily basis due to the enormity of this grading/development project. We need permanent monitoring systems in place before digging begins.

Please acknowledge receipt of this email.

Thank you,
Megan Manning

Name	City	State	Postal Code	Country	Signed On
Megan Manning	Valencia	CA	91381	US	11/3/2021
Lynne Plambeck	Newhall	CA	91321	US	11/3/2021
Alex Dosh	Santa Clarita	CA	91355	US	11/4/2021
Cher Gilmore	Canyon Country	CA	91351	US	11/4/2021
Susann Rizzo	Valencia	CA	91355	US	11/4/2021
Elliot Bronwein	Newhall	CA	91321	US	11/4/2021
Susie V Kaufman	Santa Clarita	CA	91321	US	11/4/2021
Alyssa Banko	Stevenson Ranch	CA	91381	US	11/4/2021
Jamie Brown	Santa Clarita	CA	91350	US	11/4/2021
George DeMott	Newhall	CA	91321	US	11/4/2021
Iu madar	Canyon Country	CA	91387	US	11/4/2021
Glenda Nowakowski	Castaic	CA	91384	US	11/4/2021
Arthur Tom	santa clarita	CA	91354	US	11/4/2021
Sandy Cho	Valencia	CA	91354	US	11/4/2021
Heather D'Angelo	Valencia	CA	91354	US	11/4/2021
Beth Lipari	Newhall	CA	91321	US	11/4/2021
Alisa Hudson	Stevenson Ranch	CA	91381	US	11/4/2021
Allison Kickel	Denver	CO	80238	US	11/5/2021
Chad and Ann Hazard	Valencia	CA	91381	US	11/5/2021
Brian Manning	Los Angeles	CA	91381	US	11/5/2021
stacy fortner	Santa Clarita	CA	91354	US	11/5/2021
Eileen Conway	Valencia	CA	91355	US	11/5/2021
CATHERINE KIM	Los Angeles	CA	90012	US	11/5/2021
Senaida Sanchez	Simi Valley	CA	93065	US	11/5/2021
Prasad Su	Valencia	CA	91354	US	11/5/2021
jaime soliz	Santa Clarita	CA	91350	US	11/5/2021
Dale Sahm	Santa Clarita	CA	91350	US	11/5/2021
Susana Rovero	Castaic	CA	91310	US	11/5/2021
Larry McKinley	Santa Clarita	CA	91354	US	11/5/2021
Marivick Schulz	Santa Clarita	CA	91350	US	11/5/2021
Florinda Dayao	Moreno Valley	CA	92551	US	11/5/2021
Selva Rodriguez	Canyon Country	CA	91351	US	11/5/2021
Bonnie Eaton	Canyon Country	CA	91387	US	11/5/2021
Traci Morrone	Santa Clarita	CA	91390	US	11/5/2021
Kathi FastnowDirkse	Saugus	CA	91350	US	11/5/2021
Courtney Jines	Santa Clarita	CA	91350	US	11/5/2021
Ninva Younan	Valencia	CA	91355	US	11/5/2021
ashkhen khachatryan				US	11/5/2021
Ingrid Van Dorn	Stevenson Ranch	CA	91381	US	11/5/2021
Eden McClellan	Valencia	CA	91354	US	11/5/2021
Carolina Mendoza	Valencia	CA	91355	US	11/5/2021
Frank Alli	Canyon Country	CA	91351	US	11/5/2021
Jennifer Heinisch	Valencia	CA	91355	US	11/5/2021
Carrie French	Newhall	CA	91321	US	11/5/2021
Carla Cervantes	North Hollywood	CA	91605	US	11/5/2021
Tim Kelly	Canyon Country	CA	91387	US	11/5/2021
Robin Baerg	Canyon Country	CA	91387	US	11/5/2021

Name	City	State	Postal Code	Country	Signed On
william Mere	Castaic	CA	91384	US	11/5/2021
Susan DeLeon	Valencia	CA	91354	US	11/5/2021
Thora VanDerwilt	Canyon Country	CA	91387	US	11/5/2021
Firoozeh Erfani	Santa Clarita	CA	91350	US	11/5/2021
Lissa Brassfield	Newhall	CA	91321	US	11/5/2021
Rodney Quadras	Valencia	CA	91354	US	11/5/2021
Atiya Khan	Valencia	CA	91355	US	11/5/2021
Steve Kassel	newhall	CA	91321	US	11/5/2021
Naomie Moore	Castaic	CA	91384	US	11/5/2021
Kevin Rogers	Valencia	CA	91355	US	11/5/2021
Michelle Maghalyan	Valencia	CA	91354	US	11/5/2021
Fabian Lizarraga	Santa Clarita	CA	91390	US	11/5/2021
Steve Cohen	Santa Clarita	CA	91350	US	11/5/2021
Betty Josselyn	Santa Clarita	CA	91350	US	11/5/2021
Michelle Merjanian	Valencia	CA	91355	US	11/5/2021
Venita Ewing	Santa Clarita	CA	91355	US	11/5/2021
Elizabeth Malinowski	Santa Clarita	CA	91390	US	11/5/2021
Cynthia Kimura	Redondo Beach	CA	90278	US	11/5/2021
Patricia Trivitt	Glendale	CA	91202	US	11/5/2021
Ruben Zamora	Valencia	CA	91354	US	11/5/2021
Kyle Harris	Canyon Country	CA	91387	US	11/5/2021
Michael Bosch	Valencia	CA	91354	US	11/5/2021
Vicki Manzanares	Stevenson Ranch	CA	91381	US	11/5/2021
Melissa Lind	Castaic	CA	91384	US	11/5/2021
Natalie Monet	Santa Clarita	CA	91350	US	11/5/2021
Tracey T.	Castaic	CA	91384	US	11/5/2021
Camille Whittaker	Santa Clarita	CA	91350	US	11/5/2021
Katarina Ford	Santa Clarita	CA	91350	US	11/5/2021
Debbie Craig	Newhall	CA	91321	US	11/5/2021
Grace Reaves	Canyon Country	CA	91387	US	11/5/2021
Sara Arrington	Santa Clarita	CA	91355	US	11/5/2021
Jessica Hall	Los Angeles	CA	90036	US	11/5/2021
Aubrey Martin	Austin	TX	78746	US	11/5/2021
Deanne Abraham	Los Angeles	CA	90057	US	11/5/2021
Cheri Weiss	Valencia	CA	91354	US	11/5/2021
Dalia Sedra	Santa Clarita	CA	91350	US	11/6/2021
Demi Bishop	Downey	CA	90241	US	11/6/2021
ariana ford	Santa Clarita	CA	91350	US	11/6/2021
Mary Jo Dragojlovic	Valencia	CA	91355	US	11/6/2021
Gloria Quijano Siade	Valencia	CA	91355	US	11/6/2021
Stephen Cravitz	Valencia	CA	91354	US	11/6/2021
Barbara Barbara	Chino valley	AZ	86323	US	11/6/2021
Lisa Matheus	Valencia	CA	91381	US	11/6/2021
Deborah Neustadt	Des Moines	IA	50312	US	11/6/2021
April Borja	Downey	CA	90241	US	11/6/2021
Rose Doe	Las Vegas	CA	91355	US	11/6/2021
Christine Gabr	Valencia	CA	91354	US	11/6/2021

Name	City	State	Postal Code	Country	Signed On
Michele Crook	Castaic	CA	91384	US	11/6/2021
Mike Collins	New Castle		19720	US	11/6/2021
angie bell	tiffin		44884	US	11/6/2021
Valerie Leet	Valencia	CA	91354	US	11/6/2021
cameron mcallister	New Port Richey		34655	US	11/6/2021
Jeannette Mercado	Saugus	CA	91350	US	11/6/2021
Shannon Mast	Sherman Oaks	CA	91403	US	11/6/2021
Abigail Parcon	Castaic	CA	91384	US	11/6/2021
Corlo Hernandez	Mccomb		39648	US	11/6/2021
Tracy Erickson	Valencia	CA	91354	US	11/6/2021
Debra Goldner	Valencia	CA	91354	US	11/6/2021
Maria Fernandez	Stevenson Ranch	CA	91381	US	11/6/2021
Kelly Callahan	Santa Clarita	CA	91381	US	11/6/2021
Robert Collier	Santa Clarita	CA	91350	US	11/6/2021
Alfonso Mercado	Chula Vista	CA	91350	US	11/6/2021
Manuel Romeral	Valencia	CA	91355	US	11/6/2021
Tracy Shin	Valencia	CA	91381	US	11/6/2021
Jin Chung	Los Angeles	CA	91381	US	11/6/2021
Eric Peoples	Stevenson Ranch	CA	91381	US	11/6/2021
Jennifer Pajarillo	Valencia	CA	91355	US	11/6/2021
Omar Sheikh	Valencia	CA	91354	US	11/6/2021
Angelo Bell	Walnut Creek		94598	US	11/6/2021
Mark Micchio	Valencia	CA	91355	US	11/6/2021
Marie Scherb	Valencia	CA	91355	US	11/6/2021
SALLY WHITE	Valencia	CA	91355	US	11/6/2021
Jean Curtis	Valencia	CA	91381	US	11/6/2021
Cameron Collier	steveson ranch	CA	91381	US	11/7/2021
Carole Lutness	Valencia	CA	91355	US	11/7/2021
Benny Kanner	Bronx		10463	US	11/7/2021
Angela Ryoo	Santa Clarita	CA	91350	US	11/7/2021
Chris Towles	Canyon Country	CA	91387	US	11/7/2021
Mike Milinkovic	Santa Clarita	CA	91350	US	11/7/2021
Sonya Acosta	Valencia	CA	91355	US	11/7/2021
Paula Rose	Rochester	MA	2770	US	11/7/2021
Lisa James	Valencia	CA	91355	US	11/7/2021
Veth Xoumphonphakdy	Murfreesboro	TN	37128	US	11/7/2021
Nagito Komaeda	Orlando		ofugjg	US	11/7/2021
Tamar Kartalian	Valencia	CA	91355	US	11/7/2021
Essam Buckly	Los Angeles	CA	90045	US	11/7/2021
Emma hall	Birmingham		35226	US	11/7/2021
Ashley M	Austin		78727	US	11/7/2021
hannah Geelan	Canyon Country	CA	91387	US	11/7/2021
Shawn Stuber	Wichita		0.67217	US	11/7/2021
Joerg Hallbauer	Canyon Country	CA	91351	US	11/7/2021
KaiLyn HoFFman	Newark		19711	US	11/7/2021
Silvia Sigman	Santa Clarita	CA	91350	US	11/7/2021
Tony Boro	Silver Spring		20904	US	11/8/2021

Name	City	State	Postal Code	Country	Signed On
Bruce Campbell	Los Angeles	CA	90034	US	11/8/2021
Tanja Brosche	Santa Clarita	CA	91350	US	11/8/2021
Daryl Shoemaker	Valencia	CA	91381	US	11/8/2021
Alex Baeza	Los Angeles	CA	91355	US	11/8/2021
Ella B	Alden	NY	14004	US	11/8/2021
Sean M Karmody	Valencia	CA	91381	US	11/8/2021
Steven Miller	Valencia	CA	91355	US	11/8/2021
Michele Karpel	Santa Clarita	CA	91350	US	11/8/2021
hiroshi suzuki	Canyon Country	CA	91387	US	11/8/2021

Name	City	State	Postal Code	Country	Date	Comment
Lynne Plambeck	Newhall	CA	91321	US	11/3/2021	"We can't stop climate change by building more urban sprawl auto oriented projects like this. Houses shouldn't be built over oil fields. They are already doing that in Mission Village. I will send my opposition and reasons to this project to Jodie Sackett re: Entrada South at subdivisions@planning.lacounty.gov - Hope everyone else will too."
Megan Manning				US	11/3/2021	"Building these houses will be detrimental to our already depleted resources like water and increase the rate of climate change. The Regional Planning department needs to protect the existing residents and implement preventative measures to ensure our health and safety. The current NOP does not comprehensively protect us and building should not start until these systems are in place."
Cher Gilmore	Canyon Country	CA	91351	US	11/4/2021	"I totally agree that we don't need any more high-priced housing developments. Entrada South will not provide housing for those who need it -- only more carbon emissions, traffic, and more demand for our already threatened water supplies."
Susann Rizzo	Valencia	CA	91355	US	11/4/2021	"Climate Crisis needs everyone to put on the brakes! No more pollution from any source. We cannot survive ongoing building/traffic/water shortages."
Elliot Bronwein	Newhall	CA	91321	US	11/4/2021	"We need to protect health and the quality of life in the Santa Clarita Valley."
Susie V Kaufman	Santa Clarita	CA	91321	US	11/4/2021	"The very THOUGHT of having homes (obviously with families and companion animals living in them) makes me sick at heart. What a horrific risk to their lives. And then there are all the other obvious reasons, such as this being a negative "contribution" towards climate change (which is already horrifyingly bad), our environment (the very air which we must breathe), and the concerns for where water is supposed to come from, when we're already in a serious water crisis. Builders don't care about there being no water, as they apparently believe it will simply magically appear. Well, it will NOT. There is none. Even the construction of such homes will require using water. It's heart-breaking. All of this -- and more -- should be included in what I believe must be a NEW Environmental Impact Report, since it's been six years since only a draft EIR (with holes in it) was reported upon. I'm so tired of new housing developments coming in to every patch of land spotted by greedy people, most of whom don't/won't even"
Dale Sahm	Santa Clarita	CA	91350	US	11/5/2021	"Building homes over oil fields? This is not new information. Lived here for 25 years. I can't imagine the horror this will bring on. We have no water, roads, or facilities. No children's hospitals. Oh my gosh. It's gridlocked already. The dump isn't far from there too! This isn't rocket science. Somebody just wants MONEY, and they will run. No no no"
Susana Rovero	Castaic	CA	91310	US	11/5/2021	"Why is the county wanting to destroy santa clarita of its beauty? Over building, and all new projects need to stop, it is already horrible, with traffic, crating more homes, only causes, more bad air quality, more traffic, and the destruction of our natural open spaces, without having it dedicated. Stop invading santa clarita, stop the buildings of new homes."
Florinda Dayao	Moreno Valley	CA	92551	US	11/5/2021	"Florinda Dayao Moreno Valley Ca 92555"
Kathi FastnowDirkse	Saugus	CA	91350	US	11/5/2021	"Opposed to housing over toxic conditions."

Name	City	State	Postal Code	Country	Date	Comment
Atiya Khan	Valencia	CA	91355	US	11/5/2021	"Air pollution due to traffic, traffic congestion and water"
Venita Ewing	Santa Clarita	CA	91355	US	11/5/2021	"#1. Water! Not enough to go around now!#2 Traffic! Roads are at gridlock. An emergency would be havoc & dangerous."
Cynthia Kimura	Redondo Beach	CA	90278	US	11/5/2021	"I am concerned that the planning of this development hasn't addressed water supply issues and environmental impact satisfactorily. Also, what is the health safety issue of placing this development close to oil wells?"
Kyle Harris	Canyon Country	CA	91387	US	11/5/2021	"Do NOT do this!Irresponsible! Too much traffic in SCV!"
Sara Arrington	Santa Clarita	CA	91355	US	11/5/2021	"1. There needs to be more checks and balances for the county and developers- they are ALL in bed together for a common goal - and NO, it's not the constituents or citizens - it's the almighty \$\$\$\$ 2. Where is this water source coming from? Aren't we in a drought?!! 3. NO solid plan for environmental impact4. Not enough communication with the community or proper time to discuss Thebes impacts."
Katarina Ford	Stevenson Ranch	CA	91381	US	11/6/2021	"#1 - The Entrada South updated EIR needs to acknowledge what happened with the water tank in Westridge and make sure there are clear measures in place so this toxic environmental disaster does not happen again in further developing FivePoint Valencia/Newhall Ranch. There are additional water tanks that are planned to be built for this development, and I want to see clearly spelled-out conditions in place for the construction of water tanks and include WHO the responsible party for the tank is, WHO the agency is that needs to be contacted with issues arising in the construction of the tank, and mitigation measures for sandblasting that will be done on the water tanks. TARPING ANY SANDBLASTING NEEDS TO BE REQUIRED, along with timely and proper collection and disposal of waste material.#2 - Air Quality issues from grading. STOP GRADING when winds pick up, and increase watering trucks. #3 - Added traffic and pollution caused #4 - Noise issues from work being done OUTSIDE OF permitted hours, which has happened o"
Valerie Leet	Valencia	CA	91354	US	11/6/2021	"Environment impact of pollution and traffic"
stacy fortner	Santa Clarita	CA	91354	US	11/6/2021	"This development is being built directly across the street from the largest operating garbage dump in the United States. This dump hauls trash in from a far away as Tijuana adjacent Chula Vista. They take trash from Disneyland another county away, and radioactive debris from the Santa Susana Field Lab. To offset their claims of "net zero carbon emmissions", the developer is sending clean stoves to Africa meanwhile choking out our own children here locally. Crooked developer bilked CalPers retirement fund of a billion dollars, but a swift bankruptcy and name change isn't fooling us. Sign this petition. Stop a crooked developer & their horrible development. https://www.latimes.com/archives/la-xpm-2009-jul-21-fi-newhall21-story.html "

Name	City	State	Postal		Comment	
			Code	Country	Date	Comment
stacy fortner	Santa Clarita	CA	91354	US	11/6/2021	"The Newhall Ranch development is being built directly across the street from the largest operating garbage dump in the United States. This dump hauls trash in from a far away as Tijuana adjacent Chula Vista. They take trash from Disneyland another county away, and radioactive debris from the Santa Susana Field Lab. To offset their claims of "net zero carbon emissions", the developer is sending clean stoves to Africa meanwhile choking out our own children here locally. Crooked developer bilked CalPers retirement fund of a billion dollars, but a swift bankruptcy and name change isn't fooling us. Sign this petition. Stop a crooked developer & their horrible development. https://www.latimes.com/archives/la-xpm-2009-jul-21-fi-newhall21-story.html "
Carole Lutness	Valencia	CA	91355	US	11/7/2021	"New housing should be based on real need and environmental preservation concerns. Rich corporate developers who pay off politicians should not determine what our growth is. Local citizens not greedy outsiders with no community connection should control growth."
Essam Buckly	Los Angeles	CA	90045	US	11/7/2021	"Our community is unique because of its limited number of homes and residents. Its environment continues to lead in clean air, less noise pollution, and low crime rate. Don't damage a good neighborhood by adding more homes, more traffic, more pollution, and more crimes."
Bruce Campbell	Los Angeles	CA	90034	US	11/8/2021	"Quit overbuilding in the watershed of the Santa Clara River, and do not count oscillating water volumes gained from perchlorate-contaminated groundwater or from unreliable import of water over hundreds of miles."

From: Randy Martin <drrandymartin@gmail.com>
Sent: Saturday, October 30, 2021 9:26 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Entrada South project
CAUTION: External Email. Proceed Responsibly.

Dear Ms. Sackett:

First, I do not understand why this is only a supplemental Environmental Impact Report in view of the substantial affects this project will have on our community. Traffic has increased immensely on the I-5, adding to the noise and air pollution. Climate change and GHG gases are not even listed as a subject to address. How can this be? Please address these issues and add me to the notification list for the Environmental Impact report.

Thank you

Dr. Randy Martin, OMD
23812 Spinnaker Court
Valencia, CA 91355

From: John Paladin <paladinesq@aol.com>

Sent: Thursday, October 28, 2021 10:24 PM

To: DRP Subdivisions <subdivisions@planning.lacounty.gov>

Subject: Opposition to Entrada South development and additions to the Commerce Center in Santa Clarita, CA.

CAUTION: External Email. Proceed Responsibly.

I am opposed to further development at this location. It is an excessive amount of development without enough environmental review by LA County. It will negatively affect traffic and the surrounding communities with too many homes and buildings in the area.

The County should have enforceable standards for environmental protections, and not just rely on environmental documents from other government agencies.

There is not an adequate water supply for this development to go forward.

There is not adequate traffic mitigation for this development to be allowed.

The space should be left open for the community.

The County is proposing to only produce a supplemental EIR to the Resource Management Plan which is a state and federal document, not a county document. How will the County enforce conditions of approval? What happened to the draft EIR that they produced in 2015 which we all commented on. Why is there no section on Climate Change? Why did the County only give two weeks notice for the Scoping meeting for this huge project? We are in the middle of a drought. Where will the water come from? These houses will be built over abandoned oil wells. Is that safe? Probably not.

John Paladin, 661 255 5000.

Box 801777, Valencia, CA 91380.

From: Edwina Roberts <edwinaproberts@gmail.com>

Sent: Thursday, October 14, 2021 5:19 PM

To: DRP Subdivisions <subdivisions@planning.lacounty.gov>; Edwina Roberts <edwinaproberts@gmail.com>

Subject: Entrada South and Valencia Commerce Center Project

CAUTION: External Email. Proceed Responsibly.

Thank you for the opportunity to submit my comments.

Edwina Roberts
26455 Rockwell Canyon Road
#263
Valencia, California 91355
Edwinaproberts@gmail.com

October 14, 2021

Mr. Jodie Sackett
Subdivisions
Department of Regional Planning
County of Los Angeles
320 W. Temple Street, Room 1362
Los Angeles, California 90012

Re: Entrada South and Valencia Commerce Center Project

Dear Mr. Sackett,

As a proud Los Angeles County resident, I take seriously the environment health of our region. That's why I'm writing in support of FivePoint Valencia, which demonstrates that a master-planned community doesn't have to leave a massive carbon footprint. This community is setting a high bar for environmental sustainability while helping California meet its severe housing demands.

In its next phase, FivePoint Valencia proposed to build approximately 1,500 new residential units, all while on a path to becoming the largest community of its kind to achieve net zero greenhouse gas emissions and zero net energy for homes and buildings. This commitment includes widespread electric vehicle infrastructure and solar panels on every home, along with high-performance attics that reduce the need for air conditioning. Even the swimming pools at Confluence Park are geothermally heated.

FivePoint Valencia balances providing housing at a time of desperate need, while doing so in an environmentally sustainable way. The Entrada South/VCC project is necessary to implement the full Valencia vision, and I hope it will be approved without delay. I hope this incredible community will be approved.

Sincerely,


Edwina Roberts

From: Nadine Romero <nadinerbeaner@gmail.com>
Sent: Thursday, November 11, 2021 1:39 AM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Entrada South Subdivision

CAUTION: External Email. Proceed Responsibly.

To whom it may concern,

I am writing to inform you of my opinion regarding the building 1500+ units in SCV. It can do a lot of damage to the existing homeowners' property and our environment, air quality, congestion, water supply, etc. I am also curious as to why there wasn't proper notice given. Two weeks notice is not enough advance notice.

Signed by a concerned resident, 20+ years, of the Santa Clarita Valley.

Nadine Romero
28045 Dickason Dr, Santa Clarita, CA 91354

From: Cristina Ropp <happybaker@theropps.com>
Sent: Thursday, October 28, 2021 10:16 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Entrada South project

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Sackett:

First, we do not understand why this is only a supplemental Environmental Impact Report in view of the substantial affects this project will have on our community. Traffic has increased immensely on the I-5, adding to the noise and air pollution. Climate change and GHG gases are not even listed as a subject to address. How can this be? Please address these issues and add me to the notification list for the Environmental Impact report.

Thank you!
Sincerely -

Cristy Ropp

From: Matthew Ropp <matthew@theropps.com>
Sent: Friday, October 29, 2021 10:05 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Entrada South project

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Sackett,

I do not understand why this is only a supplemental Environmental Impact Report in view of the substantial effects this project will have on our community. Traffic has increased immensely on the I-5, adding to the noise and air pollution. Climate change and GHG gases are not even listed as a subject to address for this project.

Please address these issues and add me to the notification list for the Environmental Impact report.

Thank you,

Matthew Ropp
25437 Via Impreso
Valencia, CA 91355
matthew@theropps.com

From: Ted D. Sirotta <sirottatd@henrymayo.com>
Sent: Monday, November 1, 2021 9:28 PM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Letter in support of FivePoint development
CAUTION: External Email. Proceed Responsibly.

Please see attached letter. Thank you.

Ted D. Sirotta
Senior Vice President, Chief Financial Officer | Administration
Henry Mayo Newhall Hospital | 23845 McBean Parkway, Valencia, CA 91355
Tel: 661.200.1025 | Fax: 661.200.1048
sirottatd@henrymayo.com
henrymayo.com

November 1, 2021

Mr. Jodie Sackett
Subdivisions
Department of Regional Planning
County of Los Angeles
320 W. Temple Street, Room 1362
Los Angeles, CA 90012

VIA E-MAIL TO subdivisions@planning.lacounty.gov

Dear Mr. Sackett:

My name is Ted Sirotta, and I am a resident of the Santa Clarita Valley.

I wanted to let you know how thrilled I am to see our region add a community that offers expansive public gathering spaces, hiking trails and more, all built cohesively from the ground up. FivePoint Valencia is delivering these features all while addressing California's severe housing shortage and raising sustainability to new heights.

The proposed next phase of this community will deliver more than 1,500 new homes in the Entrada South village and complete the Valencia Commerce Center. These new jobs, new businesses and new homes will help drive growth throughout the region for years to come.

Yours truly,

A handwritten signature in blue ink, appearing to read 'TDS', with a long horizontal flourish extending to the right.

Ted D. Sirotta

From: Arlyne Szerman <outlook_C891D08E1269A82D@outlook.com>

Sent: Friday, November 19, 2021 8:11 PM

To: DRP Subdivisions <subdivisions@planning.lacounty.gov>

Subject: Entrada South Project

CAUTION: External Email. Proceed Responsibly.

I wanted to voice my opposition to this project currently being considered. This will add even more traffic to the I5 freeway which is already a nightmare during rush hours.

We used to be a nice place to live where our kids could play outside and our cars were safe in on driveways. That is why many of us moved to Santa Clarita but now, between the crime stats and the freeway traffic, it has become another San Fernando Valley. This is all besides the water issues that will become more dire as time goes on, especially with 1500 more households.

We really MUST stop that from happening. There is no place to go if you transform our beautiful, safe City into just more urban sprawl.

Please consider the current residents of Santa Clarita when you decide on this development.

Arlyne Szerman

From: Sally White <sallywhite24@sbcglobal.net>
Sent: Tuesday, October 19, 2021 12:24 PM
To: DRP Public Comment <comment@planning.lacounty.gov>
Cc: Lynne Plambeck <lynnepl1@juno.com>
Subject: Vesting Tentative Tract Map (VTTM) No. 083582 - "Entrada South"

CAUTION: External Email. Proceed Responsibly.

Los Angeles County Department of Regional Planning
planning.lacounty.gov
Subject: Vesting Tentative Tract Map (VTTM)
No. 083582 "Entrada South"
Entrada Housing Project

The time for such a project has long since passed us by. This is no longer a development that is wise or sustainable. It is rather like going back to transportation via horse and buggy, which we might well end up doing should projects such as this add to the discomfort of such things as: climate change, the drastic reduction in the availability of an adequate supply of water, increases to an already unhealthy level of particulate matter in our community, and traffic already practically at a standstill and marred by freeway accidents on a daily basis.

The very recent Los Angeles County Climate Vulnerability Assessment indicates the residents of Santa Clarita are "living in a community deemed highly exposed to impending and severe climate impacts". Adding 1,574 more homes to this community will thusly increase the vulnerability of everyone.

Though this project was long ago approved, pure and simple intelligence indicates that when circumstances change you rethink any decision, and appropriately change course. You do NOT sail your ship, loaded with passengers, directly into a harmful storm. Surely we have the intelligence to figure this out, change course, and avoid a horrific calamity.

Sincerely,

Sally Louise White
26242 Park View Road
Valencia CA 91355

From: Sydney Byars <sydneymarie@sbcglobal.net>

Sent: Thursday, October 7, 2021 6:40 PM

To: DRP Subdivisions <subdivisions@planning.lacounty.gov>

Subject: SCH No 2000011025; Project No TBD; Entrada South VTTM 083582

CAUTION: External Email. Proceed Responsibly.

Good afternoon,

Yesterday it came to my attention a *Notice of Scoping Meeting & Notice of Draft Supplemental EIR* was placed behind my home. The Notice was posted on Live Oak Road in Castaic (91384). I was hoping I could be provided with some additional information (i.e. exact location and scope of the project) on this project so I can potentially comment further as it will likely directly impact my home.

If there is someone else I should contact, please let me know so I can do that immediately.

Kind regards,

Sydney Winzer

(661) 904-8856

sydneymarie@sbcglobal.net

Sent from [Mail](#) for Windows

From: Maran Zyhailo <mzyhailo1@yahoo.com>
Sent: Friday, November 5, 2021 4:44 AM
To: DRP Subdivisions <subdivisions@planning.lacounty.gov>
Subject: Jodi S. Entrada Entrance to Newhall Ranch

CAUTION: External Email. Proceed Responsibly.

Hi, Jodi!

I feel concerned about air quality, climate change, the Santa Clara River, water supply, and that houses may be built on top or near oil wells as well as more traffic in Santa Clarita.

Where will the water come from? Some of the houses may be built over abandoned oil wells. Is that safe?

Thank you!

Maran 661-212-8682 cell