NORTHLAKE
CASTAIC, LOS ANGELES COUNTY, CALIFORNIA

CREEK AVOIDANCE ALTERNATIVE

ASSESSMENT

July 2021
Revised: June 2022

Prepared for:

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EXHIBITS

I. INTRODUCTION/BACKGROUND

The project involves the phased development of up to 3,150 residential units, 9.2 acres of commercial uses, 13.9 acres of industrial uses, 799.5 acres of parks and open space, a 22.9-acre school site and a 1.4-acre pad for a future fire station (Project) within the area of the previously approved Northlake Specific Plan (Project Site). Subsequent to the publication of the Final SEIR, the Regional Planning Commission requested that the Applicant include an affordable housing component in the Project. The Applicant made minor revisions to the Project to include an affordable component. Specifically, the Applicant eliminated 108,283 square feet (SF) of industrial use (all of the industrial uses) and 13,197 SF of commercial uses (leaving 38,700 SF of commercial uses) and reallocated 323 units from the Phase 2 area of the Project to the Phase 1 area. The County of Los Angeles Regional Planning Commission approved the Northlake Project on April 18, 2018 and the Los Angeles County Board of Supervisors approved the Project on April 2, 2019 (previously Approved Project).

On January 11, 2021 the Los Angeles Superior Court ruled (Court Ruling) on the Center For Biological Diversity and Endangered Habitats League v. County Of Los Angeles, et al, and Real Parties in Interest, Northlake Associates, et al, Case No. 19STCPO1610, finding that the analysis of project alternatives in the Supplemental Environmental Impact Report (SEIR) was deficient in failing to adequately study a creek avoidance alternative and explain the reasons for rejection at a screening level. The ruling on the creek avoidance alternative is as follows.

ISSUE TWO: THE REASONABLE RANGE OF ALTERNATIVES PRESENTED IN THE SEIR IS DEFICIENT FOR FAILING TO CONSIDER AN ALTERNATIVE THAT WOULD PRESERVE THE GRASSHOPPER CREEK HABITAT:

CEQA requires the lead agency to consider a reasonable range of alternatives to evaluate whether an alternative to the Project exists that will reduce or better mitigate the significant environmental impacts of a project. PRC 21002; Guidelines section l 5126.6. An EIR is to "ensure that all reasonable alternatives to proposed projects are thoroughly assessed" by the decision- makers. Laurel Heights Improvement Association v. Regents of the University of California (1988) 47 Cal.3d 376, 400.

The SEIR's alternate analysis for the Project does not include an alternative that would protect Grasshopper Creek (AR 2403-2426), and for that reason is fatally flawed.

Without necessarily finding a violation of section 1 51 51, the Court finds that the County's exclusion of the "creek avoidance" alternative from the range of alternatives is not supported by substantial evidence. That failure is a violation of Guidelines section 1 5126.6 and, therefore, of PRC 21002. The failure invalidates the approvals given for the Project and requires the submittal of an amended EIR that includes an appropriate analysis section for consideration by the County's decisionmakers.

The planning and design effort of this Creek Avoidance Alternative Assessment is to address the Court Ruling that includes an updated alternative study and a comprehensive analysis of the impacts and feasibility off a Creek Avoidance Alternative.

II. CREEK AVOIDANCE ALTERNATIVE DESCRIPTION

This Creek Avoidance Alternative assumes the same design basis as the previously assessed screening alternative in the SEIR: avoid disturbing the creek bottom that runs through the Project Site while developing a viable land plan effectuating the approved Northlake Specific Plan. The existing landform is created by landslides that traverse the Project Site from the westerly side of Grasshopper Creek to the easterly side of the Project boundary. Typically, per standard engineering and design practices and Los Angeles County requirements, all underlying landslides would be required to be removed and recompacted in order to provide a suitable soil condition for project development. Grasshopper Creek has several existing landslides directly underneath the creek bottom that extend from approximately 10-feet to 200-feet easterly and westerly of the creek bottom. A 300-foot setback was determined to be an appropriate buffer from the creek bottom for the Creek Avoidance Alternative. This setback was based on three considerations: 1) Topography ascending to the east from the creek can be rather steep (locally 1.5:1 to 1:1 +/-). The 300-foot setback generally removes the toe of development into areas with 3:1 to 4:1 slope gradients. 2) The irregular / meandering path of the creek bed required a suitable setback to accommodate a design that would allow a toe for a fill slope configuration, as development is proposed for the easterly slopes and developable pads will need to be graded. 3) The 300-foot setback allowed the proposed fill slope to begin further east / upslope of the upper portions of most of the small to moderate size landslides which are located along the east side of the creek bed. This design and the suitability of the landslide stability mid slope would still need to be fully analyzed by G3SoilsWorks (the Project Site geotechnical engineer for the Project). Thus, the developable area for the Creek Avoidance Alternative will commence at the creek setback line and ascend easterly to the easterly boundary of the Creek Avoidance Alternative. The Creek Avoidance Alternative requires the realignment and new construction of Ridge Route Road. The planning areas around the realigned Ridge Route Road will be developed to provide affordable housing and commercial uses. The Creek Avoidance Alternative is shown on the Creek Avoidance Study Exhibit "A" (attached hereto).

III. ALTERNATIVE ANALYSIS

A. Limits of Grading & Earthwork

Under this alternative, from the easterly creek setback a 2:1 ascending slope would create tiers of developable pad areas across the Project Site to the easterly Project boundary. The total residential developable area will be limited to 264 acres when various factors discussed below are taken into account (the total Project Site acreage is 1330 acres). The elevation for the developable pads for this alternative is based on the approved Northlake Specific Plan elevations. The Creek Avoidance Alternative site grading will require cut in order to develop the site as indicated, however, due to the lack of fill placement area this new design will produce a net export of dirt, which will need to be exported offsite from the Project Site: Phase 1 will produce an estimated 5.4 million cubic yards of export, and Phase 2 will produce an estimated 2.8 million

cubic yards of export, totaling approximately 8.2 million cubic yards of export from the Project Site. The exported yardage would need to be taken offsite to a landfill or other designated area by haul trucks. In comparison, the Approved Project resulted in a balanced site; no export was required.

B. **Project Access - Bridges**

As part of the design for the Creek Avoidance Alternative, two clear span bridges to access the project from Ridge Route Road are required in Phase 1, and an additional third bridge is required in Phase 2. The bridges will be approximately 600-feet long to span across Grasshopper Creek, west to east, and will be approximately 90- to 120-feet above the creek bottom. Columns and piles will be required to be imbedded into underlying, intact bedrock at either end of the bridge. The utilities (i.e., sewer, water, gas, electric, telephone and cable) serving the easterly portion of the project will be supported and span under these bridges all crossing the creek from above similar to access, utilities run west to east given existing conditions.

Hydrology & LID

Los Angeles County Public Works approved the hydrology study for Tentative Tract 73336 based on the previously Approved Project configuration. The previously Approved Project was designed assuming existing Grasshopper Creek would be graded and filled with the tributary drainage areas being captured and routed through the Project Site in a covered storm drain system. At the downstream end of the Project was a series of regional basins (retention and detention) that were designed to mitigate increases to storm drain runoff volume due to site development and to satisfy hydromodification requirements (Projects must fully mitigate off-site drainage impacts caused by hydromodification and changes in water quality, flow velocity, flow volume, and depth/width of flow. Hydromodification control criteria must be implemented by project applicants to control potential adverse impacts of changes in hydrology that may result from projects located within natural drainage systems; County of Los Angeles Department of Public Works, Low Impact Development, Standard Manual, February 2014). Since these basins are located within the footprint of the existing creek, they would not be able to be utilized for the Creek Avoidance Alternative. Per the geotechnical consultant, G3SoilsWorks, the only place where infiltration would be feasible on the Project Site was within the creek bottom area. Therefore, for hydromodification and Low Impact Development (LID) purposes, the use of infiltration for the Creek Avoidance Alternative would be considered infeasible. Similarly, there would not be enough irrigation demand to implement a harvest and re-use program. Biofiltration would therefore be required to meet the LID volume criteria.

The Creek Avoidance Alternative would reduce the hydromodification impacts as compared to the previously Approved Project. This is due to the fact that there would be debris in the creek which would reduce the effects of "hungry water" as the Creek Avoidance Alternative outlets the developed "Q" into the existing drainage course. However, there would still be some degree of impact and in order to mitigate for this hydromodification concern, the Creek Avoidance Alternative would require that drainage acceptance letters for any hydraulic impacts be obtained from all downstream owners.

The previously Approved Project had a 1,001 acre disturbed area project footprint with a requirement of 41.3 acre-ft of retention storage for LID and 113.6 acre-ft of detention storage for hydromodification. The Creek Avoidance Alternative has a 647 acre disturbed area project footprint. For the Creek Avoidance Alternative, we have prorated these volumes based on the project footprint (647 acre for Creek Avoidance/1,001 acre for the previously Approved Project = 0.646). Therefore, the required storage for the Creek Avoidance Alternative is 43.1 x 0.646 = 27.9 acre-ft of retention and 113.6 x 0.646 = 73.4 acre-ft for detention storage. The 27.9 acre-ft could no longer be retained and infiltrated and would therefore need to be accepted by the downstream owner. Since the site drains to the Castaic Lagoon an increase in volume may be considered by the owner (State and County) to be beneficial.

C. Unit Count

With a significantly reduced project footprint, revised street design to accommodate traffic circulation, LID requirements, and relocated basins/best management practices (BMPs), the developable acreage for the Creek Avoidance Alternative decreases the total developable area from 364 acres to 286 acres, thereby reducing the amount of area available for development. After incorporating other conditioned site elements such as a 23 acres school site and 1 acre fire station (as per the Specific Plan) along with 167 acres of recreation and park areas, under the Creek Avoidance Alternative design the residential unit count will be reduced to 1,815 units (of which 165 units are affordable). As compared to the 3,150 dwelling units (of which 315 units were affordable with an additional 6 live/work units) under the previously Approved Project, the Creek Avoidance Alternative would result in a reduction of 1,335 dwelling units. The Creek Avoidance Alternative will have similar commercial acreages as the previously Approved Project. Proportionately, the affordable unit count would be reduced from 315 to 165 units.

IV. CONCLUSION

The previously Approved Project was a balanced site as it relates to grading and earthwork. The Creek Avoidance Alternative requires extensive cut in order to create the developable pad areas. Due to the lack of onsite fill areas to accept this cut the Creek Avoidance Alternative is an unbalanced site which produces 8.2 million cubic yards of export, which will need to be hauled offsite.

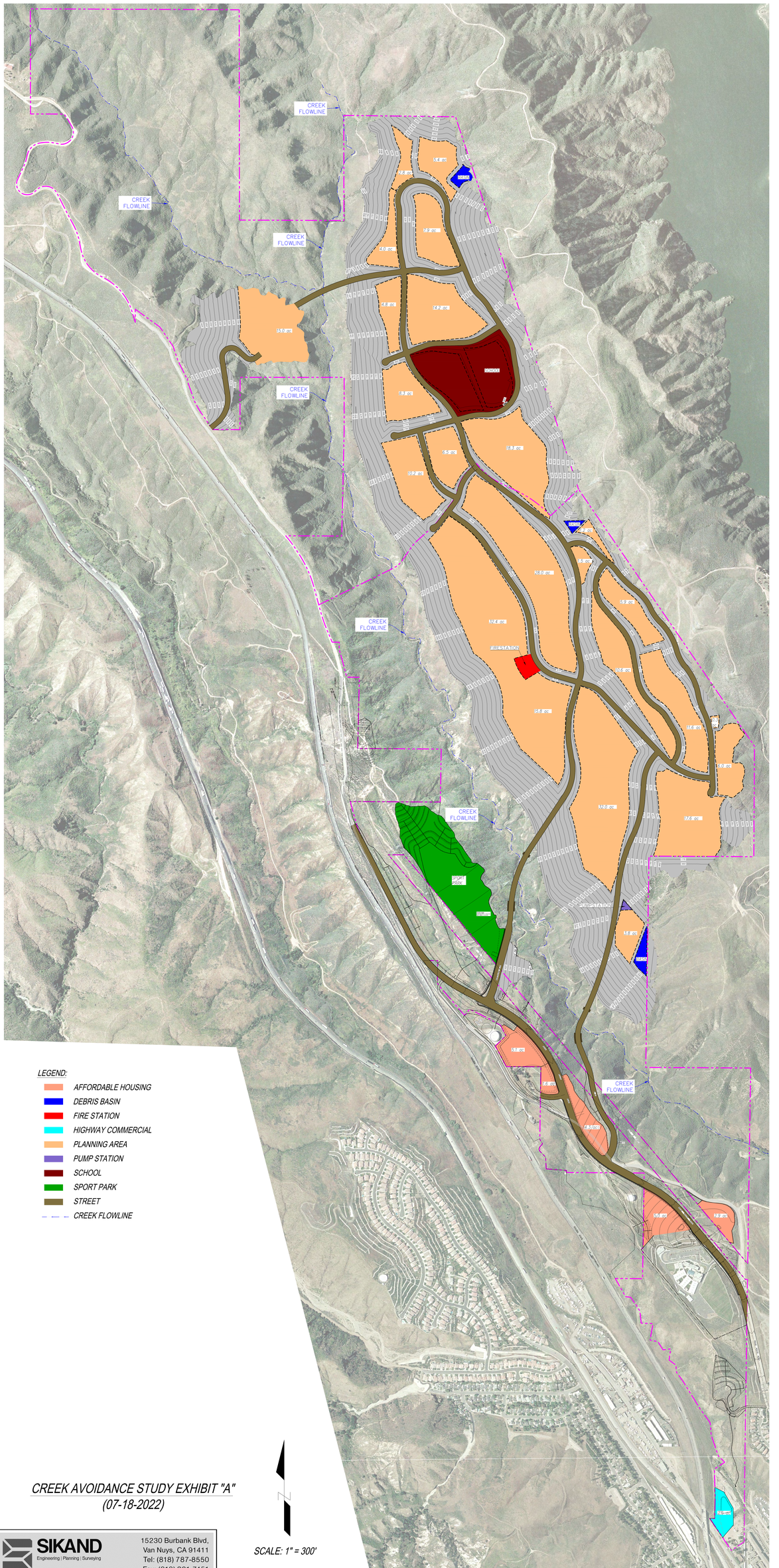
The required infrastructure improvements, remediation of potential geotechnical and flood hazards and project grading that requires relocations of some existing on-site easements, pipelines, and utilities to accommodate site development are similar to the original design, and in some cases more (due to the crossing and support within or below the three proposed bridges crossings) than were in the previously Approved Project.

The previously Approved Project took advantage of the permeable areas in the creek at the downstream end of the project to meet LID and hydromodification requirements for development

of retention and detention basins. For the Creek Avoidance Alternative these requirements will need to be addressed by implementing bio-filtration and obtaining downstream acceptance letters.

Compared to the previously Approved Project, a Creek Avoidance Alternative reduces the project's developable area by 30%. This reduced developable area results in a project wide unit count reduction of 42%, or loss of 1,335 units.

This assessment assumes that from civil engineering standpoint what development could be designed to avoid Grasshopper Creek with reasonable engineering assumptions. Geotechnical and Biological evaluations are beyond the scope of this analysis and will be separately contained in the project's soils engineer, G3SoilsWorks, technical report and Glenn Lukos Associates, technical memorandum.



LEGEND:

- *AFFORDABLE HOUSING*
- *DEBRIS BASIN*
- *FIRE STATION*
- *HIGHWAY COMMERCIAL*
- *PLANNING AREA*
- *PUMP STATION*
- *SCHOOL*
- *SPORT PARK*
- *STREET*
- *CREEK FLOWLINE*

CREEK AVOIDANCE STUDY EXHIBIT "A"
(07-18-2022)

SCALE: 1" = 300'

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