Final Environmental Impact Report

Wiley Canyon Project

State Clearinghouse No. 2022030626

SEPTEMBER 2025

Prepared for:

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1 Introduction

1.1 Purpose

This Final Environmental Impact Report (EIR) has been prepared by the City of Santa Clarita (City) for the Wiley Canyon project (proposed project). This Final EIR has been prepared in conformance with the California Environmental Quality Act of 1970 (CEQA) statutes (Cal. Pub. Res. Code, Section 21000 et. seq., as amended) and implementing guidelines (Cal. Code Regs., Title 14, Section 15000 et. seq.).

Before approving a project, CEQA requires the lead agency to prepare and certify a Final EIR. The City has the principal responsibility for approval of the proposed project and is therefore considered the lead agency under CEQA Section 21067. According to the CEQA Guidelines Section 15132, the Final EIR shall consist of:

- The Draft EIR or a revision of the Draft EIR
- Comments and recommendations received on the Draft EIR either verbatim or in summary
- A list of persons, organizations, and public agencies commenting on the Draft EIR
- The responses of the lead agency to significant environmental points raised in the review and consultation process; and
- Any other information added by the lead agency

1.2 Format of the Final EIR

This Final EIR consists of the March 2024 Draft EIR and the following four chapters:

1 **Introduction.** This chapter summarizes the contents of the Final EIR and the environmental review process.

2 **Response to Comments.** During the 45-day public review period for the Draft EIR, sixty comment letters were received. This chapter contains these comment letters, which have been bracketed to organize the responses, and the City's responses to the comments.

3 **Changes to the Draft EIR.** Comments that are addressed in Chapter 2 may have resulted in minor revisions to the information contained in the March 2024 Draft EIR. Where necessary, deletions to the text are shown in ~~strikeout~~ and additions to the text are shown in **bold underline** in all applicable sections of the Draft EIR. Additionally, through the certification of this Final EIR, where the term "Draft EIR" is used in the text, this is now deemed to be "Final EIR."

4 **Mitigation Monitoring and Reporting Program.** This chapter of the Final EIR provides the mitigation monitoring and reporting program (MMRP) for the proposed project. The MMRP is presented in table format and identifies mitigation measures for the proposed project, the implementation period for each measure, the implementing party, and the enforcing agency. The MMRP also provides a section for recordation of mitigation reporting.

1.3 Environmental Review Process

1.3.1 Notice of Preparation

CEQA requires preparation of an EIR when there is substantial evidence supporting a fair argument that a proposed project may have a significant effect on the environment. The purpose of an EIR is to provide decision makers, public agencies, and the general public with an objective and informational document that fully discloses the environmental effects of the proposed project. The EIR process is intended to facilitate the objective evaluation of potentially significant direct, indirect, and cumulative impacts of the proposed project, and to identify feasible mitigation measures and alternatives that would reduce or avoid the proposed project's significant effects. In addition, CEQA requires that an EIR identify adverse impacts determined to be significant after mitigation.

In accordance with the CEQA Guidelines, a Notice of Preparation (NOP) was circulated for a 30-day public review starting on March 24, 2022, to public agencies, organizations, and interested individuals. The purpose of the NOP was to provide notification that the City plans to prepare an EIR and to solicit input on the scope and content of the EIR. Additionally, a notice announcing the availability of the NOP was also published in The Signal. Copies of the NOP were made available for electronic download on the City's website. Comments on the NOP were received from seven agencies, two organizations/utilities, and 37 letters/emails from individuals, which are provided in Appendix A-4 to the Draft EIR.

A scoping meeting was held on April 14, 2022 at Santa Clarita City Hall in the Century Conference Room. At the conclusion of the scoping meeting presentation, the City hosted a questions and answers session where attendees were able to provide comments and ask clarifying questions about the project to the City. The City also distributed comments cards, where attendees provided written comments, which are provided in Appendix A-4 to the Draft EIR.

1.3.2 Noticing and Availability of the Draft EIR

The Draft EIR was made available for public review and comment pursuant to CEQA Guidelines Section 15087. The 45-day public review period for the Draft EIR started on March 1, 2024 and ended on April 15, 2024. At the beginning of the public review period, an electronic copy of the Draft EIR and an electronic copy of the Notice of Completion (NOC) and Notice of Availability (NOA) were submitted to the State Clearinghouse. Relevant State agencies received electronic copies of the documents. The NOA was distributed to interested parties and filed with the Los Angeles County Clerk as well as published in The Signal. The NOA described where the document was available and how to submit comments on the Draft EIR. A hardcopy of the Draft EIR was available at the City Clerk's Office and at the Old Town Newhall Library. Additionally, the NOA and the Draft EIR were available to be viewed on the City website.

The Planning Commission held a public meeting on March 19, 2024, during the 45-day review period for the Draft EIR. Comments raised by members of the public and Planning Commissioners during the Planning Commission meeting focused on the following major topics and themes:

- Concerns about evacuation timelines during wildfires
- Concerns about the loss of oak trees, including Heritage oaks
- Excitement about improvements along Wiley Canyon Road due to currently unsafe conditions
- Concerns about increases in traffic on Wiley Canyon Road
- Concerns about the project not having a secondary access point

- Concerns about the number of spacing between roundabouts on Wiley Canyon Road
- Wiley Canyon roadway improvements and the project site plan are inconsistent with the General Plan, which calls for the widening of Wiley Canyon Road
- Visual changes to the project site
- Development within an existing wildlife corridor
- Inadequate parking and concerns that overflow parking will occur in adjacent neighborhoods
- Construction and grading concerns
- Not enough hospital space for Santa Clarita area in general, and adding more residents would increase demand
- Construction and operational noise concerns
- Requests for Class I bike lanes and pedestrian improvements along the River and along Wiley Canyon Road
- Geologic conditions of the project site
- Evacuation of seniors in the memory care and assisted living component of the project
- Ensure park has play equipment for kids and a dog park component
- Proximity of residences to Interstate 5 freeway
- Pedestrian crossings along Wiley Canyon Road, and how will those work at roundabouts

The 45-day public review period provided interested public agencies, groups, and individuals the opportunity to comment on the contents of the Draft EIR. Comment letters were received from agencies, organizations, and individuals, which are included in Chapter 2, Responses to Comments, of this Final EIR.

1.3.3 Final EIR

The Final EIR addresses the comments received during the public review period and includes minor changes to the text of the Draft EIR in accordance with comments that necessitated revisions. This Final EIR will be presented to City decision-makers for potential certification as the environmental document for the proposed project. All agencies who commented on the Draft EIR will be provided with a copy of the Final EIR, pursuant to CEQA Guidelines Section 15088(b). The Final EIR will also be posted on the City's website.

Pursuant to CEQA Guidelines Section 15091, the City must make findings for each of the significant effects identified in this EIR and support the findings with substantial evidence in the record. After considering the Final EIR in conjunction with making findings under CEQA Guidelines Section 15091, the lead agency may decide whether or how to approve or carry out the project. When a lead agency approves a project that will result in the occurrence of significant effects that are identified in the Final EIR but are not avoided or substantially lessened, the agency is required by CEQA to state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record.

1.4 Revisions to the Draft EIR

The comments received during the public review period for the Draft EIR resulted in minor clarifications and modifications in the text of the March 2024 Draft EIR, as shown in Chapter 3, Changes to the Draft EIR. These changes are included as part of the Final EIR, to be presented to City decision makers for review and consideration of certification and project approval.

CEQA Guidelines Section 15088.5 identifies when a lead agency must recirculate an EIR. A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR but before certification of the Final EIR. Information includes changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not considered significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. As defined in CEQA Guidelines Section 15088.5(a), significant new information requiring recirculation includes the following:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The minor clarifications, modifications, and editorial corrections that were made to the Draft EIR are shown in Chapter 3, Changes to the Draft EIR, of this Final EIR. None of the revisions that have been made to the Draft EIR resulted in new significant impacts; none of the revisions resulted in a substantial increase in the severity of an environmental impact identified in the Draft EIR; and, none of the revisions brought forth a feasible project alternative or mitigation measure that is considerably different from those set forth in the Draft EIR. Furthermore, the revisions do not cause the Draft EIR to be flawed such that it precludes meaningful public review. As none of the CEQA criteria for recirculation have been met, recirculation of the EIR is not warranted. As stated in CEQA Guidelines Section 15088.5(b), "recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR."

2 Responses to Comments

2.1 Introduction

A draft version of the Environmental Impact Report (Draft EIR) for the Wiley Canyon project (project) was circulated for a 45-day public review from March 1, 2024, to April 15, 2024. This chapter of the Final EIR includes a copy of each comment letter provided during the 45-day public review period for the Draft EIR. The City of Santa Clarita (City) has prepared responses to each comment, which are included in this chapter. The comments are ordered numerically, and the individual issues within each comment letter are bracketed and numbered. The City's responses to comments on the Draft EIR represent a good-faith, reasoned effort to address the environmental issues identified by the comments. Under the CEQA Guidelines, the Lead Agency is required to evaluate and provide written responses to comments received on the Draft EIR (CEQA Guidelines Section 15088).

As shown in Table 2-1, the City received 60 comment letters, including 10 agency letters and four organization letters. In accordance with the requirements of CEQA Guidelines Section 15088(b), the City will provide a written response on comments submitted by public agencies to each respective public agency at least 10 days before certifying the Final EIR.

Table 2.1. List of Commenters

Comment Letter	Name	Type	Date
Agencies			
A1	State Water Resources Control Board	State Agency	March 27, 2024
A2	Department of Toxic Substances Control	State Agency	April 11, 2024
A3	California Department of Fish and Wildlife	State Agency	April 12, 2024
A4	California Department of Transportation	State Agency	April 15, 2024
A5	Local Agency Formation Commission	Local Agency	February 29, 2024
A6	Los Angeles County Sanitation Districts	Local Agency	April 2, 2024
A7	Santa Monica Mountains Conservancy	Local Agency	April 12, 2024
A8	Los Angeles County Sheriff's Department	Local Agency	April 15, 2024
A9	Los Angeles County Sheriff's Department	Local Agency	April 18, 2024
A10	Los Angeles County Fire Department	Local Agency	April 15, 2024
Organizations			
O1	Sierra Club	Organization	March 17, 2024
O2	Western States Regional Council of Carpenters	Organization	March 18, 2024
O3	Western States Regional Council of Carpenters	Organization	April 15, 2024
O4	Santa Clarita Organization for Planning and the Environment (SCOPE)	Organization	April 15, 2024
Individuals			
I1	Julie Krumrine	Individual	March 4, 2024
I2	Annette Lucas	Individual	March 24, 2024
I3	Stephanie Correnti, RD	Individual	April 1, 2024
I4	Lindi Busenbark	Individual	April 1, 2024
I5	Annette Lucas	Individual	April 2, 2024
I6	Judith Cantor	Individual	April 3, 2024
I7	Debra Poitevint, RN	Individual	April 3, 2024
I8	Julie Miller	Individual	April 5, 2024
I9	Stephanie Correnti, RD	Individual	April 6, 2024
I10	Stephanie Correnti, RD	Individual	April 6, 2024
I11	Carla Cervantes	Individual	April 8, 2024
I12	Annette Lucas	Individual	April 8, 2024
I13	Pam Jenner	Individual	April 9, 2024
I14	Annette Lucas	Individual	April 10, 2024
I15	Judd Figatner	Individual	April 10, 2024
I16	Julie and Jeff Ford	Individual	April 10, 2024
I17	Linda Bateman	Individual	April 11, 2024
I18	Debbie Karloff	Individual	April 11, 2024
I19	TimBen Boydston	Individual	April 12, 2024
I20	Craig Nagasugi	Individual	April 12, 2024
I21	Deborah Karloff	Individual	April 12, 2024
I22	Ed Bersntein	Individual	April 13, 2024

I23	Shelley Hebdon	Individual	April 13, 2024
I24	Pamela Tognetti	Individual	April 13, 2024
I25	Loraine Cuomo	Individual	April 14, 2024
I26	Annette Lucas	Individual	April 14, 2024
I27	Annette Lucas	Individual	April 14, 2024
I28	Robert McSweeney	Individual	April 14, 2024
I29	Pamela Tognetti	Individual	April 14, 2024
I30	Julie and Jeff Ford	Individual	April 15, 2024
I31	Maggie Cockerell	Individual	April 15, 2024
I32	Stephanie Correnti	Individual	April 15, 2024
I33	Linda Heberer	Individual	April 15, 2024
I34	Sheryl Lucas	Individual	April 15, 2024
I35	Annette Lucas	Individual	April 15, 2024
I36	Michele Moline	Individual	April 15, 2024
I37	Kevin McDonald	Individual	April 15, 2024
I38	Mulberry Park Residents	Individual	April 15, 2024
I39	Brenda Miranda	Individual	April 17, 2024
I40	R. Weston Monroe	Individual	April 22, 2024
I41	Annette Lucas	Individual	April 22, 2024
I42	R. Weston Monroe	Individual	March 26, 2024
I43	Jane Stucker	Individual	April 4, 2024
I44	Dianne and Donald Hellrigel	Individual	April 10, 2024
I45	Michele Moline	Individual	April 15, 2024
I46	R. Weston Monroe	Individual	April 15, 2024

The changes to the analysis contained in the Draft EIR represent only minor clarifications/ amplifications and do not constitute significant new information. In accordance with CEQA Guidelines Section 15088.5, recirculation of the Draft EIR is not required.

2.2 Topical Responses

Topical Response No. 1 – Parking Plan

In response to comments raised by the Planning Commission regarding the adequacy of the parking provided, the applicant has revised the site plan to accommodate 50 additional parking spaces for a total of 1,016 parking spaces provided. In order to provide additional parking, the design of the landscape berm along the west property line, adjacent to the Caltrans right of way was modified. Due to the impending construction of the 18-foot-tall Metro sound wall, slated to be completed in 2026, the applicant has removed the proposed berm along the westerly property line of Planning Area 3 (the berm is proposed to remain along Planning Area 1). Elimination of the berm allows for additional parking stalls at the southwest portion of the project site. A section detail is provided below showing the landscape buffer of approximately 23 feet between the parking and the Caltrans right-of-way. There is an existing chain-link fence along the property line, which the applicant is proposing to replace with a new wrought iron fence. There is an additional 23 feet of Caltrans right-of-way before the new 18-foot-tall Metro sound wall for a total of over 40 feet between the Metro wall and the parking area.

The Mixed Use Development Standards of the Santa Clarita Municipal Code (SCMC) require that the project provide a total of 943 parking spaces. The project proposal originally included 966 parking spaces, which resulted in 23 parking spaces above the SCMC requirement. A parking demand study was also prepared for the project and concluded that the parking supply of 966 parking spaces was adequate to accommodate all uses on the project site, with the peak parking demand calculated to be 734 spaces.

Table 2.2. Parking Spaces per Land Use

Land Use	Parking Ratio	Units	Required Spaces	Proposed Spaces
Multi-family 2+ Bedrooms	2 covered/Unit	203 units	406	406
Multi-family Studio/1 Bedroom	1 covered/Unit	176 units	176	196
Multi-family - Guest	0.5/Unit	379 units	190	194
Independent Senior	0.5/Unit	130 units	65	65
Independent Senior - Guest	0.125/Unit	130 units	17	17
Residential Care Facility	0.5/Bed or Unit	87 units	44	44
Commercial	1/200 SF	8,914 SF	45	45
Unassigned	N/A	N/A	0	49
TOTAL			**943**	**1,016**

Source: City of Santa Clarita Planning Commission Agenda Packet June 18, 2024

With the proposed revisions to the site plan, the project would provide a total of 1,016 parking spaces, which includes 73 parking spaces more than required by the Santa Clarita Municipal Code. The applicant proposed to designate 24 of the surplus parking to the multi-family units (49 surplus parking would remain unassigned). As proposed, the revised site plan would provide 602 covered (garage and carport) parking spaces designated for residential units and 194 surface parking spaces for residential guests. In total, 796 parking spaces would be allocated for the multi-family units.

In total, 796 parking spaces would be allocated for the multi-family units resulting in a ratio of 2.1 spaces per unit. The project proposal provides the number of parking spaces required by the Santa Clarita Municipal Code for the

Senior Living Facility and the commercial component of the project. There are 49 surplus parking spaces that would remain unassigned, which could be utilized for all users of the project, commercial and guests alike.

The Planning Commission requested information regarding the parking requirements for multi-family projects in the City that were approved under jurisdiction of Los Angeles County. There is not a direct comparison of parking ratios applied to multi-family development under LA County code and parking ratios for mixed-use developments under the Santa Clarita Municipal Code. However, there is a distinct difference between LA County and City parking requirements for residential guest parking. LA County requires ¼ space per unit for residential guests, where the City's Santa Clarita Municipal Code requires ½ space per unit for residential guests in a mixed-use development.

Some specific multi-family developments located along Newhall Avenue and Sierra Highway that were approved by LA County include the Valle del Oro apartments on the north side of Newhall Avenue and the Park Sierra Apartments and River Circle Apartments off of Jakes Way. The overall parking ratios provided at these developments range from 1.1 to 2.3 spaces per unit, inclusive of resident and guest parking.

The Planning Commission also requested additional information on the location of ADA parking stalls around the Senior Living Facility. The number of required ADA parking stalls is regulated by the California Building Standards Code. In this case, Planning Area 1 has identified 12 ADA parking stalls, or just over 5% of the parking stalls in Planning Area 1 in conformance with the building code requirements. Four of those stalls are proposed to be located at the main entrance to the Senior Living Facility. The balance is proposed to be located in pairs around the building at entrance points to the commercial space and secondary entrances to the Senior Living Facility. The final location of ADA parking stalls will be verified during the building permit plan check process, subject to the California Building Standards Code. Additionally, the Senior Living Facility has been designed with a covered entrance to allow for drop off and pick up of residents.

Topical Response No. 2 – Residential Amenities

In response to inquiries from the Planning Commission regarding amenities for children and pets, the applicant has submitted a revised landscape concept for consideration. The updated landscape concept includes a children's play area with playground equipment and bench seating. In addition, a dog park has been incorporated and several pet waste stations have been identified throughout the project site.

Topical Response No. 3 – Traffic and Circulation

Wiley Canyon Road is currently two-lanes along the project frontage to Calgrove Boulevard and there are no signalized intersections along this stretch of roadway. As discussed at the March 19th meeting, roadway improvements associated with the project include the installation of three new roundabout intersections 1) at the project entrance on Wiley Canyon Road; 2) at Canerwell and Wiley Canyon Road; and 3) at Calgrove Boulevard and Wiley Canyon Road. In addition, a Class I trail (two-lane bicycle path and separated, five-foot wide pedestrian path) would be installed along the project frontage on Wiley Canyon Road from the project entrance to Calgrove Boulevard.

Although Wiley Canyon Road is designated by the General Plan as a Secondary Highway, which is a four-lane road configuration, along the project frontage, the proposed project improvements would maintain a two-lane roadway configuration. Based on the project Traffic Assessment, the proposed project would generate approximately 3,500

daily trips. The General Plan had assumed a build out of the project site that would generate approximately 27,000 daily trips, which resulted in designation of Wiley Canyon Road as a four-lane roadway in the General Plan.

Vehicle miles traveled (VMT) is the metric to evaluate the significance of transportation impacts. VMT based impact criterion replaced the vehicular delay or capacity-based criteria to disclose a project's impact in a manner consistent with current California law and policies. The State goals and policies incorporate environmental effects based on achieving reducing greenhouse gas (GHG) emissions, encouraging infill development, and improving public health through active transportation. The comprehensive list of City's goals and objectives in the Transportation Analysis Updates in Santa Clarita (May 2020), which are outlined and considered within the environmental analysis in Section 4.16, Transportation, show that the overall goals of implementing Senate Bill (SB) 743, through limiting VMT growth – are well aligned with the City's General Plan. While the General Plan may include build out assumptions for certain roadways, projects that increase in roadway capacity or propose roadway expansion need to consider potential impacts from inducing more travel and therefore increasing VMT.

As discussed at the March 19th meeting, the traffic volumes, inclusive of the current and expected future traffic volumes, plus the traffic volumes for the project, along this portion of Wiley Canyon Road and Calgrove Boulevard would be between 9,000 and 10,000 vehicle trips per day. This is well below the maximum capacity of a two-lane roadway, which has a maximum capacity of 16,000 to 18,000 vehicle trips per day. Due to the significantly lower daily trips generated by the proposed project (3,500) than is contemplated by the General Plan (27,000) for this site, a nexus cannot be established between the project and build out of a four-lane roadway. Based on the projected future traffic volumes, including the project trips, it is not anticipated that this portion of Wiley Canyon Road will reach the need to be four-lanes because these anticipated volumes fall well within the maximum capacity of a two-lane roadway. As part of the proposed project, dedication and acquisition of right-of-way will be necessary to accommodate the street improvements identified in the Traffic Study. Nevertheless, the Traffic and Transportation Planning Division reviewed the proposed right- of-way width of Wiley Canyon Road and determined that, in the unlikely event four-lanes ever became necessary in the future, Wiley Canyon Road could be designed to accommodate four lanes along with sidewalks on both sides, even at its narrowest section measuring 53 feet.

As it relates to vehicle access to the site, there is one access point to the project along Wiley Canyon Road. A secondary access is not required from a traffic circulation perspective. The Fire Department does require a secondary access for emergency service only, which is provided to Hawbryn Avenue. The Hawkbryn Avenue access will be gated with a Fire Department knox box or similar device. This gate will not provide pedestrian access or any non-emergency vehicle access. As a result, there is little expectation that parking associated with the project would occur on Hawkbryn Avenue because there is no direct pedestrian access at this location.

2.3 Written Comments

This section presents all comments received on the Draft EIR and responses to all comments received.

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Response to Comment Letter A1

State Water Resources Control Board
Adrian Dela Calzada, Environmental Scientist
March 27, 2024

A1-1 The comment states the project would require a water system permit amendment from the Santa Clarita Valley Water Agency. This comment is understood, and the applicant would be required to acquire the appropriate permits from the Santa Clarity Valley Water Agency.

A1-2 The comment notes the project would require the construction of a new 1.5-million-gallon storage tank. As such, the commenter requests the State Water Resources Control Board, Division of Drinking Water (referring to as the State Water Board, DDW) to be listed in the EIR's required approvals for the approval of a domestic water supply permit amendment. Given this requirement, the revision has been made to the EIR.

A1-3 The comment states design drawings and specifications for the storage tank must be submitted to the State Water Board, DDW's Angeles District before construction, pursuant to Design and Construction, California Code of Regulations section 64585(b). The Applicant would be required to prepare and submit to the City for approval, construction plans for the project.

A1-4 The comment requests items to be submitted to the State Water Board, DDW, for review in support of the aforementioned permit application. In the event the project is approved, the City will provide the Final EIR, Mitigation Monitoring and Reporting Program (MMRP), resolution certifying the Final EIR, copy of the Notice of Determination filed with the Los Angeles County Clerk and the Governor's Office of Planning and Research State Clearinghouse.

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Response to Comment Letter A2

Department of Toxic Substances Control
Dave Kereazis, Associate Environmental Planner
April 11, 2024

A2-1 This comment is introductory in nature and serves as a transmittal for the DTSC comment letter. The comment does not raise any questions, comments or concerns about the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

A2-2 This comment summarizes the proposed project. The comment does not raise any questions, comments or concerns about the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

A2-3 This comment notes the Phase I ESA recommends a Phase II ESA be completed, and further notes there is no evidence that a Phase II ESA was completed per the recommendation. The EIR has been updated to include the findings of the 2022 Phase I ESA (Appendix H-1), and a Phase II ESA, completed in April 2025 (Appendix H-3), as shown in Chapter 3, Changes to the Draft EIR, to this Final EIR. This addition does not change the impact conclusions in the Draft EIR, nor do they result in any new significant impacts or the need for new or altered mitigation measures. Rather, the additional text merely augments the discussion already presented in the Draft EIR, and results in no change to the conclusions or mitigation measures previously presented. A new significant impact would not occur nor would an increase in the severity of a previously identified significant impact would as a result. Therefore, this erratum does not warrant recirculation of the Draft EIR.

The updated findings of the 2022 Phase I ESA and 2025 Phase II ESA conclude that there are no hazardous waste concerns on the project site, and no additional actions are required.

A2-4 This comment notes that South Coast Air Quality Management District is not a certified oversight agency for asbestos, and oversight from DTSC or another agency would be required for asbestos survey and removal. This section has been modified to clarify the rules and regulations that control hazardous building material survey and abatement. Additionally, the Regulatory Framework, Section 4.8.2, has been updated to include additional rules and regulations associated with asbestos, lead-based paint, and universal wastes.

A2-5 This comment notes surveys should be completed for all potential hazardous building materials, including asbestos-containing materials, lead-based paint, mercury, and polychlorinated biphenyl caulk, and removal should be conducted in compliance with rules and regulations. The comment further states sampling near current and former buildings should be conducted in accordance with DTSC's PEA Guidance Manual.

As discussed in RTC A2-4, the section has been modified to clarify the hazardous materials building survey will include additional potentially hazardous building materials, such as mercury and polychlorinated biphenyls. Additionally, Regulatory Framework, Section 4.8.2, has been updated to include rules and regulations associated with universal waste management.

With regard to the PEA Guidance Manual, DTSC's suggestion is noted.

A2-6 Within this comment, DTSC recommends imported fill materials be screened for contamination to verify soils meet DTSC and USEPA Screening Levels for the intended use of the site. This comment is noted.

A2-7 This comment closes the comment letter. The comment does not raise any questions, comments or concerns about the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

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Response to Comment Letter A3

California Department of Fish and Wildlife
Victoria Tang, Environmental Program Manager
April 12, 2024

A3-1 This comment is from an email and serves as a transmittal for the California Department of Fish and Wildlife (CDFW) comment letter. The comment does not raise any questions, comments or concerns about the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

A3-2 This comment is introductory in nature and states CDFW's role as both a Trustee Agency and Responsible. The comment does not raise any questions, comments or concerns about the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

A3-3 This comment provides the project description. The comment does not raise any questions, comments or concerns about the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

A3-4 This comment provides the biological setting of the project. The comment does not raise any questions, comments or concerns about the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

A3-5 This comment provides the introduction to the comments and recommendations that come after. The comment does not raise any questions, comments or concerns about the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

A3-6 This comment is about the potential for an increase in human and wildlife interactions due to the recreational trail system through the project site and along Wiley Canyon Road. The comment states the trail would be asphalt and that the increased foot traffic would result in increased noise levels in sensitive areas, increased trash or pet waste, and introduction of unnatural food sources via trash and trash receptacles. The comment provides recommendations for not using asphalt and mitigation measures for public education, trash, and dogs.

As stated in Section 4.3.1.2, Project Setting, of the Draft EIR, the project site is situated on the east side of Interstate 5 freeway and it is a former agricultural land with large expanses of highly disturbed land surrounded by fencing. As shown in Table 4.12-2, Ambient Noise Measurements, of the Draft EIR, the ambient noise level pre-project are above 57.7 dBA. The increase in noise from foot traffic using the trail is not expected to add a substantial amount to the existing ambient noise level that is generated from traffic on Interstate 5.

CDFW's recommendation regarding the use of alternatives to asphalt is noted. As stated in Section 4.9.4, Hydrology and Water Quality-Impact Analysis, of the Draft EIR, the project would construct three drainage detention basins. As a result, with adherence to drainage control requirements, water quality impacts during project operations would be less than significant.

For the mitigation measures for public education, trash, and dogs are noted and may be included in the final project design, since these measures do not address a specific impact. As stated in Table 4.10-2, General Plan Land Use Consistency Analysis, of the Draft EIR, the project would be consistent

with Policy Land Use 6.2.2, which states: provide and enhance trail heads where appropriate with landscaping, seating, trash receptacles and information kiosks the site. As stated in Section 3.4.8.3, On-site Infrastructure Improvements, a 5-foot vinyl or wood lodge pole fence would be installed along the proposed asphalt trail which would limit access into the stream and its associated habitats.

A3-7 This comment is about the mitigation measure (MM-BIO-4) proposed in the Draft EIR being insufficient to mitigate the project's impact on sensitive natural communities and seeks to revise MM-BIO-4 of the Draft EIR. The project would impact 0.09 acre of the Fremont cottonwood/mulefat forest, 0.60 acre of the Fremont cottonwood forest, and 0.09 acre of the California sycamore woodland, which are considered sensitive vegetation communities. MM-BIO-4 of the Draft EIR provides for 1:1 mitigation either through implementation of an onsite habitat mitigation and monitoring plan (HMMP) or through off-site restoration or enhancement at a ratio no less than 1:1 and may include the purchase of mitigation credits at an agency- approved off-site mitigation bank or an in-lieu fee program within Los Angeles County acceptable to the City.

The approximately 0.78-acre of sensitive vegetation communities is associated with a 0.33-mile earthen section of the South Fork of the Santa Clara River. As stated in Section 4.3.1.2 of the Draft EIR, the stream is heavily modified and channelized as it flows through the urbanized area. The river is channelized upstream (east of Interstate 5) of the project and downstream of the project for approximately 1.6 miles. If onsite mitigation is implemented, then the loss would be mitigated locally and the performance standards required by the HMMP are expected to result in the establishment of higher quality habitat than the existing conditions. If the mitigation is implemented offsite, then the credits purchased at a mitigation bank or in-lieu fee program would be expected to support larger more continuous areas of similar riparian vegetation that would have a higher value than the existing onsite sensitive vegetation due to its size. As such, 1:1 mitigation for impacts of relatively small amount of isolated and disturbed sensitive vegetation would be sufficient to reduce impact to less than significant.

A3-8 This comment is about the mitigation measure (MM-BIO-1) proposed in the Draft EIR not being sufficient to mitigate for impacts to Crotch's bumble (*Bombus crotchii*). The comment provides revisions to MM-BIO-1. The revisions are accepted and will be incorporated into the Final EIR.

A3-9 This comment states that the project may impact supporting habitat for arroyo toad (*Anaxyrus californicus*) and provides a recommendation for consulting with the U.S. Fish and Wildlife Service and doing focused surveys for the species. The CDFW-managed California Natural Diversity Database (CNDDB) describes the species micro-habitat as being rivers with sandy banks, willows, cottonwoods, and sycamores; loose, gravelly areas of streams in drier parts of range. As stated in Section 4.3.1.2 of the Draft EIR, the 0.33-mile earthen section of the South Fork of the Santa Clara River within the project site is heavily modified and channelized and is marginally suitable habitat for the species. Per the CNDDB, there are no nearby source populations and the river is channelized upstream (east of Interstate 5) of the project and within and downstream of the project for approximately 1.6 miles. As such, a sustainable population of arroyo toad would not be expected to occur in the project site and no consultation or mitigation measures would be necessary.

A3-10 This comment states that the project may impact supporting habitat for coastal whiptail (*Aspidoscelis tigris stejnegeri*) and California legless lizard (*Anniella* spp.). As stated in Section 4.3.1.2 of the Draft EIR, there is marginally suitable habitat for the two species present onsite. As such, the project site is not expected to support populations of the species and impacts, if any, would not substantially reduce

the habitat of the species or cause either species' population to drop below self-sustaining levels. Therefore, a biological monitor and compensatory mitigation for the loss of habitat is not warranted.

A3-11 This comment states that project activities will result in tree removal which may serve as a host for invasive pests and diseases and provides a potentially feasible mitigation measure. The mitigation measure includes a measure for a certified arborist to evaluate trees for infectious tree diseases. Appendix C-2, Oak Tree Report, states that a Registered Consulting Arborist did conduct an evaluation of trees onsite that included noting damage caused by pathogens or insect pests. The report does not mention positive results for damage caused by pathogens or insect pests. Accordingly, additional evaluation for the trees onsite is not warranted.

A3-12 This comment recommends that the project proponent retain a qualified biologist(s) that holds a Scientific Collecting Permit issued by CDFW. As stated in Section 4.3.1.2 of the Draft EIR, only three species were considered to have a moderate potential to occur on the project site: including Crotch bumble bee, Cooper's hawk (*Accipiter cooperii*), and least Bell's vireo (*Vireo bellii pusillus*). MM-BIO-1 of the Draft EIR provides minimization and avoidance measures to decrease impacts to Crotch's bumble bee. MM-BIO-2 of the Draft EIR provides minimization and avoidance measures to decrease impacts to least Bell's vireo. MM-BIO-3 of the Draft EIR provides minimization and avoidance measures to decrease impacts to nesting birds, including Cooper's hawk. None of the three mitigation measures require handling of the species so an SCP would not be warranted.

A3-13 This comment recommends that the landscaping plant palette should not include non-native, invasive plant species. As stated in Table 4.10-2, General Plan Land Use Consistency Analysis, of the Draft EIR, the project would be consistent with the General Plan Policy LU 4.5.2 and per Chapter 17.51 of the City's Unified Development Code, the project's landscape design would be required to emphasize drought-tolerant and/or native species.

A3-14 This comment is a recommendation that the project use wildlife friendly fencing. As stated in Section 4.3.4 of the Draft EIR, the Study Area supports potential live-in and movement habitat for species on a local scale (i.e., some limited live-in and at least marginal movement habitat for reptile, bird, and mammal species), but the habitat likely provides little to no function to facilitate wildlife movement for wildlife species on a regional scale. The project site is located adjacent to Interstate 5 with development to the north, west, and south. As such, wildlife use of the project site is expected to reduce with the incorporation of walls and fences along the project site's boundary, which would preclude wildlife movement. As detailed in Chapter 3, Project Description, of the Draft EIR, the Project proposes a 6-foot masonry wall at the northern boundary and a 5-foot retaining wall is proposed on the earth berm at the site's western border. To the east, a 5-foot vinyl or wood lodge pole fence would be installed along the asphalt trail. Moreover, wildlife expected to occur are anticipated to be adapted to the urban environment.

A3-15 This comment is about submitting records for special-status species to CDFW for incorporation in the CNDDB. As stated in Section 4.3.1.2 of the Draft EIR, no special-status plants or wildlife were observed on the project site, so no record submittals are necessary for the project.

A3-16 This comment is about incorporating CDFW's recommended mitigation measures and revisions to mitigation measure in the project's Mitigation and Monitoring Reporting Plan. Per the previous responses to CDFW comments, MM-BIO-1 of the Draft EIR will be revised per the recommendations.

A3-17 This comment is about the project proponent paying filing fees per Cal. Code Regs, tit. 14, § 753.5; Fish & Game Code, § 711.4; Pub. Resources Code, § 21089. The comment does not raise any questions, comments or concerns about the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

A3-18 This comment is the conclusion to the letter. The comment does not raise any questions, comments or concerns about the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

A3-19 This comment is Attachment A; Draft Mitigation and Monitoring Plan that includes the recommending mitigation measures and recommendations included in the previous comments. See responses A3-6 to A3-14 for responses to the proposed mitigation measures and recommendations.

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Response to Comment Letter A4

California Department of Transportation (Caltrans) District 7
Alan Lin, P.E., Transportation Engineer, Civil
April 15, 2024

A4-1 The comment states a letter is attached. The attached letter is included as Comment A4-2 through A4-7. No response is required.

A4-2 The comment summarizes the proposed project description, vehicle miles traveled (VMT) thresholds, and project design features (PDFs) introduced to reduce impacts. Given that this comment correctly states the contents of the Draft EIR, no response is required.

A4-3 This comment provides additional Transportation Demand Management (TDM) options for consideration. The comment does not request revisions to the PDFs in Comment A4-2. No response is required.

A4-4 The comment concurs with the Traffic Analysis prepared for the proposed project, including the impact determination and recommended improvements to Caltrans facilities. Given that this comment correctly states the contents of the Draft EIR, no response is required.

A4-5 The comment states project activities within the Caltrans right-of-way will require an encroachment permit. Further, modifications to State facilities must meet mandatory design standards and specifications. Given this requirement, the revision has been made to the EIR. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

A4-6 This comment recommends the City prepare a post-development VMT analysis for the proposed project. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. Furthermore, the City complied with the requirements of CEQA, which is substantiated by a VMT analysis memorandum, prepared by Stantec and included as Appendix K-1 of the Draft EIR. The project's potential VMT was evaluated for both the residential component and employment-generating component. As a result, the Draft EIR determined less-than-significant impacts would occur given the project's VMT per capita with VMT reductions is below the thresholds. Given this, no change or addition to the environmental analysis included in the Draft EIR is required. The comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

A4-7 This comment states a Caltrans transportation permit would be required for the use of heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways. Moreover, the comment states large-size truck trips should be limited to off-peak commute periods. Given this requirement, the revision has been made to the EIR. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

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Response to Comment Letter A5

Local Agency Formation Commission of the County of Los Angeles
Paul A. Novak, AICP
February 29, 2024

A5-1 The comment states consideration should be made for potential annexations and/or Sphere of Influence amendments to special districts, including but not limited to the following: the Santa Clarita Valley County Sanitation District, the Santa Clarita Valley Water Agency, the Greater Los Angeles Area Vector Control District, and the Antelope Valley Resource Conservation District. Annexation with the Santa Clarita Valley County Sanitation District is underway; no annexation with Santa Clarita Valley Water Agency is required or any other special districts.

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Response to Comment Letter A6

Los Angeles County Sanitation Districts
Patricia Horsley, Environmental Planner
April 2, 2024

A6-1 The comment notes receipt of the NOA for the proposed project. In addition, the comment notes prior comment letters submitted are included (see Comments A6-4 through A6-15)

A6-2 The comment states annexation of the project area is currently being processed. This comment is similar to the Comment A5-1. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

A6-3 The comment provides the expected average wastewater flow and citations for Alternative 2, Affordable Housing Alternative, of the Draft EIR.

The analysis contained in Chapter 6, Alternatives, of the Draft EIR provide a comparison between the proposed project and alternatives under consideration. Under Utilities and Service Systems, the Draft EIR concluded impacts would be slightly greater than the proposed project given that Alternative 2 is expected to result in an increase in population when compared to the project (Draft EIR, p. 6-17). The comment states 155,376 gallons of wastewater per day is anticipated under Alternative 2. As described in Section 4.18, Utilities and Service Systems, the Sewer Area Study (Appendix M to the Draft EIR) prepared for the project estimates 0.31 million gallons (310,000) per day is anticipated (Draft EIR, p. 4.18-12). As such, based on wastewater generation, impacts under Alternative 2 would be less than the proposed project. However, as described in Chapter 6, an increase in the generation of solid waste is anticipated. Although impacts are anticipated to remain less than significant, impacts under Alternative 2, in light of the comment, would be similar to the proposed project. Given this, a revision has been made to the EIR.

A6-4 This comment represents a comment letter to the NOP, which was originally dated April 7, 2022. Comments received on the NOP were considered while preparing the Draft EIR. Moreover, this comment is similar to Comment A6-2, above. See Response to Comment A6-2. No further response is required.

A6-5 The comment provides an expected average wastewater flow for the proposed project, as described in the NOP, to result in 93,176 gallons per day.

A6-6 This comment is the same as Comment A6-12. See Response to Comment A6-12 for more details. No further response is required.

A6-7 This comment states the wastewater capacity for the Santa Clarita Valley Joint Sewerage System. The information presented in the comment letter is included in the environmental setting of Section 4.18 (Draft EIR, p 4.18-2). Given this, no new information has been presented. No change or addition to the environmental analysis included in the Draft EIR is required.

A6-8 This comment is the same as Comment A6-13. See Response to Comment A6-13 for more details. No further response is required.

A6-9 This comment is the same as Comment A6-14. See Response to Comment A6-14 for more details. No further response is required.

A6-10 This comment represents a will serve letter for the proposed project, which was originally dated May 2, 2022. The Draft EIR cites this letter in Section 4.18 as substantiation for the conclusions of the environmental analysis. Given this consideration, the comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

A6-11 This comment is similar to Comment A6-10. See Response to Comment A6-10 for more discussion. No further response is required.

A6-12 This comment is similar to Comment A6-10. See Response to Comment A6-10 for more discussion. No further response is required.

A6-13 This comment is similar to Comment A6-10. See Response to Comment A6-10 for more discussion. No further response is required.

A6-14 This comment is similar to Comment A6-10. See Response to Comment A6-10 for more discussion. No further response is required.

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Response to Comment Letter A7

Santa Monica Mountains Conservancy
Steve Veres, Chairperson
April 12, 2024

A7-1 This comment is from an email and serves as a transmittal for the Santa Monica Mountains Conservancy comment letter. The comment does not raise any questions, comments or concerns about the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

A7-2 This comment states the Draft EIR is flawed due to the lack of analysis of onsite and local wildlife movement and habitat connectivity potential. This includes habitats located west of Interstate 5 to a habitat block that abuts the east side of Wiley Canyon Road. Section 4.3.4 of the Draft EIR includes an analysis of wildlife movement that includes local and regional movement.

A7-3 This comment states the Draft EIR did not analyze a habitat connection under Interstate 5, by channel and culvert, via the South Fork of the Santa Clara River and that the Draft EIR dismissed the river as a whole for wildlife movement. As stated in Section 4.3.1.2 of the Draft EIR, the project site does not represent significant corridors for wildlife movement to and from adjacent sites; however, it did recognize that the South Fork of the Santa Clara River onsite is a regional wildlife movement corridor and it does state that a majority of this area would be maintained and the project proposes to widen the existing channel to create additional riparian habitat. The river is a concrete sided and bottomed channel in the northern portion of the project site upstream, and that condition continues downstream of the project for approximately 1.6 miles. As for the culvert beneath Interstate 5, the culvert is approximately 665 feet in length and is beneath a highly used roadway. The culvert begins on the upstream end from a concrete-sided and bottomed channel that continues for 2,000 feet to the south (upstream) and is adjacent to Interstate 5, the Calgrove Boulevard on- and off-ramps, and commercial businesses that are fenced. The Calgrove Boulevard underpass beneath Interstate 5 would be expected to support more larger, terrestrial wildlife movement from east to west due to its height and width, while avoiding the exposure of the concrete channel. Therefore, further analysis of the culvert is not warranted.

A7-4 This comment states the Draft EIR did not analyze a second connection from a culvert beneath Interstate 5 that carries the water from the Lyons Canyon drainage to just north of the project site. The culvert in question runs beneath Interstate 5 for almost 400 feet and exits into a concrete-sided and bottomed channel within a fenced in area adjacent to residential properties. It continues as a concrete-sided and bottomed channel before it reaches the project site. Accordingly, wildlife movement through this connection is expected to be low. Therefore, further analysis of this culvert is not warranted.

A7-5 This comment states that Alternative 4 in the Draft EIR should be the preferred alternative since it is the environmentally superior alternative. However, as stated in Section 6.4.4.1 of the Draft EIR, the potential impacts associated with the South Fork of the Santa Clara River would remain under this alternative.

A7-6 This comment states that no Draft EIR alternative expands the riparian habitat area where the south fork emerges from a culvert that the comment claims is a wildlife receiving and sending area between the Santa Susana and San Gabriel mountains. As discussed in A7-3, the culvert begins on the upstream

end from a concrete-sided and bottomed channel that continues for 2,000 feet to the south (upstream) and is adjacent to Interstate 5, the Calgrove Boulevard on- and off-ramps, and commercial businesses that are fenced. The Calgrove Boulevard underpass beneath Interstate 5 would be expected to support more larger, terrestrial wildlife movement from east to west due to its height and width, while avoiding the exposure of the concrete channel.

A7-7 This comment is a conclusion to the letter but it does state that the project would result in a significant adverse impact to habitat connectivity between the Santa Susana and San Gabriel mountains across Interstate 5. As discussed in A7-3, the culvert begins on the upstream end from a concrete-sided and bottomed channel that continues for 2,000 feet to the south (upstream) and is adjacent to Interstate 5, the Calgrove Boulevard on- and off-ramps, and commercial businesses that are fenced. The Calgrove Boulevard underpass beneath Interstate 5 would be expected to support more larger, terrestrial wildlife movement from east to west due to its height and width, while avoiding the exposure of the concrete channel.

A7-8 This comment is an attached exhibit that illustrates the theorized connections proposed in the letter. The comment does not raise any questions, comments or concerns about the adequacy of the environmental analysis in the Draft EIR. No further response is provided.

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Response to Comment Letter A8

Los Angeles Sheriff's Department
Bee Bee Pee, Facilities Planning Bureau
April 15, 2024

A8-1 The comment requests an extension to the public comment period. The City accepted a comment letter from the Sheriff's Department on April 18, 2024, included as Comment Letter A9. See Response to Comment A9 for more details.

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Response to Comment Letter A9

Los Angeles Sheriff's Department
Facilities Planning Bureau
Tracey Jue, Bureau Director
April 18, 2024

A9-1 This comment states a letter is attached. The attached letter is included as Comment A9-2 through A9-16. No response is required.

A9-2 The comment states the project is located within the service area of the Santa Clarita Valley Sheriff's Station. The comment states the project would affect current service levels and the project applicant would be required to pay development fees, as applicable. This comment is consistent with the Draft EIR's analysis regarding police protection services (Draft EIR, p. 4.14-11). The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

A9-3 This comment correctly summarizes the proposed project description. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

A9-4 The comment correctly notes the Draft EIR concluded less-than-significant impacts would occur related to population and housing, as described further in Section 4.13, Population and Housing, of the Draft EIR.

In addition, the comment states the Draft EIR should include analysis of the project's effect on local transportation and circulation. The Draft EIR includes analysis related to transportation within Section 4.16, Transportation, of the Draft EIR. Moreover, the comment suggests the preparation of a Construction Mitigation Plan to help reduce impacts to traffic and address emergency access. Section 4.16 of the Draft EIR addressed impacts related to emergency access and concluded less than significant impacts would occur in accordance with local requirements, including the City design standards (Draft EIR, pp. 4.16-19 and 4.16-20). For informational purposes, emergency access mitigation related to wildfire is included in Section 4.19, Wildfire, of the Draft EIR. Given this, no change or addition to the environmental analysis included in the Draft EIR is required. The comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

A9-5 The comment states the proposed project would result in a cumulatively considerable impact in combination with related developments within the City for which the Sheriff's Station serves. Section 4.13, Population and Housing, of the Draft EIR determined the project's impacts would be cumulatively less than significant given the project would not induce substantial residential and employment growth when compared to projections for the Santa Clarita Valley (Draft EIR, pp. 4.13-7 and 4.13-8). The project's cumulative impacts were also assessed in Section 4.14, Public Services. Although the project would increase demand for public services, such as police protection services from the Sheriff's Department, impacts would be minimal and are not expected to increase demand beyond a level of adequate service. This determination is based on responses to the City's request for information and the Santa Clarita Valley Station's response on November 17, 2022. Moreover, the project applicant would pay development impact fees, in accordance with the Santa Clarita Municipal Code, to pay its

fair share of the costs of facilities, personnel, and equipment determined to be necessary to adequately accommodate the proposed project. Cumulative impacts were assessed based on a related projects list determined in Appendix K, Traffic Impact Analysis, of the Draft EIR, and identified in Table 3-4 of Chapter 3, Project Description. As such, the comment's concern regarding cumulative impacts is addressed in the Draft EIR. Given this, change or addition to the environmental analysis included in the Draft EIR is required. The comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

A9-6 The comment cites the Draft EIR's determination on public services, in which less than significant impacts would occur. However, the comment states the project would increase demand on police protection services. The comment further states the Santa Clarita Valley Station is currently understaffed. As discussed above in Response to Comment A9-5 and in Section 4.14, Public Services, of the Draft EIR, the project applicant would pay applicable development impact fees, in accordance with the Santa Clarita Municipal Code, to reduce impacts. Although an increase in demand is expected, the impacts were determined to not increase demand beyond a level of adequate service. This determination is based on responses to the City's request for information and the Santa Clarita Valley Station's response on November 17, 2022. Moreover, the City acknowledges the Sheriff's Department's operational funding is derived from various types of tax revenue (property taxes, sales taxes, user taxes, vehicle license fees, deed transfer fees, etc.), which are deposited in the County's General Fund. The Board of Supervisors allocates the revenue for various County-provided public services, including the Santa Clarita Valley Station. While these funding sources are subject to review and approval as part of the Board of Supervisors budgeting process, the County is obligated to provide funding to the Sheriff's Department in order to fulfill its constitutional obligation to prove adequate public safety services. Article XIII, Section 35(a)(2) of the California Constitution mandates that "[t]he protection of the public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Therefore, it is reasonable to assume that the Sheriff's Department will continue to receive annual funding. No changes to content or analyses in the Draft EIR are required as a result of this comment.

A9-7 The comment suggests that the proposed project includes a landscaping maintenance program to minimize opportunities for individuals to hide and recommends limiting height of plants around security gates to increase visibility. This comment does not express any environmental concerns related to the environmental analyses contained in the Draft EIR. However, the comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

A9-8 The comment requests the installation of security cameras and motion-sensor lighting among other design features to improve monitoring on site. This comment does not express any environmental concerns related to the environmental analyses contained in the Draft EIR. However, the comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

A9-9 The comment requests the project install security lighting throughout the site. Similar to Response to Comment A9-8, this comment does not express any environmental concerns related to the environmental analyses contained in the Draft EIR. However, the comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

A9-10 The comment suggests traffic and security plans to be developed to address potential crime on site. This comment does not express any environmental concerns related to the environmental analyses

contained in the Draft EIR. However, the comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

A9-11 The comment suggests numerical addresses are placed on the corner of proposed buildings. This comment does not express any environmental concerns related to the environmental analyses contained in the Draft EIR. However, the comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

A9-12 The comment requests notification of any methane extraction systems on site. The comment suggests this in the event landfill mitigation is required. According to the Phase I Environmental Site Assessment (ESA) prepared for the project and included as Appendix H to the Draft EIR, a landfill is not one of the historical land uses for the project site. Furthermore, as detailed in Section 4.8, Hazards and Hazardous Materials, of the Draft EIR, impacts were determined to be less than significant. No mitigation is required. Given this, no changes to content or analyses in the Draft EIR are required as a result of this comment.

A9-13 The comment proposes a vehicular exit on the south side of the project site for emergency ingress/egress. The project's proposed plans would adhere to all emergency ingress and egress requirements in accordance with building code and fire code requirements. Moreover, an emergency access is proposed on the northern side of the property from Hawkbryn Avenue. The proposed site plan will be reviewed and approved by the fire department during the plan check and permitting process. Given that the Draft EIR considers emergency ingress/egress on site and impacts related to emergency access are considered less than significant, no changes to the analyses in the Draft EIR are required as a result of this comment.

A9-14 This comment states the Santa Clarita Valley Station may provide further comments upon subsequent reviews of the proposed project. This comment does not express any environmental concerns related to the environmental analyses contained in the Draft EIR. However, the comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

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Response to Comment Letter A10

County of Los Angeles Fire Department
Prevention Services Bureau
Ronald M. Durbin, Chief, Forestry Division
April 10, 2024

A10-1 The comment states the project site would be adequately served by fire protection services. Moreover, the comment suggests impacts would be less than significant in the absence of a cumulative impact. As detailed in Section 4.14, Public Services, of the Draft EIR, impacts related to fire protection services were found to be less than significant and not cumulatively considerable. Given this, no changes to the analyses in the Draft EIR are required as a result of this comment.

A10-2 The comment states the project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants. As stated in the Draft EIR, compliance with applicable regulatory requirements would occur during the plan check and permitting process. The proposed project has undergone review by the Consolidated Fire Protection District of Los Angeles County (LACFD). The LACFD provided a list of conditions on the project, which would be incorporated into the Conditions of Approval for consideration by the Planning Commission.

A10-3 This comment states that the proposed project would require secondary ingress/egress access. The City acknowledges this requirement, and this will be addressed through compliance with the conditions issued by the Fire Prevention Division.

A10-4 This comment states requirements for building heights and setbacks required by LACFD. The City acknowledges this requirement, and this will be addressed through compliance with the conditions issued by the Fire Prevention Division.

A10-5 This comment outlines the required fire flows for the project site and public fire hydrants. The City acknowledges this requirement, and this will be addressed through compliance with the conditions issued by the Fire Prevention Division.

A10-6 The comment states the project site is within a Fire Hazard Severity Zone, and the project must comply with requirements for brush clearance and prepare a fuel modification plan. The Draft EIR determined the project site is located within and surrounded by areas considered a Very High Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection (Cal Fire) (Draft EIR, pp. 4.19-3 and 4.19-4). As further detailed in Section 4.19, Wildfire, of the Draft EIR, the project's impacts related to wildfire would be less than significant with mitigation incorporated. The proposed mitigation would exceed code requirements for brush clearance and fuel modifications. For example, MM-FIRE-2, Pre-Construction Requirements, would require fuel modifications to be implemented and approved by the Fire Department before construction. Moreover, MM-FIRE-3, LACFD FMZ Plant Selection Guideline Compliant, would ensure proposed landscaping would not contribute to extreme fire behavior. As such, the Draft EIR as written adequately addresses this comment. No changes to the analyses in the Draft EIR are required as a result of this comment.

A10-7 The comment states the project will undergo building plan check review for specific fire and life safety requirements during construction. The comment does not contain any specific concerns related to the

adequacy or accuracy of the environmental analysis in the Draft EIR. However, for informational purposes, this comment is similar to Comment A10-6. See Response to Comment A10-6. No further response is required.

A10-8 The comment states the project requires an Oak Tree Permit in accordance with the Los Angeles County Oak Tree Ordinance. The project site is located within the jurisdictional boundaries of the City of Santa Clarita, and, therefore, is not subject to the provisions of the County's Oak Tree Ordinance. As detailed within the Draft EIR, the project is subject to a Oak Tree Permit (Santa Clarita Municipal Code section 17.51.040) for the removal of, encroachment, and impact to existing oak trees as a result of the project. As such, the Draft EIR as written adequately addresses this comment. No changes to the analyses in the Draft EIR are required as a result of this comment.

A10-9 The comment states the project site is located within a Fire Hazard Severity Zone. This comment is similar to Comment A10-6. See Response to Comment A10-6. No further response is required.

A10-10 The comment states the Health Hazardous Materials Division does not have comments at this time. No response is needed.

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Response to Comment Letter O1

Santa Clarita Sierra Club
Katherine Solomon, Conservation Chair
Sandra Cattell, Group Chair
March 17, 2024

O1-1 The comment states riparian habitat should be preserved and requests improvements on ingress/egress. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. For informational purposes, Section 4.3, Biological Resources, determined potentially significant impacts would occur to riparian habitats. However, with the implementation of MM-BIO-3, Nesting Birds, impacts would be reduced to a less-than-significant level. MM-BIO-3 would require enhancement or restoration of remaining on-site sensitive plant communities at a ratio of 1:1, among other actions. Moreover, the project's proposed plans would adhere to all emergency ingress and egress requirements in accordance with building code and fire code requirements. The comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

O1-2 The comment states the South Fork of the Santa Clara River is a blue-line stream and the project would affect riparian habitat. The comment also states the project would affect plants and animals, such as "Swanson's hawk" and gnatcatchers.

The Draft EIR acknowledged the commenter's concerns related to the blue-line waterway traversing the project site in Section 4.3, Biological Resources. Impacts were determined to be less than significant after implementation of MM-BIO-5, Jurisdiction Aquatic Resources. MM-BIO-5 would require regulatory permits from state and federal agencies, as well as restoration or enhancement efforts. Similar to Comment O1-1, MM-BIO-3 would be required to reduce impacts to riparian habitats to less than significant. Moreover, species such as the Swainson's hawk (*Buteo swainsoni*) are not expected to occur given the species was not observed or detected at the time of survey (Appendix C-1, Biological Resources Report, p. C-2). Similarly, coastal California gnatcatcher (*Polioptila californica californica*) was determined to not have suitable habitat and, thus, no potential to occur on the project site (Appendix C-1, p. C-2). Given this, no changes to the analyses in the Draft EIR are required as a result of this comment.

O1-3 The comment states 12 oak trees are on site, including two heritage trees with the potential for encroachment. The comment requests reduced impacts and compliance with the Oak Tree Preservation Ordinance.

As described in Section 4.3 of the Draft EIR, there are 36 oak trees located on or adjacent to the project site. The comment correctly notes a total of 12 oak trees on site, including two that qualify as heritage trees (Oaks #451 and #454). Thus, all potential oak tree impacts would require an oak tree permit from the City. Table 4.3-2, Oak Tree Plan Summary, identifies Oaks #451 and #454 would be impacted as a result of the project. The City's Oak Tree Preservation regulations outlines the requirements governing the protection and preservation of oak trees in the City, including regulations for cutting, damage, and encroachment on oak trees and oak woodlands. Protective fencing of not less than five feet in height at the limits of the Tree Protected Zone of all oak trees within or extending into the property that may be impacted by or are in close proximity (50 feet) to construction activities would be

installed before start of construction. The protective fencing would be inspected by a qualified biologist or arborist before grading or ground disturbing activities, and the fencing would be maintained and remain in place until construction is completed and a certified arborist verifies that it is appropriate to be removed. Additional mitigation measures are not required.

O1-4 The comment states riparian habitat should be preserved, and new landscaping should include only native plants that are drought tolerant and fire-resistant and in consultation with the fire department.

Regarding riparian habitat, see Responses to Comments O1-1 and O1-2.

Regarding landscaping, this comment does not express any environmental concerns related to the environmental analyses contained in the Draft EIR. However, the comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR. However, the Draft EIR includes discussion on consistency with landscaping standards. For example, implementation of MM-FIRE-3, LACFD FMZ Plant Selection Guideline Compliant, would ensure proposed landscaping would not contribute to extreme fire behavior, as further described in Section 4.19, Wildfire. Given this, the Draft EIR adequately addresses this comment. No changes to the analyses in the Draft EIR are required as a result of this comment.

O1-5 The comment raises concern for increase in traffic and congestion on Wiley Canyon Road due to detours at times when Interstate 5 experiences traffic congestion. The comment states that proposed roundabouts would not operate acceptably in the event of a wildfire with Interstate 5 was blocked. The comment suggests that installation of traffic signals at the Calgrove Boulevard and Interstate 5 northbound and southbound ramps intersections would not be adequate in the event an evacuation due to wildfire is required in the area. As shown in Appendix K-5 Wiley Canyon Mixed -Use Traffic Impact Analysis, the Calgrove Boulevard and Interstate 5 northbound and southbound ramps intersections would operate acceptably with either traffic control – traffic signal or a roundabout. The selection of traffic control would be per Caltrans discretion and preference for improving the operating conditions for all road users at these locations. In the event of a wildfire, an Evacuation Plan would be followed, and the traffic control of the intersections would be managed manually in order to direct and route traffic to zones. No changes to the analyses in the Traffic Study or Draft EIR are required as a result of this comment.

O1-6 The comment suggests that the project include a public transportation option that directly connects to the project site because the nearest bus stop is over a half-mile from the site. The Draft EIR notes in Section 4.16 under 4.16.5 Impact Analyses, that the project is proposing to add two bus stops on Wiley Canyon Road: a northbound and a southbound stop to be located north of the project entrance between Wabuska Street and the project entrance.

O1-7 The comment raises concern that the Traffic Study was prepared during the COVID pandemic and was unable to capture the commute traffic on Interstate 5 and the existing traffic conditions in the area. As noted in Appendix K-5 Wiley Canyon Mixed -Use Traffic Impact Analysis, Section 2.1.2 the traffic counts were collected during the period when most business and travel severe restrictions had been lifted. Additionally, the AM peak hour traffic counts were increased by 25% and the PM peak hour traffic counts were increased by 10% based on count comparisons in the LA County as well as count data provided by the City for pre-COVID conditions. Additionally, Appendix K-2 Wiley Canyon Road Area-Traffic Count Comparison Memo provides a comparison between the average daily traffic counts recollected

for Wiley Canyon Road and Calgrove Boulevard in September 2022 with the counts used in the traffic study. The traffic counts collected in September 2022 were not significantly higher or lower and were not found to affect the results of the traffic analysis provided in the traffic study. No changes to the analyses in the Traffic Study or Draft EIR are required as a result of this comment.

01-8 The comment raises concern for transportation safety and further cites concerns regarding sidewalks connecting to the project site. The Draft EIR analyzes environmental impacts related to safety and circulation within Section 4.10, Land Use and Planning, and Section 4.16, Transportation. For example, impacts related to the physical division of an established community would be less than significant (Draft EIR, pp. 4.10-8 and 4.10-9). Similarly, impacts related to consistency with a program, plan, ordinance, or policy addressing the circulation system would be less than significant (Draft EIR, pp. 4.16-13 through 4.13-16). Although the project's proposed entrance would be located at the northern end of the site, redevelopment of the project site would include off-site circulation improvements to Wiley Canyon Road, including improved sidewalks along the western edge and the southern portion of the project site (Draft EIR, p. 3-10). This would facilitate improved circulation between the project site and its surrounding vicinity when compared to existing conditions. Construction of these planned improvements would be in compliance with all applicable City regulations governing streets, sidewalks, and public access. Moreover, the project would include 1.3 miles of new pedestrian trails and sidewalks along the eastern perimeter of the site, which would connect the site's public amenities to the surrounding community. Directional signage would be used to promote walkability on site. Additionally, the project would include off-site roadway and lighting improvements which would enhance safety. Given this, the Draft EIR adequately addresses the comment's concerns. Nevertheless, the comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

01-9 The comment provides concerns on the density of proposed developed on the site which is located in a floodplain and the potential for problems due to locating structures on top of a floodplain. Impact HYD-3.iv on page 4.9-16 provides the analysis of the potential impacts related to impeding or redirecting flood flows as a result of construction of the proposed project. The project site is currently entirely within an identified Special Flood Hazard Area. However, the proposed project includes design measures such as the importation of 85,000 cubic yards of fill materials to regrade the site as well as provide bank improvements to the South Fork of the Santa Clara River. Following these changes, Mitigation Measure MM-HYD-1 would require that before commencement of construction, the applicant must obtain a Letter of Map Revision (LOMR) from the Federal Emergency Management Agency (FEMA) that is supported by a hydrology and hydraulics analysis to indicate that the proposed development would meet FEMA requirements and sufficiently reduce flood risks. Therefore, the proposed development would be required to include into design plans sufficient measures to reduce flood risks to a less than significant level consistent with FEMA requirements.

01-10 The comment claims that the proposed bank stabilization measures will negatively affect streams, tributaries, and riparian habitats of the upper Santa Clara River Watershed and neighboring communities. Appendix I-2 of the Draft EIR contains the hydrology and hydraulic analysis of the proposed bank stabilization measures including design criteria to ensure that adverse effects would not occur. The findings of this report demonstrated that the proposed development and modifications to the South Fork of the Santa Clara River would "not create any adverse off-site impacts or increase the flood hazard to the surrounding homes". The modeling results also showed that the proposed

changes would not increase sediment transport capacity to the downstream channel owned and maintained by Los Angeles County Department of Public Works (LACDPW). The analysis and report findings were prepared by California licensed Professional Engineers in accordance with current LACDPW hydrology and hydraulic design criteria and evaluated potential impacts of changes in the floodplain fluvial mechanics over a long-term basis. Therefore, considering the detailed design and analysis of the proposed bank stabilization changes that are consistent with County design criteria, the potential impacts would be less than significant.

01-11 The comment requests affordable housing units to be proposed, and states additional housing would improve the City's jobs-housing balance. As described further in Chapter 3, Project Description, of the Draft EIR, the project would include a senior living community with 61 assisted living units, 130 independent living units, and 26 memory care beds. In addition, the project would include 379 multifamily apartments. Regarding affordability of the proposed housing units, State CEQA Guidelines Section 15064(e) states, "economic and social changes resulting from a project shall not be treated as significant effects on the environment." Accordingly, the commenter's request for affordable housing does not pertain to the project's impacts on the environment pursuant to CEQA. Although the proposed project does not include affordable housing on site, the Draft EIR analyzes an alternative with deed-restricted affordable housing. Alternative 2, Affordable Housing Alternative, would develop the project site with 837 apartments, including 201 units designated for low- and very-low-income households. The comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

Regarding the City's housing goals and jobs-housing balance, the City has a goal of 10,031 new units to meet State-mandated regional housing needs (i.e., Regional Housing Needs Allocation) for the 6th cycle (2021-2029). As detailed above, the project would contribute to the City's goal by adding new housing on existing vacant land. Moreover, the project would not result in substantial unplanned population growth as demonstrated in Section 4.13, Population and Housing. A comparison of the project's contribution to housing, population, and employment projections was provided. Thus, less than significant impacts would occur (Draft EIR, pp. 4.13-5 through 4.13-7). Given this, the comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. No further response is required.

01-12 The comment states the Draft EIR should include comments made by agencies and organizations. Appendix A to the Draft EIR includes the NOP, as well as materials and comments provided during the project's Scoping Meeting. However, Appendix A erroneously omitted the comments provided during the NOP public review/scoping period. As such, the comment letters are included within Chapter 3, Changes to the Draft EIR, and appended to this Final EIR. Although the comment letters were not appended to the Draft EIR, Chapter 2, Introduction, provides a summary of the CEQA process, including discussion that the City received approximately 50 comment letters from agencies, organizations, and individuals. These comments informed the City's environmental review of the proposed project, as presented throughout the Draft EIR. Therefore, this addition does not change the impact conclusions in the Draft EIR, nor do they result in any new significant impacts or the need for new or altered mitigation measures. Rather, providing the comment letters within the Final EIR merely augments the discussion already presented in the Draft EIR, and results in no change to the conclusions or mitigation measures previously presented. A new significant impact would not occur nor would an increase in the

severity of a previously identified significant impact would as a result. Therefore, this comment does not warrant recirculation of the Draft EIR.

01-13 The comment raises concern for the project's compatibility with the surrounding community, impacts to riparian habitat, ingress/egress, wildfire emergency access, and flooding. The Draft EIR analyzes the aforementioned environmental topic areas within Section 4.1, Aesthetics, and Section 4.10, Land Use and Planning (compatibility); Section 4.3, Biological Resources (riparian habitat); Section 4.8, Hazards and Hazardous Materials, Section 4.16, Transportation, and Section 4.19, Wildfire (ingress/egress); Sections 4.8 and 4.19 (wildfire emergency access); and Section 4.9, Hydrology and Water Quality (flooding). Moreover, the Draft EIR determined the project would not result in significant and unavoidable impacts related to these environmental issues. In the event a potentially significant impact was identified, mitigation was incorporated to reduce impacts to a less-than-significant level. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

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Response to Comment Letter O2

Western States Regional Council of Carpenters
Attorneys for Western States Regional Council of Carpenters
Mitchell M. Tsai
March 18, 2024

O2-1 The comment represents a comment letter submitted to the Planning Commission on March 19, 2024. See Responses to Comment O2-1 through O2-5. No further response required.

O2-2 The comment describes the Western Carpenters union and identifies components of the proposed project. The comment correctly summarizes the proposed project's components. The comment notes additional letters may be submitted before consideration of the EIR's certification. In addition, the comment requests future notification regarding the proposed project. As specified in Section 3.7 of the Draft EIR, consideration of the requested approvals including the certification of the EIR would be made at a public hearing by the City's decision makers. As a result of this comment, the City will include the designated contacts for the Western States Regional Council of Carpenters in all future notices of actions or hearings related to the proposed project. Overall, this comment does not express any environmental comments or concerns related to the environmental analysis in the Draft EIR. No changes or additions to the project description or analyses included in the Draft EIR are required.

O2-3 The comment states the City should require the project to be built with trained local workers. Furthermore, the comment states local hire provisions would reduce vehicle trips, greenhouse gas emissions, and VMT, as well as provide local economic benefits. The comment cites an attached letter outlining an example. This letter is included as Comment O2-5 through O2-9. See Responses to Comments O2-5 through O2-9 for more discussion. Nonetheless, there are no significant short-term construction-related or long-term operational environmental impacts that are related to the length of vehicle trips or the proximity of workers to the project site, as further described in Section 4.2, Air Quality, Section 4.7, Greenhouse Gas Emissions, and Section 4.16, Transportation. Moreover, CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described in Section 4.7.4, Methodology. As described, construction of the proposed project is anticipated to start in 2025 and end in late 2027.[1] On-site sources of GHG emissions include off-road equipment and off-site sources including haul trucks, vendor trucks, and worker vehicles. Overall, the project is estimated to result in less than significant impacts. No changes to the Draft EIR are required and additional mitigation measures are not required to reduce GHG emissions. There is no obligation under CEQA to consider implementation of skilled and trained workforce requirements. However, the comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

Additionally, the comment notes the State passed the Affordable Housing and High Road Jobs Act of 2022 (via Assembly Bill 2022). The provisions of this law do not apply to the project as proposed. This

[1] As explained in Section 4.7 of the Draft EIR, if construction commences at a later date, then construction impacts would be lower than those analyzed due to the use of a more energy-efficient and cleaner burning construction vehicle fleet mix, pursuant to State regulations that require vehicle fleet operators to phase-in less polluting heavy-duty equipment. As a result, GHG impacts would be lower than the impacts disclosed in the Draft EIR.

comment does not express any environmental comments or concerns related to the environmental analysis in the Draft EIR. No further response is required.

02-4 The comment raises concern for the potential of COVID-19 during construction activities and recommends additional requirements to reduce public health risks. The comment includes requested construction site design requirements, testing procedures, and safety planning requirements. As described in CEQA Guidelines Section 15064(d), CEQA requires the evaluation of physical changes in the environment which may be caused by the project and does not require analysis of the impacts of the existing environmental conditions on a project's future users. Additionally, the CEQA Guidelines do not expressly require public health effects from COVID-19 or any other communicable virus (i.e., influenza, legionnaires disease) be evaluated as potential impacts to the environment. Such viruses are not caused or exacerbated by construction projects. If approved, the project's construction contractor can impose requirements for construction personnel to minimize the spread of COVID-19 or any other communicable virus consistent with their company policy and any local or state requirements that may be in place at the time. Moreover, compliance with existing protocols from federal, state, and local public health agencies, including the Los Angeles County Department of Public Health, would address workplace health and safety. As such, the comment does not raise any specific environmental issues related to the adequacy or accuracy of the Draft EIR; therefore, no further response is required. The comment's request will be provided to the City's decision makers as part of the Final EIR.

02-5 The comment provides an introduction to a technical report, Local Hire Requirements and Considerations for Greenhouse Gas Modeling, by Soil Water Air Protection Enterprise (SWAPE), which discusses local hire policies and GHG modeling. The comment does not raise any specific environmental issues related to the adequacy or accuracy of the Draft EIR; therefore, no further response is required.

02-6 The comment discusses the emission calculation methodology for CalEEMod and claims that vehicle running emissions can be reduced by reducing trip lengths by way of local hire requirements or otherwise, but does not identify how the trip length would be reduced, no further action is required. See responses to additional related comments O2-7 through O2-9 and responses.

02-7 The comment discusses CalEEMod methodology and CalEEMod default trip lengths and does not pose any questions, no further action is required. See additional related comments O2-8 through O2-9 and responses.

02-8 The comment provides an example analysis of a different project showing a reduction of GHG emissions with a reduction in the worker trip length. The comment further explains that they provide an example and acknowledge that it does not indicate local hire requirements would result in a reduction in emissions for all projects. The commenter does not provide evidence to support a reduction of the worker trip length based on the location of the project and workforce. In addition, regarding GHG emissions, Section 4.7 of the EIR concluded that GHG emissions from the project would be less than significant, for the reasons explained therein. The comment letter also does not provide evidence that local hire requirements would result in reduced-construction related GHG emissions for the project, as the example analysis attached to the letter from SWAPE expressly states that "it does not indicate that local hire requirements would result in reduced construction-related GHG emissions for all projects." Because the project would not result in a significant impact from GHG emissions, it is not necessary or

appropriate to adopt mitigation to address construction-related GHG emissions. No further action is required.

02-9 Comment provides CalEEMod trip length data and does not pose a question related to the project; no additional response is required.

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Response to Comment Letter O3

Santa Clarita Organization for Planning and the Environment (SCOPE)
April 15, 2024

03-1 The comment represents an email requesting for an acknowledgement of receipt of the attached letter, included as Comments O3-2 through O3-19. The City received the comment letter. See Responses to Comments O3-2 through O3-19 for discussion.

03-2 The comment is an introductory statement identifying the commenter. No response is required.

03-3 The comment correctly summarizes the proposed project description. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

03-4 The comment states there is general support for the proposed project; however, the comment raises concern for the size of the project and proximity to the freeway.

Regarding the project's size and compatibility with the neighborhood, the Draft EIR includes analysis within Section 4.1, Aesthetics. For example, a consistency analysis for the project with the Community Character and Design Guidelines was conducted. The project is subject to Santa Clarita Municipal Code Section 17.55.040, Architectural and Design Standards. As further shown in Table 4.1-1 of the Draft EIR, the project would be consistent with the aesthetic components of the City's Design Guidelines. Furthermore, as detailed in Section 4.10, Land Use and Planning, the project was determined to be consistent with the standards for height and density. The comment was not specific in the concern; however, in addition to analysis contained in the Draft EIR, the City conducted a plan check review for the project's compatibility with applicable land use and zoning regulations for the site.

Regarding air quality concerns related to the freeway, the project's impact to air quality, including toxic air contaminants (TACs) such as diesel particulate matter, are discussed in Section 4.2, Air Quality, of the Draft EIR. As detailed under the methodology, guidance on mobile source emissions by the California Air Resources Board (CARB) states TAC exposure and health risk drops substantially within the first 300 feet from a freeway and generally recommends avoiding sensitive land uses within 500 feet of a freeway (Draft EIR, p. 4.2-27). The closest lane of traffic on the I-5 freeway would be approximately 66 feet to 115 feet from the project site property line where the proposed development would occur. The proposed townhomes along the project site's western boundary would have an additional buffer distance ranging from approximately 5 feet to 24 feet from the property line. Thus, a Health Risk Assessment (HRA), included as Appendix B, was conducted to disclose the potential risk to future occupants of the proposed project. As a result, the maximum calculated cancer risk was estimated, and in accordance with Title 24 of the California Code of Regulations that require installation of window filters, impacts were determined to be less than significant.

03-5 The comment states the project is inconsistent with the City's plans for Wiley Canyon Road. As discussed in the Draft EIR, Wiley Canyon Road is designated by the General Plan as a Secondary Highway, which is a four-lane road configuration, along the project frontage. However, the proposed project improvements would maintain a two-lane roadway configuration. For more discussion regarding Wiley Canyon Road, see Topical Response No. 3 – Traffic and Circulation. Based on the projected future

traffic volumes, including those generated by the proposed project, it is not anticipated that this segment of Wiley Canyon Road will require expansion to four lanes. The anticipated traffic volumes fall well within the maximum capacity of a two-lane roadway. As part of the proposed project, the dedication and acquisition of right-of-way mainly on the west side of Wiley Canyon Road (adjacent to project frontage) will be necessary for identified street improvements in the Traffic Study. Should the need for a four-lane roadway arise in the future, Wiley Canyon Road can be designed to accommodate four lanes using the right-of-way dedicated by this project, even at its narrowest section at 53 feet.

03-6 The comment states a General Plan amendment is required, similar to the discussion provided in Comment O3-5. This comment cites General Plan policies and asserts the project is inconsistent with the General Plan. See Response to Comment O3-5 for more discussion.

03-7 The comment raises concern regarding proposed senior care unit use and adequacy of access via proposed roundabouts at the project driveway for vehicles such as fire trucks and ambulances during any emergency. As noted in Section 4.16, Transportation, of the Draft EIR, the proposed roundabout, internal roadways (private drive and fire lane) and parking aisles will comply to City's design standards to provide adequate width, clearance and turning radii and turnaround requirements for all vehicles including fire apparatus. Emergency access to the site will also be available from Hawkbryn Avenue. During an emergency, such as wildfire, the components of the Wildfire Evacuation Plan will be implemented and the senior population will be assisted by the Fire Safety Coordinator and staff for the Senior Living Facility.

03-8 The comment correctly notes the project site designated as a Very High Fire Hazard Severity Zone and states several wildfires have occurred within the project site's vicinity. The comment further cites the Draft EIR Appendix N on estimated evacuation times and the use of Calgrove Boulevard. The comment raises concern for past wildfire events which have closed Calgrove Boulevard. Due to traffic circulation, evacuation will increase to as long as 15 minutes for residents North of the project. "According to a conservative evacuation modeling approach performed by CR Associates with input from Dudek and included in an Evacuation Plan for the project (Appendix N), it would take between 42 minutes and 63 minutes to evacuate the existing land uses and 52 minutes to evacuate the project. Under this scenario, the project would not cause an increase in evacuation time for evacuees leaving the communities east of the proposed project off of Calgrove Boulevard, but the project would cause an increase of 15 minutes to the community directly north of the proposed project and south of Wabuska Street."

The evacuation study assumes that exiting along Calgrove onto the I-5 freeway will be a safe route. In fact, some previous fires have closed that area and made evacuation along Wiley Canyon the only route out. The evacuation scenario should be re-calculated with that fact in mind. The EIR found these evacuation times not to be significant, but in a fast-moving wind-driven fire, lives would certainly be lost in the traffic jam.

As stated in Section 3.4.7.1, Project Description, Fire Protection, and Appendix N, Wildfire Evacuation Plan, of the Draft EIR, the project is located within a Very High Fire Hazard Severity Zone. Additionally, as stated in Section 4.19, Wildfire, and graphically represented in Figure 4.19-2, Fire History, of the Draft EIR, fire history is provided within a 5-mile radius of the project and fires have occurred south and west of the project.

The comment also provides a summary of the findings from Section 4.19, Wildfire, and Appendix N, Wildfire Evacuation Plan, of the DEIR, and states based on historical evacuations of the area the EIR should consider an evacuation scenario where only Wiley Canyon would be the only available route for evacuation. Current emergency evacuation protocols are designed to prioritize moving evacuees away from immediate danger, except in situations where a roadway leads directly into the fire, making it unsuitable as an evacuation route. For example, during the 2018 South Fire, an evacuation order was issued for all residences south of Calgrove Boulevard, and access to Calgrove Boulevard was closed to facilitate a more efficient evacuation process. Importantly, the area encompassing the Wiley Project was not placed under an evacuation order. Therefore, any assumption that both Calgrove Boulevard would be closed and the proposed project would be ordered to evacuate remains purely speculative and is not supported by sufficient evidence at this time.

03-9 The comment raises concern regarding the adequacy of the proposed parking spaces and shared parking analysis for the project. The comment incorrectly states that parking calculations are based on an old methodology and have not been substantiated in DEIR or the Parking Demand Study, for project uses such as senior living units. It should be noted that the project exceeds the City's parking requirements (see Topical Response 1). Nonetheless, a parking demand analysis was prepared for the project using the industry standard Shared Parking methodology, provided in the Urban Land Institute's Shared Parking Third Edition Report. The study was first printed in 1983, updated in 2005 and recently updated in 2020. For the update printed in 2020, the parking data and ratios use pre-COVID parking data and are based on most recent trends in mixed-use developments supported by the National Parking Association and the International Council of Shopping Centers. The Shared Parking Demand Summary table is generated from the Shared Parking study using an application and provides all the calculations accurately. As shown in the table, the parking demand estimation accounts for all the proposed uses including employees, and visitors commercial use and the health club (3 spaces for employees and 28 spaces for visitors), active adults (118 parking spaces) and residents in senior housing (36 parking spaces), along with 512 reserved spaces for the residential units and 38 for visitors, for a total demand of 734 spaces on a weekday.

03-10 The comment states palm trees should be prohibited due to the site's location with a Very High Fire Hazard Severity Zone. The comment also notes a comment letter provided by the Santa Clarita Valley Water Agency (included as Comment 03-17). The comment states the letter was excluded from the EIR. However, this letter was included as part of Appendix L, Water Supply Assessment, to the Draft EIR. As such, the comment's citation of the letter was accounted for in the analysis of the Draft EIR.

The project's impacts related to wildfire are discussed further in Section 4.19, Wildfire, of the Draft EIR. Notably, impacts were determined to be less than significant with mitigation incorporated, such as MM-FIRE-3, LACFD (Los Angeles County Fire Department) Plant Selection Guideline Compliant, which lists minimum distance from structures and plant guidance within Fuel Modification Zones. The City will enforce applicable standards during the plan check and permitting process. Given this, no change or addition to the environmental analysis included in the Draft EIR is required. The comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

03-11 The comment incorrectly states that the air quality and health effects on future residents living in a project next to a freeway were not addressed in the EIR. EIR Section 4.2.5 includes this very analysis under the subsection Freeway Health Risk Assessment. As discussed in Section 4.2.5, freeways and high-traffic roads are significant sources of TAC emissions. CARB recommends siting sensitive land

uses at least 500 feet away from such sources. As the proposed project would develop residential areas near the I-5 freeway, a HRA was conducted to disclose the potential risk to future occupants of the proposed project. The analysis incorporated traffic volumes and speeds for the I-5 freeway and ramps in the project vicinity obtained from the California Department of Transportation monitoring data. Following OEHHA Guidance (2015), the HRA assesses a 30-year residential exposure with age-specific sensitivities to account for early life exposure. The analysis spans 30 years from project buildout, defined by the period immediately following the earliest anticipated project completion. This represents the worst-case long-term exposure from the freeway sources as future vehicles implement cleaner technologies (natural gas, hybrid and electric vehicles) moving away from a dependence on diesel and gasoline fossil fuels. The analysis demonstrates the maximum impacts would be less than the significance thresholds and, impacts would be less than significant. No further action is required.

03-12 The comment presents a generalized traffic noise exposure level at a distance of 50 feet from a highway, which appears to be sourced from a Federal Highway Administration Public Roads publication article (Living With Noise July/August 2003), and suggests the project be reduced in scale to shift proposed land uses further from I-5 to avoid traffic noise impacts on future project residents.

The CEQA Guidelines do not consider community noise level effects *upon* a proposed project. Consequently, Section 4.12, Noise, of the Draft EIR did not analyze the exposure of future project residents to traffic noise levels associated with Interstate 5 (I-5) adjacent to the project.

The closest buildings of the project that would house residents are not closer than 75 feet from the closest edge of the closest travel lane of I-5. The range of 70-80 dBA at 50 feet from a highway referenced by the commenter would be reduced to 68-78 dBA at 75 feet from the highway (the location of the closest residential buildings). In addition, Figure 3-4b (Tentative Tract Map) of the Draft EIR indicates the incorporation of a 5-foot earthen berm topped by a 5-foot high noise barrier along the project property line fronting I-5. The combination berm and barrier of 10-feet in height above the freeway elevation would be expected to reduce exterior traffic noise exposure at the ground level of the project by a minimum of 11 dBA, resulting in residual traffic noise exposure for outdoor activities of 57-67 dBA, which would not be loud enough to interrupt conversation or other recreation activities.

The outdoor to indoor attenuation of contemporary commercial buildings including multi-family structures, assisted living facilities, and memory care units can effectively reach up to 35 dBA using widely available construction materials and door/window assemblies. With exterior noise exposure for future buildings facing I-5 not greater than approximately 78 dBA (for upper building levels not protected by the ground-level noise barrier) residual noise exposure levels less than 45 dBA should be feasible. Consequently, there should not be a need to move proposed residential building structures further from I-5 than currently proposed.

03-13 The EIR correctly evaluates GHG Threshold 2, "Consistency with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs" as it includes not only the CAP consistency analysis discussed in the comment, but also includes consistency analysis that is provided and describes the project's compliance with relevant regulations and the goals and strategies outlined in the applicable portions of the 2022 Climate Change Scoping Plan, SCAG 2020–2045 RTP/SCS, City of Santa Clarita General Plan and the City of Santa Clarita CAP. As discussed in the EIR Section 4.7, the consistency analysis presented demonstrates that the project is consistent with or would not conflict with the plans, policies, regulations, and GHG reduction action/strategies outlined in the 2022, 2014,

and 2017 Scoping Plans, 2020–2045 RTP/SCS, the Santa Clarita General Plan, and Santa Clarita Green Building Standards Code. Since the project is consistent and does not conflict with these plans, policies, and regulations, the project's incremental increase in GHG emissions would not result in a significant impact on the environment. Therefore, project impacts related to consistency with plans, policies and regulations are less than significant, and no mitigation is required. The comment incorrectly suggests that several sources of GHGs were left out of the analysis including the additional impervious area and removal of four oak trees. As estimated in Section 4.7, Greenhouse Gas Emissions, of the Draft EIR, and associated appendices, construction GHG emissions includes demolition, foundations/concrete pour and paving activities. As discussed above, GHG emissions were determined to be less than significant and no mitigation is required. Nevertheless, loss of existing vegetation at the site would be made up with project included 5 acres of green belt open space, and 2.9 acres of undeveloped open space. Additionally, per Chapter 17.51 of the Santa Clarita Municipal Code (SCMC), the project's landscape design would be required to emphasize drought-tolerant and/or native species. No further action is required.

03-14 The comment refers to the SCV Water Agency's Water Supply Assessment Cover Letter which includes recommendations for the project to include LID features and mimic undeveloped stormwater runoff rates and volumes. The comment also asks about the potential impacts to groundwater recharge as a result of the proposed development and recommends that more of the floodplain be left in its natural state and that "open pavers" be used to reduce heat generation, claiming that these issues were not discussed in the Draft EIR. As stated in the Draft EIR on page 4.9-14, all proposed improvements would be designed and constructed in accordance with the County's LID Manual requirements as required by the City. For example, the proposed drainage plan includes the construction of a biofiltration basin which would provide for water quality treatment and onsite infiltration to recharge local groundwater. As stated on page 4.9-16 of the Draft EIR, "per the LID Standards Manual, the project's BMPs would retain 100% of the design storm on site through a combination of infiltration and evapotranspiration" with a net result of no change in discharges offsite from pre-development conditions. The issue of changes to groundwater levels is addressed in Impact HYD-2 on page 4.9-15 which concludes that the adherence to the City drainage control requirements and the 3 drainage detention basins, the proposed project would have a less than significant change in groundwater recharge. Obtaining a Letter of Map Revision (LOMR) from FEMA, as discussed on page 4.9-16, would ensure that the project site improvements including grading and/or bank improvements to the South Fork of the Santa Clara River do not cause adverse impacts to the hydrology and hydraulics of the receiving waters. The use of open pavers or permeable pavement is an example of an LID feature that can be incorporated into project design development but are not the only operational drainage feature required to meet the County's LID Manual. The proposed project would be consistent with the LID Manual and all City drainage control requirements.

03-15 The comment is about wildlife corridor and protection of the natural streambed. The comment states that Wiley Creek (South Fork of the Santa Clara River) as being an important component of wildlife movement in the area. As stated in section 4.3.1.2 of the Draft EIR, the project site does not represent significant corridors for wildlife movement to and from adjacent sites; however, it did recognize that the South Fork of the Santa Clara River onsite is a regional wildlife movement corridor and it does state that a majority of this area would be maintained and the project proposes to widen the existing channel to create additional riparian habitat. The river is a concrete sided and bottomed channel in the northern portion of the project site upstream and that condition continues downstream of the project for

approximately 1.6 miles. As for the culvert beneath Interstate 5, the culvert is approximately 665 feet in length and is beneath a highly used roadway. The culvert begins on the upstream end from a concrete-sided and bottomed channel that continues for 2,000 feet to the south (upstream) and is adjacent to Interstate 5, the Calgrove Boulevard on- and off-ramps, and commercial businesses that are fenced. The Calgrove Boulevard underpass beneath Interstate 5 would be expected to support more larger, terrestrial wildlife movement from east to west due to its height and width, while avoiding the exposure of the concrete channel.

Additionally, the comment states that the California Endangered Species Act-listed species Swainson's hawk (*Buteo swainsoni*) occurs on the project site and incorrectly includes a photograph of a red-tailed hawk (*Buteo jamaicensis*) as proof. The project site is well outside of the current range of breeding by the species (the Antelope Valley has the closest known recent active nests). However, the species is likely a transient through the airspace above the project site during migration.

03-16 The comment represents a statement summarizing the comments included in Comment Letter 03. No change or addition to the environmental analysis included in the Draft EIR is required. The comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

03-17 This comment represents a letter by the Santa Clarita Valley Water Agency dated July 7, 2022, which is included as part of Appendix L to the Draft EIR. Given that this letter is part of the Draft EIR, no response is required.

03-18 The comment represents a letter from SCOPE dated April 28, 2022. This comment was provided during the scoping period for the proposed project, summarized in Chapter 2, Introduction, of the Draft EIR, and included in Appendix A to the Draft EIR. Appendix A to the Draft EIR includes the NOP, as well as materials and comments provided during the project's Scoping Meeting. However, Appendix A erroneously omitted the comments provided during the NOP public review/scoping period. As such, the comment letters are included within Chapter 3, Changes to the Draft EIR, and appended to this Final EIR. Although the comment letters were not appended to the Draft EIR, Chapter 2, Introduction, provides a summary of the CEQA process, including discussion that the City received approximately 50 comment letters from agencies, organizations, and individuals. These comments informed the City's environmental review of the proposed project, as presented throughout the Draft EIR. Therefore, this addition does not change the impact conclusions in the Draft EIR, nor do they result in any new significant impacts or the need for new or altered mitigation measures. Rather, providing the comment letters within the Final EIR merely augments the discussion already presented in the Draft EIR, and results in no change to the conclusions or mitigation measures previously presented. As such, a new significant impact would not occur nor would an increase in the severity of a previously identified significant impact would as a result. Therefore, this erratum does not warrant recirculation of the Draft EIR.

03-19 The comment represents an email exchange between SCOPE and the City regarding a Public Records Act request. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

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Response to Comment Letter O4

Western States Regional Council of Carpenters
Mitchell M. Tsai Law Firm
Hind Baki, Paralegal
April 15, 2024

O4-1 The comment notes the attached letter, included as Comment O4-2 through O4-23. See Responses to Comments O4-2 through O4-23 for more discussion. No further response is required.

O4-2 The comment describes the Western Carpenters union and identifies components of the proposed project. The comment correctly summarizes the proposed project's components. Overall, this comment is similar to Comment O2-2, which was prepared by the Western Carpenters. See Response to Comment O2-2.

O4-3 The comment states the City should require the project to be built with trained local workers. This comment is similar to Comment O2-3. See Response to Comment O2-3. No further response is required.

O4-4 The comment states local hire provisions would reduce vehicle trips, greenhouse gas emissions, and VMT, as well as provide local economic benefits. This comment is similar to Comment O2-3. See Response to Comment O2-3. No further response is required.

O4-5 The comment notes the State passed the Affordable Housing and High Road Jobs Act of 2022 (also known as Assembly Bill 2022). This comment is similar to Comment O2-3. See Response to Comment O2-3. No further response is required.

O4-6 This comment is similar to Comment O4-4. See Response to Comment O4-4. No further response is required.

O4-7 The comment raises concern for the potential of COVID-19 during construction activities and recommends additional requirements to reduce public health risks. The comment includes requested construction site design requirements, testing procedures, and safety planning requirements. This comment is similar to Comment O2-4. See Response to Comment O2-4. No further response is required.

O4-8 The comment states the intent of the California Environmental Quality Act. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

O4-9 The comment cites the CEQA Guidelines and case law related to environmental impact disclosure, mitigation, and technical studies. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

O4-10 The comment cites the CEQA Guidelines and case law related to environmental impact disclosure and public review. Moreover, the comment states the requirements for recirculation of an EIR. The comment states the following comments (Comments O4-11 through O4-21) warrant recirculation of the Draft EIR.

See Response to Comments O4-11 through O4-21 for more discussion. This comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

O4-11 The comment states the Draft EIR must describe all feasible mitigation measures to reduce the project's significant and unavoidable impacts. As described in Section 5.2, Significant and Unavoidable Environmental Effects, of the Draft EIR, implementation of the project would result in significant construction-related noise impacts due to an exceedance in noise standards. Impacts were determined to be significant and unavoidable even with the incorporation of mitigation measures MM-NOI-1 and MM-NOI-2, which would limit construction equipment within 200 feet of the northern and eastern boundary of the project site, in addition to construction barriers during such activities. The analysis and conclusions of the noise impact analysis, further detailed in Section 4.12, Noise, of the Draft EIR, were supported by the Noise and Vibration Impact Study, which is included as Appendix J to the Draft EIR. Moreover, the Draft EIR includes analysis of Alternative 4, Construction Noise Setback Alternative, which would redesign the proposed project with a 200-foot open space/landscaped buffer, among other components. As a result, Alternative 4 would eliminate the significant and unavoidable impact related to construction noise. Therefore, the Draft EIR as written adequately addresses this comment. No changes to the analyses in the Draft EIR are required as a result of this comment.

Additionally, this comment is similar to Comment O4-12, below. For more discussion, see Response to Comment O4-12.

O4-12 The comment states the DEIR fails to engage in sufficient analysis and examination of available mitigation measures to minimize significant and unavoidable construction noise impacts, rendering the DEIR legally deficient. The comment acknowledges the inclusion of two construction noise mitigation measures and correctly concludes these measures would not reduce construction noise levels to less than significant. The commenter then asserts that the DEIR must consider additional mitigation measures that are commonly deployed to reduce construction noise levels at surrounding sensitive receivers and presents a total of 8 such mitigation examples.

For this discussion, it is important to reiterate the conclusion of the DEIR "the project's temporary construction noise levels would be considered significant and unavoidable" (DEIR Pg. 4.12-22). This means that there are not feasible mitigation measures available that would reduce the identified impacts to a level of less than significant. The DEIR discusses the factors resulting in elevated construction noise levels at existing nearby sensitive receivers (DEIR pp. 4.12-13-4.12-15), including separation distances between construction equipment and adjacent residences as short as 50 feet; large scale/high intensity building construction (the senior living facility); and relatively low ambient noise levels at some of the sensitive receivers. With a construction noise significance threshold of 5 dBA L_{eq} over ambient, and existing ambient noise levels as low as 58 dBA at some receivers, predicted peak construction noise levels would exceed ambient by up to 30 dBA $L_{eq.}$ (DEIR Pg. 4.12-15). Even the most aggressive suite of construction noise control measures (i.e., mufflers, sound barriers, limited number of simultaneous equipment operations, etc.) would not decrease construction noise levels by 30 dBA L_{eq} at the closest neighboring residences. The DEIR therefore accurately concludes that construction noise impacts at the closest sensitive receivers would be significant and unavoidable. As discussed in Response to Comment O4-11, a project alternative (Alternative 4) is the only means for reducing construction noise impacts to less than significant, and this would not be considered a mitigation measure.

The DEIR includes not only two mitigation measures designed to reduce construction noise at nearby sensitive receivers (MM-NOI-1 and MM-NOI-2) but also one Project Design Feature (PDF-NOI-1); the commenter evidently overlooked PDF-NOI-1). PDF-NOI-1, MM-NOI-1 and MM-NOI-2 are presented below for reference, after which the commenter's example additional mitigation measures are listed and discussed.

PDF-NOI-1 Before the Building Official issues grading permits, the applicant must incorporate the following measures as a note on the grading plan cover sheet to ensure that the greatest distance between noise sources and sensitive receptors during construction activities have been achieved.

- Construction equipment, fixed or mobile, must be equipped with properly operating and maintained noise mufflers consistent with manufacturers' standards.
- Construction staging areas must be located away from off-site sensitive uses during project construction.
- The project contractor must place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the project site, whenever feasible.

MM-NOI-1 Construction equipment within 200 feet of the northern and eastern boundary of the project site is limited to small, reduced noise equipment that has a maximum noise generation level of 77 dBA Leq at 50 feet. This measure also applies to construction equipment during the later phases of construction for residential buildings within 200 feet of the Senior Living Building after it is occupied.

MM-NOI-2 Construction noise barriers must be installed with sufficient height to block the line-of-sight between the project construction area and adjacent sensitive receivers, including proposed on-site residential uses that are completed and occupied while construction in other parts of the project site continues, are recommended during project construction.

Commenter Suggested (CS) Construction Noise Mitigations

1) Constructing temporary noise barriers along the perimeter of the site in all areas of the property abutting sensitive residential receptors;
2) Routing heavily loaded trucks and truck traffic away from residential streets and areas;
3) Implementing noise-deadening measures for truck loading and operations;
4) Siting construction equipment on the project site as far away from sensitive receptors as possible;
5) Construction of walled enclosures around especially noisy construction activities and/or clusters or noisy equipment.
6) Combining the performance of noisy operations so they occur in the time period to reduce the duration of substantial construction noise;
7) Avoiding impact pile driving wherever possible in construction; or
8) Minimizing use of generators to power equipment.

Temporary noise barriers between construction activity and adjacent sensitive receivers (CS1 and CS5) are already required by MM-NOI-1. Wiley Canyon Road is aligned along the project site's eastern boundary and would provide direct access for construction-related heavy trucks to the site during construction (**e**). Wiley Canyon Road connects to Calgrove Blvd. just south of the project site, Calgrove

Blvd. is equipped with access ramps at I-5 in the north and south directions. Consequently, there would be no logical need to direct construction-related heavy truck trips away from residential neighborhoods for this project. Also, residences along the east side of Wiley Canyon Road are currently protected from traffic noise exposure along Wiley Canyon Road by a concrete block wall at their rear-yard property lines. Noise deadening measures for heavy truck loading (such as a rubber lining in the truck bed) are not practical to address loading of earth materials during earth-work due to significant damage or wear from earth material loading (CS3). PDF-NOI-1 includes controls specified in CS4. Combining additional "noisy operations" to occur all at the same time (CS6) would only exacerbate construction noise exposure levels at nearby sensitive receivers, and in many cases would not be feasible given the sequencing of tasks in the overall construction process. The use of pile drivers and electrical generators on the site would be dependent upon soil conditions and the availability of sufficient electrical power at the site (CS7 and CS8).

CEQA does not require an exhaustive analysis of available mitigation measures to conclude that a given impact would be significant and unavoidable, the magnitude of the impact in comparison to the reduction necessary to achieve a less than significant impact level is sufficient to support a finding of unavoidable and significant. The commenter provides no evidence that their suggested mitigations that are not already included in PDF-NOI-1, MM-NOI-1 and MM-NOI-2 would reduce construction noise impacts to less than significant.

04-13 The commenter is concerned that the mitigation as written with the language "where available in the Los Angeles region" results in a measure that is not complete and is inadequate. As such, a revision has been made. The revised language provides more specification on when Tier 4 Final engines may be offset by other means and assures emission reductions from the intended mitigation are met. These revisions do not change the impact conclusions in the Draft EIR, nor do they result in any new significant impacts or the need for new or altered mitigation measures. Rather, the revisions reflected in the Final EIR merely augment the discussion already presented in the Draft EIR, and result in no change to the conclusions or mitigation measures previously presented. No new significant impact would occur nor would an increase in the severity of a previously identified significant impact would as a result. Therefore, these changes do not warrant recirculation of the Draft EIR.

04-14 The comment states that the lower ratio (1:1) for habitat restoration required by MM-BIO-4 for impacts to sensitive vegetation communities should be equal to the 2:1 ratio required for aquatic resources restoration required by MM-BIO-5 for impacts to jurisdictional aquatic resources; otherwise, MM-BIO-4 is deficient. Sensitive vegetation communities are defined by their species component and the limited occurrences within California. As stated in Table 4.3-1 of the Draft EIR, the three sensitive vegetation communities impacted by the project have a State (S) rank of S3, which means the communities are vulnerable to extirpation or extinction, but not yet imperiled.[2] As such, 1:1 would provide for the replacement of the sensitive communities leading to a no-net loss of the resource. Jurisdictional aquatic resources are regulated by CDFW, United States Army Corps of Engineers (USACE), and the Regional Water Quality Control Board (RWQCB), which also have no-net loss policies. The jurisdictional aquatic resources on the project site consist of both the waters of the U.S. and streambed regulated by the three agencies and but also the associated riparian vegetation, regulated by CDFW, that is

[2] NatureServe. 2025. Definitions of NatureServe Conservation Status Ranks. Accessed August 2025. https://help.natureserve.org/biotics/content/record_management/Element_Files/Element_Tracking/ETRACK_Definitions_of_Heritage_Conservation_Status_Ranks.htm.

composed partially of the three sensitive vegetation communities. As such, the waters and the riparian vegetation combine to create a more valuable habitat than just the species within the communities, which warrants a higher ratio due to the value.

04-15 The comment states the project is inconsistent with the General Plan. The comment notes specific reasons are listed below, included as Comments 04-16 through 04-21. See Responses to Comments 04-16 through 04-21. No further response is required.

04-16 The comment notes the Draft EIR determined the project is partially consistent with Goal LU 3, which cites MM-AQ-1 would reduce air quality-related impacts. The comment asserts MM-AQ-1 is flawed. This comment is similar to Comment 04-13, above. See Response to Comment 04-13. No further response is required.

04-17 The comment asserts the project conflicts with General Plan Objective LU 6.1 regarding oak trees and rivers/streams. General Plan Objective LU 6.1 states "Maintain the natural beauty of the Santa Clarita Valley's hillsides, significant ridgelines, canyons, oak woodlands, rivers and streams." As detailed in Table 4.10-2, General Plan Land Use Consistency Analysis, the project would impact existing oak trees and protected waters and, thereby, effect the natural beauty of the Santa Clarita Valley. Given this, the project would be required to comply with the provisions in the City's Oak Tree Preservation Ordinance, which require oak tree replacements and protective fencing during construction. Compliance with these provisions of the Santa Clarita Municipal Code would result in less than significant impacts, as further detailed in Section 4.3, Biological Resources. Similarly, MM-BIO-4 is incorporated to reduce impacts to plant communities in riparian habitats, which would require restoration or enhancements at a ratio of no less than 1:1. In addition, MM-BIO-5 is incorporated to reduce impacts to the South Fork of the Santa Clara River, which would require restoration or enhancements at a ratio of at least 2:1 for permanent impacts and restoration of impacted areas to pre-project conditions for temporary impacts. Implementation of these mitigation measures would reduce impacts to a less-than-significant level. Additionally, the Draft EIR analyzes the project's potential impacts related to the natural beauty of the Santa Clarita Valley within Section 4.1, Aesthetics, in which impacts were found to be less than significant. Given the above, the Draft EIR's partially consistent determination remains adequate as the project's ability to maintain the natural beauty of the Santa Clarita Valley is achieved through code compliance and mitigation. No changes to the analyses in the Draft EIR are required as a result of this comment.

04-18 The comment claims the proposed project conflicts with the General Plan's Policy LU 7.3.5 because the project site is currently located within a Special Flood Hazard Area (SFHA) and thus should be considered in direct conflict with the General Plan policy. General Plan Policy LU 7.3.5 states that the City shall "Limit development within flood-prone areas to minimize downstream impacts." The proposed project would be required by Mitigation Measure HYD-1 to obtain a Letter of Map Revision (LOMR) before commencement of construction such that the project would then no longer be located in the SFHA. Therefore, considering that the policy only states that development should be limited and that before construction the project site would no longer be located within a SFHA, the conclusion of partially consistent is appropriate and justified. No changes to the analyses in the Draft EIR are required as a result of this comment.

04-19 The comment claims the proposed project conflicts with the General Plan's Policy LU 7.6 because specific design features to protect natural habitats are not mentioned. General Plan Policy LU 7.6

(protect natural habitats through site design where reasonable and feasible) As stated in the Draft EIR on page 4.3.1, the proposed project includes the redevelopment of an underutilized, previously disturbed site. Impacts to natural habitats would be reduced to a less-than-significant level through implementation of MM-BIO-1 through MM-BIO-5, as outlined in Section 4.3, Biological Resources, and also discussed above in Response to Comment O4-14. The project would be designed to retain several exiting natural features on the site to the extent feasible. For example, the project's design would avoid 22 on-site oak trees, and 2.9 acres of the project site would remain undeveloped open space. Therefore, the Draft EIR does include specific design features which are consistent with regulatory requirements (e.g., Clean Water Act Section 404 permit from the USACE, a Clean Water Act Section 401 permit from the RWQCB, and Streambed Alteration Agreement permit under Fish and Game Code Section 1602 from CDFW) and oversight by the overseeing agency (i.e., City, USACE,RWQCB, and/or CDFW). As a result, the conclusion of partially consistent is appropriate and justified and with implementation of the mitigation measures, a less than significant impact would occur. No changes to the analyses in the Draft EIR are required as a result of this comment.

O4-20 The comment asserts the project conflicts with General Plan Goal N1 given that Section 4.12, Noise, of the Draft EIR determined significant and unavoidable impacts would occur during construction. General Plan Goal N 1 states "A healthy and safe environment for Santa Clarita Valley residents, employees, and visitors." Similar to the discussion presented in Response to Comment O4-11, significant and unavoidable impacts would occur due to an exceedance in noise standards even with the incorporation of MM-NOI-1 and MM-NOI-2. As such, the project would affect the City's goal of a healthy and safe environment, regarding noise. However, construction-related impacts, as detailed in the Draft EIR's consistency analysis (see Table 4.10-2), would be temporary. Therefore, impacts would cease upon the completion of the project's proposed construction. Long-term operational noise would be regulated by the Santa Clarita Municipal Code and impacts would be less than significant, as detailed in Section 4.12. Moreover, as discussed in the consistency analysis contained in Section 4.10, Land Use and Planning, construction activities would be limited to 7 PM on weekdays and 6 PM on Saturday. This demonstrates the limited nature of the potential construction-related noise impacts. Moreover, the Draft EIR includes analysis of Alternative 4, Construction Noise Setback Alternative, which would redesign the proposed project with a 200-foot open space/landscaped buffer, among other components. As a result, Alternative 4 would eliminate the significant and unavoidable impact related to construction noise. Therefore, the Draft EIR as written adequately addresses this comment. No changes to the analyses in the Draft EIR are required as a result of this comment. However, the comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

O4-21 The comment asserts the project conflicts with General Plan Goal CO 3, which states "Conservation of biological resources and ecosystems, including sensitive habitats and species. As detailed in Table 4.10-2 and Section 4.3, of the Draft EIR, impacts to biological resources would be less than significant with the incorporation of MM-BIO-1 through MM-BIO-5. The comment further asserts the proposed mitigation are inadequate. This comment is similar to Comment O4-14. See Response to Comment O4-14. No further response is required.

O4-22 The comment represents a statement summarizing the comments included in Comment Letter O4. No change or addition to the environmental analysis included in the Draft EIR is required. The comment

will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

04-23 The comment represents a technical report, Local Hire Requirements and Considerations for Greenhouse Gas Modeling, prepared by Soil Water Air Protection Enterprise (SWAPE), which discusses local hire policies and GHG modeling. Comment O2-5 through O2-9. See Responses to Comment O2-5 through O2-9.

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Response to Comment Letter I1

Julie Krumrine
March 4, 2024

I1-1 The comment notes language contained in the Draft EIR refers to another project. The comment correctly identified an error in the Draft EIR. As such, a revision has been made. This addition does not change the impact conclusions in the Draft EIR, nor do they result in any new significant impacts or the need for new or altered mitigation measures. Rather, the revision reflected in the Final EIR merely augments the discussion already presented in the Draft EIR, and results in no change to the conclusions or mitigation measures previously presented. As such, a new significant impact would not occur nor would an increase in the severity of a previously identified significant impact would as a result. Therefore, this erratum does not warrant recirculation of the Draft EIR.

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Response to Comment Letter I2

Annette Lucas
March 25, 2024

I2-1 The comment raises concern for the potential impacts related to the General Plan Circulation Element. As discussed in the Draft EIR, Wiley Canyon Road is designated by the General Plan as a Secondary Highway, which is a four-lane road configuration, along the project frontage. However, the proposed project improvements would maintain a two-lane roadway configuration. For more discussion regarding Wiley Canyon Road, see Topical Response No. 3 – Traffic and Circulation. Based on the projected future traffic volumes, including those generated by the proposed project, it is not anticipated that this segment of Wiley Canyon Road will require expansion to four lanes. The anticipated traffic volumes fall well within the maximum capacity of a two-lane roadway. As part of the proposed project, the dedication and acquisition of right-of-way mainly on the west side of Wiley Canyon Road (adjacent to project frontage) will be necessary for identified street improvements in the Traffic Study. Should the need for a four-lane roadway arise in the future, Wiley Canyon Road can be designed to accommodate four lanes using the right-of-way dedicated by this project, even at its narrowest section at 53 feet.

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Response to Comment Letter I3

Stephanie Correnti, RD
April 1, 2024

I3-1 The comment asserts the project is inconsistent with the General Plan Circulation Element. As discussed in the Draft EIR, Wiley Canyon Road is designated by the General Plan as a Secondary Highway, which is a four-lane road configuration, along the project frontage. However, the proposed project improvements would maintain a two-lane roadway configuration. For more discussion regarding Wiley Canyon Road, see Topical Response No. 3 – Traffic and Circulation. Based on the projected future traffic volumes, including those generated by the proposed project, it is not anticipated that this segment of Wiley Canyon Road will require expansion to four lanes. The anticipated traffic volumes fall well within the maximum capacity of a two-lane roadway. As part of the proposed project, the dedication and acquisition of right-of-way mainly on the west side of Wiley Canyon Road (adjacent to project frontage) will be necessary for identified street improvements in the Traffic Study. Should the need for a four-lane roadway arise in the future, Wiley Canyon Road can be designed to accommodate four lanes using the right-of-way dedicated by this project, even at its narrowest section at 53 feet.

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Response to Comment Letter I4

Lindi Busenbark
April 1, 2024

I4-1 The comment requests that a simulation be performed on the timing of emergency evacuation with all neighborhoods, including Oakridge Estates, The Oaks, Hidden Valley, Rancho LaSalle, Kelton Estates, the Mulberry mobile home park, Wiley Canyon Elementary School, and residents between east of Calgrove to Lyons. As depicted in Figure 4, Nearby Land Uses, of the Wildfire Evacuation Study (WES) (Appendix N of the Draft EIR), the study area identifies Areas A through E, which include The Oaks, Oakridge Estates, Hidden Valley, Rancho La Salle, and Mulberry mobile home park. Traffic associated with uses east of Calgrove all have independent access to Lyons Canyon via Apple Street, Valley Street, Wayman Street, Arcadia Street and would not rely on the same evacuation routes as the project. Similarly, Kelton Estates, which is immediately north of Area E (Figure 4, Nearby Land Uses of Appendix N, WES of the Draft EIR) has independent access to Lyons Canyon via Markel Drive to La Glorita Circle to Ave Dorena. As described in Appendix N, WES, of the Draft EIR, the study assumes a weekend evacuation when schools would not be in session; therefore, it was assumed that Wiley Canyon Elementary was closed and would not contribute to evacuation traffic.

The comment adds that to adequately simulate emergency access, all vehicles that will travel to Wiley Canyon Road or to Hawkbryn Avenue in an emergency should be evaluated. As described in Appendix N, WES, of the Draft EIR, to analyze a reasonable worst-case scenario, the modeling assumes all evacuating vehicles would use Wiley Canyon Road to more urban areas to the north, or south to Calgrove Boulevard to access I-5. If the model were to assume the use of Hawkbryn Avenue, overall evacuation times would reduce as roadway capacity would increase within the study area.

I4-2 The comment asks how the project will protect the children at Wiley Canyon Elementary against the dirt excavation dust. As discussed in detail in Section 4.2, Air Quality, of the Draft EIR, during its construction, the project must comply with CARB's requirements to minimize short-term emissions from on-road and off-road diesel equipment, and with SCAQMD's regulations such as Rule 403 for controlling fugitive dust and Rule 1113 for controlling VOC emissions from architectural coatings. Furthermore, the project would utilize construction contractors in compliance with California's on-road and off-road vehicle rules, including the ATCM that limits heavy-duty diesel motor vehicle idling to five minutes at any location (13 CCR Section 2485), the Truck and Bus regulation that reduces NOX, PM10, and PM2.5 emissions from existing diesel vehicles operating in California (13 CCR Section 2025) and the In-Use Off-Road Diesel Fueled Fleets regulation that reduces emissions by the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models (13 CCR Section 2449).

In addition, as presented in Section 4.2, a SCAQMD Localized Significance Threshold (LST) analysis was performed for the project to evaluate potential local impacts of construction. The localized construction air quality analysis was conducted using the methodology prescribed in the SCAQMD Final Localized Significance Threshold Methodology (June 2003, revised July 2008) (SCAQMD 2008a). As described by SCAQMD (https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds), LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that

pollutant for each source receptor area and distance to the nearest sensitive receptor. For PM10 LSTs were derived based on requirements in SCAQMD Rule 403 – Fugitive Dust. For the proposed project, the screening criteria provided in the Final Localized Significance Threshold Methodology were used to determine localized construction emissions thresholds for the project. The maximum daily localized emissions for each of the construction phases (including dirt excavation) and the localized significance thresholds are presented in EIR Table 4.2-8, Estimated Maximum Localized Construction Emissions. As shown in EIR Table 4.2-8, construction-related localized emissions would not exceed the SCAQMD localized significance thresholds for NOX, CO, PM10 and PM2.5 at the nearest sensitive receptors that are adjacent to the project site. Wiley Canyon Elementary school is ~ 2,000 feet and greater away from the project site and would have even lower LST impacts. No further action is required.

I4-3 The comment states that a new study needs to be done on each season of excavation. As discussed above the SCAQMD LST analysis provided in the EIR demonstrates that construction-related localized emissions would not exceed the SCAQMD localized significance thresholds for NO_X, CO, PM_{10} and $PM_{2.5}$ at the nearest sensitive receptors that are adjacent to the project site. Wiley Canyon Elementary school is ~ 2,000 feet and greater away from the project site and would have even lower LST impacts. No further action is required

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Response to Comment Letter I5

Annette Lucas
April 2, 2024

I5-1 The comment raises concerns related to Wiley Canyon Road. The comment states past planning efforts envisioned more lanes for the existing roadway. As discussed in the Draft EIR, Wiley Canyon Road is designated by the General Plan as a Secondary Highway, which is a four-lane road configuration, along the project frontage. However, the proposed project improvements would maintain a two-lane roadway configuration. For more discussion regarding Wiley Canyon Road, see Topical Response No. 3 – Traffic and Circulation. Based on the projected future traffic volumes, including those generated by the proposed project, it is not anticipated that this segment of Wiley Canyon Road will require expansion to four lanes. The anticipated traffic volumes fall well within the maximum capacity of a two-lane roadway. As part of the proposed project, the dedication and acquisition of right-of-way mainly on the west side of Wiley Canyon Road (adjacent to project frontage) will be necessary for identified street improvements in the Traffic Study. Should the need for a four-lane roadway arise in the future, Wiley Canyon Road can be designed to accommodate four lanes using the right-of-way dedicated by this project, even at its narrowest section at 53 feet.

Additionally, the comment states the proposed project does not improve traffic flow. CEQA Guidelines Section 15064.3 states that traffic delay using level of service (LOS) metric is no longer considered a significant environmental impact under CEQA. California law requires the use of a VMT metric for land use development projects. Nonetheless, a summary of project's traffic analysis using the LOS metric is provided in Appendix K-5, Traffic Analysis, of the Draft EIR, consistent with City requirements and for informational purposes. An operational analysis of intersections identified for the project's traffic study area and site access was conducted for existing and cumulative year traffic conditions under with and without project conditions. The City uses the criteria of LOS D to LOS E or F, or if an intersection is already operating at LOS D to determine the degradation caused by addition of project trips. As detailed in Appendix K-5, two intersections (I-5 Southbound at Calgrove Boulevard and I-5 Northbound at Calgrove Boulevard) would be significantly affected during the existing plus project condition, among others during the interim year cumulative scenario. As such, the project would construct or pay its fair-share towards improvements required to reduce operational deficiencies, including improvements to Wiley Canyon Road (Appendix K-5). These improvements would be included as conditions of approval for the project. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. However, the comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

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Response to Comment Letter I6

Judith Cantor
April 3, 2024

I6-1 The comment raises concerns regarding traffic in the regional vicinity of the project site. Additionally, the comment raises concern for impacts to schools and a local hospital. The comment notes another project and raises concerns for traffic impacts.

CEQA Guidelines Section 15064.3 states that traffic delay using LOS metric is no longer considered a significant environmental impact under CEQA. Nonetheless, a summary of project's traffic analysis using the LOS metric is provided in Appendix K-5, Traffic Analysis, of the Draft EIR for informational purposes. An operational analysis of intersections identified for the project's traffic study area and site access was conducted for existing and cumulative year traffic conditions under with and without project conditions. The analysis found intersections with potential deficiencies, as further detailed in Appendix K-5. As such, the project would construct or pay its fair-share towards improvements required to reduce operational deficiencies. These improvements would be included as conditions of approval for the project. Overall, the comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR.

Similarly, impacts to hospitals are not an identified environmental resource topic within the State or local CEQA guidelines. Moreover, the hospital mentioned, Henry Mayo Newhall Memorial Hospital, is not publicly owned and, therefore, not considered a public service. Impacts to schools; however, were analyzed within the Draft EIR under Section 4.14, Public Services, in which less than significant impacts would occur with the payment of fees as set forth in Government Code Section 65996. Nevertheless, the comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

I6-2 The comment raises concern for the proposed density on site and requested entitlements for the proposed project. As stated in the Section 4.10, Land Use and Planning, of the Draft EIR, Santa Clarita Municipal Code Section 17.35.020 specifies the Mixed Use – Neighborhood (MX-N) zone permits a maximum density of 18 units per gross acre (du/ac) and a minimum of 0.2 floor area ratio (FAR) for non-residential components. A Minor Use Permit is required given that the proposed commercial space would not meet the minimum zoning requirements for commercial FAR. The project's residential component would result in a density of approximately 12 du/ac[3], which is within the maximum zoning requirements. As such, with the approval of the proposed CUP and Minor Use Permit the project's proposed uses would be allowed under existing zoning for the project site.

Additionally, the comment raises concerns for the potential traffic as a result of the project as well as issues not related to the proposed project (i.e., Camp Scott). Regarding traffic, see Response to Comment I6-1 above. The other comments do not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. No further response is required.

[3] 379 units divided by 31.8-acre site = 11.9 du/ac or 12 du/ac

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Response to Comment Letter I7

Debra Poitevint, RN
April 3, 2024

I7-1 The comment raises concern for traffic-related effects on Wiley Canyon Road. CEQA Guidelines Section 15064.3 states that traffic delay using LOS metric is no longer considered a significant environmental impact under CEQA. Nonetheless, a summary of project's traffic analysis using the LOS metric is provided in Appendix K-5, Traffic Analysis, of the Draft EIR for informational purposes. An operational analysis of intersections identified for the project's traffic study area and site access was conducted for existing and cumulative year traffic conditions under with and without project conditions. The analysis found intersections with potential deficiencies, as further detailed in Appendix K-5. As such, the project would construct or pay its fair-share towards improvements required to reduce operational deficiencies. These improvements would be included as conditions of approval for the project.

Additionally, the comment raises concern for road safety as a result of the project. Although the comment is not specific in the safety concerns, the Draft EIR includes discussion regarding safety. As further detailed in Section 4.16, Transportation, the project would provide traffic calming features per City standards and City staff recommendations.

The comment also requests a reduced size. The Draft EIR analyzes alternatives to the proposed project. Notably, Alternative 4, Construction Noise Setback, would result in a development scale that is less than the proposed project. As such, this comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

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Response to Comment Letter I8

Julie Miller
April 5, 2024

I8-1 The comment notes an attached letter in support of a new medical facility or hospital in the Santa Clarita Valley. This comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I8-2 The comment states population growth has occurred, including daytime and nighttime population. The comment raises concern for the service capacity of the Henry Mayo Newhall Memorial Hospital with the addition of the proposed project. Impacts to hospitals are not an identified environmental resource topic within the State or local CEQA guidelines. Moreover, this hospital is not publicly owned and, therefore, not considered a public service. Furthermore, the project would not result in substantial unplanned population growth as the project's housing, population, and employment growth would be within growth projections for the Santa Clarita Valley. Given this, less than significant impacts would occur, as further detailed in Section 4.13, Population and Housing, of the Draft EIR. As such, this comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. No further response is required.

I8-3 The comment raises concern for the hospital's existing demand. Similar to Response to Comment I8-2, this comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. No further response is required.

I8-4 The comment raises concern for the potential emergency needs at the hospital as a result of a major earthquake. Overall, this comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. Nevertheless, this comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

For informational purposes, the Draft EIR analyzes potential impacts related to the environmental topic areas raised in the comment, including earthquakes, fire protection services, and emergency response planning. As demonstrated throughout the EIR, the project site is not located within or near an Alquist-Priolo Earthquake Fault Zone (Draft EIR, p. 4.6-9). Although the project site is located within an area of high seismic activity, the project would be required to comply with state and local building codes, which would ensure the new development is designed to include seismic safety measures. As such, implementation of the proposed project would not exacerbate existing seismic risk (Draft EIR, p. 4.6-10). Furthermore, the project would not significantly impact service ratios for fire protection and medical emergency services. While the project may result in an increase in demand, the project would not require the Los Angeles County Fire Department to increase its service area in order to serve the project site. Moreover, the project would be designed and constructed in accordance with all applicable provisions of state and local fire codes and the project applicant would be required to pay development fees established by the fire department (Draft EIR, p. 4.14-10). Regarding emergency planning, the project would not impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The City maintains the Hazards Mitigation Plan, which outlines several actions intended to facilitate emergency evacuation, agency coordination, and notification procedures (Draft EIR, pp. 4.8-11 and 4.8-12).

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Response to Comment Letter I9

Stephanie Correnti
April 6, 2024

I9-1 The comment raises concern with emergency access on the project site. The primary project entrance would be located at the northern end of the site and an emergency vehicle-only access would be provided by a driveway on Hawkbryn Avenue.

I9-2 The comment raises concern for wildfire evacuation plans and questions if the current two-lane configuration on Wiley Canyon Road was taken into account. As stated in Appendix N, Wildfire Evacuation Study (WES), of the Draft EIR, the model does have limitations and cannot account for every variable, such as how long it would take a resident with memory care issues to leave; however, as part of the licensing process, the proposed assisted and memory care facility would be required under Health and Safety Code section 1569.695 and California Code of Regulations, Title 22, Section 87212, Emergency Disaster Plan to prepare an emergency and disaster plan that includes how the facility would evacuate residents.

The comment further requests clarification on if the modeled evacuations were based on the current 2 lane Wiley Canyon, stating that the General Plan and OVOV require a 4-lane road before construction begins to allow more cars to quickly evacuate. As described in Appendix N, WES, of the Draft EIR, the evacuation model assumes the existing roadways plus project improvements. As described in Section 3.4.9.1, Project Description, Roadway Improvements and Access, of the Draft EIR, improvements along Wiley Canyon Road in the vicinity of the project frontage would include a Class I bike path and walking trail on the west side of Wiley Canyon Road and bus bays from the northern boundary of the project site to Calgrove Boulevard.

As explained in Section 4.16.5 of the EIR, the project will have a less than significant impact with regard to potential conflicts with OVOV goals and policies. The Circulation Element of OVOV includes goals, objectives and policies pertaining to circulation within the Santa Clarita planning area, which includes the project site. Accordingly, the project would not conflict with or impede implementation of any applicable policies within the OVOV and would result in a less than significant impact. Additionally, as described in the Land Use Element, regarding Calgrove Corridor/Smiser Ranch, “those constraints include oak trees, Caltrans right-of-way dedication, the future widening of Wiley Canyon Road to four lanes, electrical easements, and drainage.” However, there is nothing in the OVOV, that specifically states the widening must be completed before development of the project site. The commenter is correct in the assertion that additional lanes along Wiley Canyon would provide additional capacity and reduce overall evacuation times.

I9-3 The comment raises concern for on-street parking along Hawkbryn Avenue in the event of an evacuation. Hawkbryn Avenue is proposed as a secondary emergency access that would be limited to emergency vehicles, and would be at the discretion of law enforcement or fire to allow private vehicle access during an emergency event. As described in Section 4.3 of the Wildfire Evacuation Study (WES) (Appendix N of the Draft EIR), this analysis assumes that traffic evacuating from the Project and nearby communities would use Wiley Canyon Road to travel north to more urbanized, fire-safe areas, or access I-5 via Calgrove Boulevard to leave the area. This assumption selects a reasonable evacuation route for the assumed extreme weather scenario and a fire traveling in a north/northeast direction.

Additionally, in regard to parking along Hawkbryn, in the absence of designated parking areas, it is not within the purview of the project applicant to provide parking for the existing Mulberry mobile home park.

I9-4 The comment requests parking to be prohibited on Hawkbryn Avenue and Wabuska Street for emergency purposes. Parking is not an environmental topic area that is addressed under CEQA thresholds. Moreover, the project applicant does not control the properties to the north of the project site in order to enforce parking management for the Mulberry Mobile Home Park. Given this, the comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. Nevertheless, this comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR. See Topical Response No. 1 – Parking Plan for more discussion.

I9-5 The comment raises concern for the Sheriff's Department service ratios during an emergency. Section 4.14, Public Services, of the Draft EIR analyzes the project's potential to impact existing service ratios. Impacts were found to be less than significant with the payment of law enforcement facilities fees pursuant to Section 17.51.01B of the Santa Clarita Municipal Code. Although the project would result in an increase in demand for police protection services, the Draft EIR analyzes the project's potential impacts relative to wildfire events. Evacuation modeling was performed and determined the project's impact would be less than significant with the incorporation of design and circulatory improvements. For more information regarding evacuation, see Appendix N, Wildfire Evacuation Plan, of the Draft EIR.

I9-6 This comment is comprised of photographs of on-street parking along Hawkbryn Avenue and Wabuska Street. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. No response is required.

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Response to Comment Letter I10

Stephanie Correnti
April 6, 2024

I10-1 The comment cites an attached video of vehicles parked on Hawkbryn Avenue. While comment letter does not contain a video, a photograph of vehicles parked on Hawkbryn Avenue is available. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. This comment is similar to Comment I9. See Response to Comment Letter I9.

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Response to Comment Letter I11

Carla Cervantes
April 8, 2024

I11-1 This comment is about the special-status bat species that have potential to occur and the lack of focused surveys for them. The seven bats species that were analyzed for the potential to occur in Appendix C of Appendix C-1 of the Draft EIR and not expected to occur due to the lack of the typical foraging habitat and/or roosting elements required. Additionally, the project site lacks roosting elements that would support large maternity roosts that are analyzed under Threshold BIO-4 of Section 4.3, Biological Resources, of the Draft EIR. While individuals of the analyzed bat species may roost in the trees or eaves of the existing structures, none of the species are listed under the state or federal endangered species acts, so the loss of an individual of those species does not rise to a level of significance, since the loss would not cause the species' population to drop below self-sustaining levels.

I11-2 This comment asks how Crotch's bumble bee will be addressed by the project since it is a candidate for listing under the California Endangered Species Act and it is afforded the protection of the act. MM-BIO-1 of the Draft EIR provides for protocol surveys to determine the presence or absence of the species and provides actions and mitigations to sufficiently address any impacts in order to reduce those impacts to less than significant.

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Response to Comment Letter I12

Annette Lucas
April 8, 2024

I12-1 The comment appears to describe project information regarding the Henry Mayo Newhall Hospital Master Plan. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no response is required.

I12-2 The comment raises concerns for the hospital capacity to serve the project's senior residents. The project proposes a senior living facility that includes memory care and other supporting amenities for basic-needs nursing care on site. In addition, the project would include assisted living units and independent living units, which comprises of the majority of the senior living provided on site. As further detailed in Chapter 3, Project Description, of the Draft EIR, the project would include transportation improvements along Wiley Canyon Road, which are identified as means to address traffic congestion. See Appendix K-5, Traffic Analysis, which outlines the conditions of approval necessary to reduce operational deficiencies on Wiley Canyon Road. No change or addition to the project or environment analysis is required as a result of this comment.

I12-3 The comment raises concern for hospital capacity as a result of the proposed project. This comment is similar to Comment I12-2. See Response to Comment I12-3. Additionally, the project would not result in substantial unplanned population growth as the project's housing, population, and employment growth would be within growth projections for the Santa Clarita Valley. Given this, less than significant impacts would occur, as further detailed in Section 4.13, Population and Housing, of the Draft EIR. Furthermore, the project would not significantly impact service ratios for fire protection and medical emergency services. While the project may result in an increase in demand, the project would not require the LACFD to increase its service area in order to serve the project site. The project would be designed and constructed in accordance with all applicable provisions of state and local fire codes and the project applicant would be required to pay development fees established by the fire department (Draft EIR, p. 4.14-10).

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Response to Comment Letter I13

Pam Jenner
April 9, 2024

I13-1 The comment expresses opposition to the proposed project. This comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR. The comment also raises concern for emergency planning, as further detailed in Comments I13-3 and I13-4 below. See Responses to Comments I13-3 and I13-4.

I13-2 The comment expresses opposition to the proposed project. This comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR. No further response is required.

I13-3 The comment expresses objection to the proposed roundabouts on Wiley Canyon Road and raises concern for fire protection services utilizing the road with the turning radius. The project's proposed plans, including the off-site improvements to Wiley Canyon Road have been reviewed by the Los Angeles County Fire Department. In addition, the plan set has and will continue to undergo review from the City's planning department during the plan check and permitting process. This process is necessary for compliance with applicable codes and regulations, including fire codes and street safety standards. As demonstrated throughout the Draft EIR, the project's proposed improvements to Wiley Canyon Road have been analyzed against applicable thresholds of significance. Notably, these improvements were identified as means to address traffic congestion. See Appendix K-5, Traffic Analysis, which outlines the conditions of approval necessary to reduce operational deficiencies on Wiley Canyon Road. No change or addition to the project or environment analysis is required as a result of this comment.

The comment also expresses support for a traffic signal at Calgrove Boulevard and Wiley Canyon Road as well as Wiley Canyon Road and the project's entrance. This comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

I13-4 The comment raises concern for the proposed emergency access on Hawkbryn Avenue and existing on-street parking. As it relates to vehicle access to the site, there is one access point to the project site along Wiley Canyon Road. A secondary access is not required from a traffic circulation perspective. The Los Angeles County Fire Department does require a secondary access for emergency service only, which is provided to Hawkbryn Avenue. The Hawkbryn Avenue access would be gated with a Fire Department knox box or similar device. This gate would not provide pedestrian access or any non-emergency vehicle access. As a result, there is little expectation that parking associated with the project would occur on Hawkbryn Avenue because there is no direct pedestrian access at this location. The project's proposed plans would adhere to all emergency ingress and egress requirements in accordance with building code and fire code requirements. Given that the Draft EIR considers emergency ingress/egress on site and impacts related to emergency access are considered less than significant, no changes to the analyses in the Draft EIR are required as a result of this comment.

I13-5 The comment raises concerns for the existing conditions of Hawkbryn Avenue. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. No response is required.

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Response to Comment Letter I14

Annette Lucas
April 10, 2024

I14-1 The comment is an introductory statement. No response is required.

I14-2 The comment inquires about whether the City provided notification for changes to Wiley Canyon Road. The proposed project includes changes to Wiley Canyon Road, which was noticed in the Notice of Preparation on March 24, 2022, to public agencies, organizations, and interested individuals. A scoping meeting was held on April 14, 2022, at Santa Clarita City Hall. In addition, the Draft EIR was released for public review on March 1, 2024, for a 45-day public review period ending on April 15, 2024.

Regarding planned improvements for Wiley Canyon Road. As discussed in the Draft EIR, Wiley Canyon Road is designated by the General Plan as a Secondary Highway, which is a four-lane road configuration, along the project frontage. However, the proposed project improvements would maintain a two-lane roadway configuration. For more discussion regarding traffic and circulation, see Topical Response No. 3 – Traffic and Circulation. Based on the projected future traffic volumes, including those generated by the proposed project, it is not anticipated that this segment of Wiley Canyon Road will require expansion to four lanes. The anticipated traffic volumes fall well within the maximum capacity of a two-lane roadway. As part of the proposed project, the dedication and acquisition of right-of-way mainly on the west side of Wiley Canyon Road (adjacent to project frontage) will be necessary for identified street improvements in the Traffic Study. Should the need for a four-lane roadway arise in the future, Wiley Canyon Road can be designed to accommodate four lanes using the right-of-way dedicated by this project, even at its narrowest section at 53 feet.

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Response to Comment Letter I15

Judd Figatner
April 11, 2024

I15-1 The comment expresses general opposition to the proposed project. This comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

I15-2 The comment provides a summary of the contents presented in Section 4.6, Geology and Soils, of the Draft EIR, and Appendix E, Geotechnical Report. The comment also raises concerns for the analysis contained within the Draft EIR. Specifically, the comment states the Draft EIR does not include discussion regarding surface rupture within the project site's local vicinity. As detailed in Appendix E, Geotechnical Report, the project site was evaluated by a California licensed Engineering Geologist and Geotechnical Engineer to determine the geotechnical conditions and hazards present in accordance with standard geotechnical engineering practices and in accordance with building code requirements. As stated on page 18 of the geotechnical report, the proposed development "is feasible for development from a geologic and geotechnical standpoint, provided that the recommendations presented in our reports are followed and implemented during design and construction." The site preparations that are recommended in the geotechnical report (e.g., removal of loose surface soils and replacement with compacted fills) combined with the foundation design measures would be incorporated into the project design plans in accordance with current building code requirements. As a result, the presence of alluvial gravel, sand and clay as well as loose sands and soft silts would not preclude safe construction of the proposed structures as the stringent building code requirements would ensure protection of future occupants and resiliency of the structures in static and dynamic (i.e., earthquake) conditions. As far as surface fault rupture concerns, in accordance with the Alquist-Priolo Earthquake Fault Zoning Act, the California Geologic Survey considers surface fault rupture hazards to be primarily within limited areas (approximately 200 to 500 feet on either side of) around faults with direct evidence of displacement in the last 11,700 years, known as a Holocene-active fault. There are no Holocene-active faults that are in close proximity of the project site. The nearest Holocene-active fault is 0.4 miles from the project site. The presence of other fault rupture events, such as the commenter's reference to one 2 miles from the project site, has no bearing on the determination of the surface fault rupture hazard. The comment also indicates a concern with the relationship of depth of recompacted fill to the height of the buildings and expanse of the sediment. All the recommendations for site preparations at the project site including depth of fill, compaction standards, and foundation design would be consistent with current building code requirements that are based on established geotechnical engineering practices which are more involved than just the ratio of building height to compacted fill depth. The adherence to current building code requirements would ensure that the proposed structures are constructed to protect future occupants from significant injury and the structure from significant damage. Impact would be less than significant.

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Response to Comment Letter I16

Julie and Jeff Ford
April 10, 2024

I16-1 The comment raises concern for air quality and noise impacts related to the nearby I-5 freeway. The Draft EIR discloses the existing environmental conditions related to air quality and noise within Section 4.2, Air Quality, and Section 4.12, Noise, of the Draft EIR. However, CEQA generally requires analysis of the effects of a project on the environment (CEQA Guidelines Section 15126.2), as opposed to the environment's effects on a project (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369). Regarding air quality, however, a Health Risk Assessment (Appendix B to the Draft EIR) was prepared given the proximity of the project to the freeway. The analysis determined the maximum calculated cancer risk would be reduced to a less-than-significant level in accordance with California Code of Regulations Title 24 standards requiring the installation of window filters (Draft EIR, p. 4.2-39). Regarding operational noise, impacts related to off-site traffic noise as a result of the project were determined to be less than significant.

The comment also raises concern for the proposed scale of the project when compared to the surrounding community. Impacts related to the project's aesthetic consistency is detailed in Section 4.1, Aesthetics, of the Draft EIR. Impacts were determined to be less than significant. Similarly, as detailed in Section 4.10, Land Use and Planning, the project as proposed is consistent with the site's land use and zoning designations.

The comment asserts the project would result in more significant and unavoidable impacts. Significant impacts were identified throughout the Draft EIR; however, with the incorporation of feasible mitigation measures, impacts were reduced to a less-than-significant level. The comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I16-2 This comment summarizes the proposed project description. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I16-3 The comment expresses opposition to the proposed project and asserts potentially significant impacts would occur under the following environmental topic areas: Aesthetics, Air Quality, Biological Resources, Land Use and Planning, Noise, Public Services, Transportation, and Utilities and Service Systems. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required. However, the comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

I16-4 The comment asserts the Draft EIR does not analyze the off-site improvements. Chapter 3, Project Description, of the Draft EIR, identifies the proposed off-site improvements, including those planned for Wiley Canyon Road. The analysis contained within the Draft EIR includes construction assumptions encompassing the construction and operational effects of all components of the project. Moreover, the alternatives analysis contained in the Draft EIR included changes to the project site's design and land use. All alternatives considered included the planned off-site improvements identified in the proposed

project. The comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I16-5 The comment raises concern for the cumulative projects list. The Draft EIR utilized a list of related projects identified in Appendix K, Traffic Impact Analysis. This list represents projects in the nearby area that were anticipated to be built in the next seven years (Appendix K-5, p. 2.6). The technical analysis was prepared in July 2022, after the start of the environmental process (NOP was released on March 24, 2022). Moreover, the environmental analysis contained in the Draft EIR relies on the baseline existing conditions at the time of publishing the NOP, in accordance with CEQA Guidelines Section 15125(a).

I16-6 The comment asserts the alternatives analysis does not provide a reasonable range of alternatives. In addition, the comment raises concern for the environmental superior alternative (Alternative 4, Construction Noise Setback Alternative) given that it partially meets the first project objective, "Create a new mixed-use community that allows for residential, retail/commercial, and senior housing while preserving and enhancing natural resources." This comment is similar to Comment I16-10. See Response to Comment I16-10.

Regarding a reasonable range of alternatives, the Draft EIR includes discussion on alternatives considered but rejected. For example, an alternative site was considered but rejected given that the project applicant does not control another site within the area of comparable land that is available for development of the project. Additionally, as stated in CEQA Guidelines Section 15126.6(f)(2)(A), the key question and first step in analyzing alternative sites is whether any of the significant effects of a project would be avoided or substantially lessened by putting that project in another location. Only locations that would avoid or substantially lessen any of the significant effects of a project need to be considered in the EIR. The project would result in significant and unavoidable impacts related to construction noise, which is tied to the project's proposed senior living component. Similarly, Alternative 4 proposes a 200-foot construction noise setback, which would reduce the proposed senior living facility's scope and remove the project's proposed commercial component. The comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. No changes to content or analyses in the Draft EIR are required as a result of this comment.

I16-7 The comment raises concern for impacts related to air quality and noise on site. This comment is similar to Comment I16-1. See Response to Comment I16-1. For more information on the potential health impacts as a result of the project, see the Health Risk Assessment included as Appendix B to the Draft EIR.

In addition, the comment requests air quality sampling. An Air Quality Technical Report was prepared for the proposed project and included as Appendix B to the Draft EIR. Sampling of existing conditions was not performed on site; however, instead, air quality analyses are conducted with modeling software (i.e., California Emissions Estimator Model [CalEEMod]). This method is in accordance with guidance from the South Coast Air Quality Management District (SCAQMD). Moreover, measuring criteria air pollutants is based on the regional context of within the air basin, whereas the existing ambient air quality is measured by SCAQMD through a network of air quality monitoring stations. The monitoring station most representative of the project site is the Santa Clarita Valley Monitoring Station, located at 22224 Placerita Canyon Road in Santa Clarita. For more discussion on existing conditions and methodology, see Section 4.2, Air Quality, of the Draft EIR.

Regarding noise surveys, a Noise and Vibration Impact Study was prepared for the proposed project and included as Appendix J to the Draft EIR. The comment asserts potential impacts to future residents were not considered on site and the analysis is deficient for assessing impacts to the surrounding sensitive uses. As further detailed in Section 4.12, Noise, of the Draft EIR, significant unavoidable noise impacts would occur during construction due to an exceedance in noise thresholds for the nearest noise-sensitive uses in the project site's vicinity (e.g., the existing residences to the north, northeast, east, and southeast). Moreover, significant and unavoidable noise impacts would occur to the senior living facility during construction of other project components on site. Mitigation measures MM-NOI-1 and MM-NOI-2 were incorporated to reduce impacts; however, impacts would remain significant. Given this, no changes to the content or analyses in the Draft EIR are required as a result of this comment.

I16-8 The comment identifies references to another project within the discussion of known controversies and alternatives within Chapter 1, Executive Summary, of the Draft EIR. The comment correctly identified the errors in the Draft EIR. As such, a revision has been made, consistent with the discussion presented in Section 2.2 of the Draft EIR.

The comment identifies an error contained in Table 1-1, Summary of Project Impacts. The error on page 1-28 of the Draft EIR erroneously includes MM-CUL-1 through MM-CUL-3 to reduce cumulative impacts related to hazards and hazardous materials. Mitigation measures MM-FIRE-1 through MM-FIRE-3 were intended. As such, a revision has been made, consistent with the discussion presented in Section 4.8.7 of the Draft EIR. Similarly, the comment identifies an error contained in Table 1-1 of the Draft EIR. The table omits the summary of impacts related to public services. A revision has been made. This revision does not demonstrate inadequacy in the Draft EIR as Section 4.14, Public Services, is included within the EIR as a thorough discussion of the project's effects on public services. Table 1-1 merely provides a summary of impacts identified throughout the Draft EIR.

These revisions do not change the impact conclusions in the Draft EIR, nor do they result in any new significant impacts or the need for new or altered mitigation measures. Rather, the revisions reflected in the Final EIR merely augments the discussion already presented in the Draft EIR, and results in no change to the conclusions or mitigation measures previously presented. No new significant impact would occur nor would an increase in the severity of a previously identified significant impact would as a result. Therefore, these changes do not warrant recirculation of the Draft EIR.

I16-9 The comment asserts the determinations within the alternatives analysis is incorrect. As summarized in Chapter 1, Executive Summary, and further discussed in Chapter 6, Alternatives, the impacts related to aesthetics under Alternative 3, Private Recreational Facility Alternative, would be the same as the project. This is due to the existing environmental condition of the project site. For the purposes of CEQA, scenic vistas are determined from public vantage points. Wiley Canyon Road provides a potential public vantage point for views of hillsides and mountains. However, the quality of the views from the road near the project site is low due to intervening residential land uses, the I-5 freeway, aboveground utility infrastructure, and vegetation. As such, hillsides and mountains are regularly obscured by foreground elements and views from Wiley Canyon Road are typically narrow and short (Draft EIR, p. 4.1-9). The impacts under Alternative 3 would be the same as the proposed project due to the same conditions. Similarly, there are no officially designated state scenic highways within the project site's vicinity (Draft EIR, p. 4.1-9). Given the above, no changes to the content or analyses in the Draft EIR are required as a result of this comment.

I16-10 The comment raises concern for the ability of Alternative 4, the Construction Noise Setback Alternative, to meet all the project objectives and be the environmentally superior alternative. As detailed further in Table 6-8, Summary of Alternative 4 Success at Meeting project objectives, this alternative was determined to partially meet project objective No. 1, which states "Create a new mixed-use community that allows for residential, retail/commercial, and senior housing while preserving and enhancing natural resources." As stated in Table 6-8, under Alternative 4, only multifamily residential and a senior living facility are proposed on site. Retail is not proposed under this alternative. Similar to the proposed project, the alternative would not develop Lot 6 of the project site and keep the land as open space. As such, Alternative 4 would partially meet this objective (Draft EIR, p. 6-34). The alternative's ability to meet this objective is not based on feasibility. Instead, the EIR evaluates the alternatives as designed. Although this alternative would partially meet this objective and meet all other objectives, the EIR considered each alternative's ability to meet objectives in addition to the comparison of potential environmental effects to the proposed project. The Draft EIR concludes Alternative 1 would result in the least environmental impacts; however, CEQA Guidelines section 15126.6(e)(2) states that if the Environmentally Superior Alternative is the No Project Alternative, the EIR must also identify an Environmentally Superior Alternative among the other alternatives. Alternative 4 would eliminate the significant and unavoidable impact related to construction noise. Table 6-9, Comparison of Project and Alternatives Impacts demonstrates only Alternative 1 and Alternative 4 would eliminate the significant and unavoidable impact identified in the EIR. Moreover, Alternative 4 eliminates the significant and unavoidable construction noise impact with a 200-foot buffer between the mobile home park and the project site. The project's proposed commercial component is assumed to be in association with the senior living facility. Chapter 6 describes Alternative 4 with an overall reduction in the size and scope of the senior living facility. The comment's desire for commercial uses on site will be provided to the City's decision makers for their review and consideration as part of this Final EIR. However, no changes to the content or analyses in the Draft EIR are required as a result of this comment.

I16-11 The comment raises concern for the discussion contained in Chapter 1, Executive Summary, of the Draft EIR. The comment appears to be an introductory statement. The comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. No response is required.

I16-12 The comment asserts the Draft EIR does not include analysis of construction and operational impacts related to the off-site improvements along Wiley Canyon Road. The Draft EIR analyzes the proposed project in accordance with the CEQA Guidelines, including CEQA Guidelines Section 15378, which defines a "project" as the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment. The whole of the action, including the off-site improvements, is described in Chapter 3, Project Description. Although impacts were not separated throughout the EIR, the analysis contained within the EIR's appendices includes discussion on off-site improvements. For example, Appendix C-2 (Oak Tree Report) illustrates the survey area in Figure 2, Oak Tree Locations, within the project site and along the area of impact related to the off-site street improvements.

Regarding the comments on imported soil, for the purposes of CEQA, the air quality analysis determined the project would require approximately 85,000 cubic yards of soil; as such, the analysis utilizes this information to determine worker, vendor, and concrete truck trips, and estimates emissions through modeling (Appendix B). The location for which imported soil is obtained is speculative and beyond the

reasonable control of the City. The CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (CEQA Guidelines section 15145). For informational purposes, construction-related truck trips are regulated by local and state agencies. No change to the content or analyses in the Draft EIR are required as a result of this comment.

I16-13 The comment asserts the project does not meet the following project objective, "Create a new mixed-use community that allows for residential, retail/commercial, and senior housing while preserving and enhancing natural resources." The comment further states the project is not a mixed-use community. The project proposes 8,914 square feet of commercial in addition to proposed multifamily residential, senior living, and open space land uses on site. The comment correctly notes the requested Minor Use Permit, which is required when a project does not meet the minimum commercial floor area ratio (FAR) of the zone. In order to be in compliance with the zoning, the project requests the approval of a Minor Use Permit, which is a form of a land use development permit listed in the Santa Clarita Municipal Code. The comment also raises concern for the proposed commercial use's location on site. The proposed use is not required to be serving off-site residents. Instead, the intent of the Mixed Use – Neighborhood (MX-N) zone (Santa Clarita Municipal Code Section 17.35.020) is to create neighborhoods that integrate residential uses with complementary commercial services, including retail and office uses. Given this, no change or addition to the environmental analysis included in the Draft EIR is required. The comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

Regarding preservation or enhancements to natural resources, the project would redevelop an existing vacant and underutilized site with former agricultural uses. The project site is not considered open space according to the General Plan, with the exception of Lot 6. Analysis contained within the Draft EIR determined impacts to biological resources would be less than significant with mitigation incorporated. Biological resources, such as oak trees, were identified, and potential impacts would require an oak tree permit in accordance with the Santa Clarita Municipal Code. As such, through compliance with applicable regulations and protection measures, the Draft EIR determined impacts would be less than significant. Similarly, mitigation measures were incorporated to reduce impacts to biological resources. For example, MM-BIO-5 would reduce impacts to the South Fork of the Santa Clara River by requiring restoration or enhancements at a ratio of at least 2:1 for permanent impacts and restoration of impacted areas to pre-project conditions for temporary impacts. Therefore, restoration of natural resources would achieve the project's objective. No change to the content or analyses in the Draft EIR are required as a result of this comment.

I16-14 The comment asserts the proposed project is not similar to the surrounding community and does not meet the following project objective, "Provide development and transitional land use patterns that are compatible with surrounding communities and land uses and are consistent with the City's General Plan." The comment notes the proposed heights for buildings on site would be higher than the surrounding structures. In addition, the comment states the project lacks commercial uses on site.

The project would result in the redevelopment of a vacant underutilized site to construct buildings not to exceed 50 feet in height, consistent with the City's MX-N zone. Although the proposed building heights are not the same as adjacent structures, the project would comply with the City's General Plan and zoning regulations related to height and setbacks. Moreover, the project would achieve the project objective by introducing a range of heights across the project site, thereby transitioning the land use

patterns on site. As shown in Figure 3-4b, Tentative Tract Map, the multifamily residential component would include 2- and 3-story buildings along the site's edge and include 4-story buildings in the center of the site. Given this, no change or addition to the environmental analysis included in the Draft EIR is required.

Regarding the commercial uses on site, see Response to Comment I16-13 for more discussion.

I16-15 The comment asserts the project does not meet the following project objective, "Arrange land uses and add amenities to reduce vehicle miles traveled and to encourage the use of transit." The comment states the project would be auto dependent and does not include amenities to reduce vehicle miles traveled (VMT). Moreover, the comment raises concern for the lack of convenient connections from the proposed multiuse trail to land uses beyond residential.

Section 4.16, Transportation, of the Draft EIR determined impacts related to VMT would be less than significant. The proposed project would reduce auto-dependency through a VMT reduction strategy for shared parking (see Appendix K-4 of the Draft EIR). Moreover, the project would result in off-site street improvements, including the installation of Class I and II bicycle lanes and two bus stops along Wiley Canyon Road. The project also meets the project objective by providing multifamily residential, senior living, and commercial land uses on a site with recreational amenities, including but not limited to a clubhouse with fitness center, pools, and passive recreational areas which would reduce VMT of residents to other recreational facilities within the project site's vicinity. The project also includes project design features (PDF) to reduce VMT. See Section 4.16, Transportation, of the Draft EIR, for more details and discussion on PDF-TRA-1 through PDF-TRA-7. For more discussion on the VMT analysis, see Appendix K-1 of the Draft EIR. Regarding parking, see Topical Response No. 1 – Parking Plan for more discussion.

Regarding convenient connections from the proposed multiuse trail, the project would improve pedestrian connectivity by constructing an on-site pedestrian network and would improve the existing off-site pedestrian network by filling in gaps for pedestrian connectivity. This component is listed in the City's guidelines and aligns with General Plan Policy C 7.2. The project would construct the proposed pedestrian improvements per City standards. The applicant would work with the City to design sidewalks and/or shoulders and trails that would facilitate pedestrian movements throughout the project and connect to pedestrian improvements off-site. The sidewalks and/or shoulders would link areas within the project site and encourage residents to walk to the private recreational area and the trails for exercise. The project would not build walls, landscaping, or slopes that impede pedestrian circulation (Draft EIR, p. 4.16-17). Given this, no change or addition to the environmental analysis is required as a result of this comment.

I16-16 The comment asserts the project does not meet the following project objective, "Design neighborhoods to locate residential and non-residential land uses in close proximity to each other and major road corridors, transit and trails." The comment asserts the project's proposed land use mix and proposed improvements do not achieve this objective. The project meets this objective by introducing multifamily residential, senior living, and commercial land uses on site, adjacent to existing commercial uses to the south of the site. Implementation of the proposed project would improve Wiley Canyon Road with bus turnouts and bicycle facilities along the existing corridor. The comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. No changes to content or analyses in the Draft EIR are required as a result of this comment.

I16-17 The comment asserts the project does not meet the following project objective, "Maintain and enhance the use of Wiley Canyon Creek with native revegetation as to serve as a natural channel to be utilized by wildlife." The comment asserts the project would result in significant indirect impacts. As described in Section 4.3, Biological Resources, the project would result in less than significant impacts with the incorporation of mitigation measures MM-BIO-1 through MM-BIO-5. See Section 4.3 for more discussion. No change is required as a result of this comment.

I16-18 The comment asserts the project's off-site improvements are not analyzed in the Draft EIR. Additionally, the comment raises concern for the environmental impacts associated with imported soil. This comment is similar to Comment I16-12, above. See Response to Comment I16-12 for more discussion.

I16-19 The comment states two recently completed self-storage facilities and Metro improvements to the I-5 freeway were not included in the related projects list and not captured within the EIR's cumulative analysis. This comment is similar to Comment I16-5, above. See Response to Comment I16-5 for more discussion.

I16-20 The comment asserts significant impacts would occur related to aesthetics and viewsheds. The comment further requests renderings of the proposed project to visualize potential impacts. For the purposes of CEQA, scenic vistas are determined from public vantage points. For example, Wiley Canyon Road provides a potential public vantage point for views of hillsides and mountains. However, the quality of the views from the road near the project site is low due to intervening residential land uses, the I-5 freeway, aboveground utility infrastructure, and vegetation. As such, hillsides and mountains are regularly obscured by foreground elements and views from Wiley Canyon Road are typically narrow and short (Draft EIR, p. 4.1-9). Similarly, views from The Old Road at public vantage points are obstructed due to intervening structures, the I-5 freeway, aboveground utility infrastructure, and vegetation. Given this, no change or addition to the environmental analysis is required as a result of this comment. However, the comment's request for renderings will be provided to the City decision makers for review of this Final EIR.

I16-21 The comment asserts the project conflicts with General Plan Policy CO 6.6.4 and that the project would impact scenic views and state scenic highway. Table 4.10-2, General Plan Land Use Consistency Analysis, includes discussion on the project's consistency with the overarching goal, Goal CO 6, Preservation of scenic features that keep the Santa Clarita Valley beautiful and enhance quality of life, community identity, and property values. The consistency analysis refers to the impact conclusions within Section 4.1, Aesthetics, of the Draft EIR, which state less than significant impacts would occur due to the existing conditions. See Response to Comment I16-20 for more discussion related to scenic vistas. Moreover, there are no officially designated state scenic highways within the project site's vicinity as specified in the CEQA threshold. The segment of the I-5 freeway adjacent to the project site is eligible for designation; however, in the event the freeway is considered an officially designated state scenic highway, impacts would occur if the project would substantially damage scenic resources, such as trees, rock outcroppings, and historic buildings. Given the lack of an officially designated scenic highway, no change or addition to the environmental analysis is required as a result of this comment.

I16-22 The comment asserts the proposed project is not compatible in size and scale with the surrounding community. In addition, the comment states the project would not be an attractive asset to the community. The comment also raises concern for the proposed height. For discussion on height, see Response to Comment I16-14, above.

Regarding compatibility, the comment is subjective and expresses general opposition to the proposed project. Table 4.1-1, Project Consistency with the Community Character and Design Guidelines, demonstrates the project's consistency with the overall goals of City's Design Guidelines. In addition to the analysis contained in Table 4.1-1, the project's consistency with the site's land use designation and zoning is further discussed in Section 4.10, Land Use and Planning. As described, the proposed project would not require a General Plan amendment or zone change. Thus, the project would comply with regulations on height and setbacks, for example. The project is also required to comply with the City's architectural design review and subject to the provisions outlined in the Santa Clarita Municipal Code Section 17.55.040. Compliance with these provisions is subject to discretionary approval. Given this, no change or addition to the environmental analysis is required as a result of this comment.

I16-23 The comment raises concern for the project's consistency with Santa Clarita Municipal Code Section 17.55.040. The project asserts the project limits access and does not reduce massing. The project would be accessible via the northeastern corner of the site and from proposed pedestrian trails accessible along the eastern edge of the site. The Santa Clarita Municipal Code requires buildings to be oriented along the street frontage, which is illustrated in Figure 3-3, Site Development Plan. However, orientation is in regard to the building's frontage and not regarding public access. Additionally, the Figure 3-5, Conceptual Elevations, illustrates the front façade of one of the buildings with varying sight lines that reduce the overall massing of the three-story building. Moreover, compliance with Municipal Code Section 17.55.040 is subject to discretionary approval. The Draft EIR as written adequately demonstrates compliance. Given this, no change or addition to the environmental analysis is required as a result of this comment.

I16-24 The comment raises concern for impacts to scenic vistas. This comment is similar to Comments I16-20 and I16-21. See Responses to Comments I16-20 and I16-21 for more discussion.

I16-25 The comment asserts the analysis contained in Section 4.1, Aesthetics, of the Draft EIR, is not supported with visual simulations. Threshold AES-3 asks two different questions depending on the project site's location within an urbanized area. The analysis contained in Section 4.1 of the EIR concludes the project site is located within an urbanized area because the City's population is over 100,000 persons (Draft EIR, p. 4.1-10). As such, the impact analysis is based on the project's potential to conflict with applicable zoning or other regulations governing scenic quality. The Draft EIR includes discussion including but not limited to the consistency analysis contained in Table 4.1-1, Project Consistency with Community Character and Design Guidelines. Less than significant impacts would occur due to the discussion related to the project's consistency with applicable regulations governing scenic quality. Although, the Draft EIR includes Figure 3-5, Conceptual Elevations, which illustrates a visual representation of the proposed architectural style, the request for renderings of the proposed project will be provided to the City's decision makers for review of this Final EIR. Given the above, no change or addition to the environmental analysis is required as a result of this comment.

I16-26 The comment asserts the project conflicts with the City's Community Character and Design Guidelines. This comment is similar to Comment I16-22. See Response to Comment I16-22 for more discussion.

I16-27 The comment states the project would introduce new sources of substantial light and asserts the less-than-significant impact determination is not supported by evidence. The analysis contained in Section 4.1 of the EIR states the project would introduce significant new sources of light, including interior lighting, exterior mounted lighting, and outdoor lighting throughout the site. However, design

considerations, such as walls and fences are proposed on site to reduce light trespass to adjacent light-sensitive receptors. In addition, the project would be required to comply with Section 17.51.050, Outdoor Lighting Standards, of the Santa Clarita Municipal Code, which would regulate and minimize light by design and require the applicant to submit a lighting plan for review and approval by the Director of the City's Planning Division. Given this, impacts were determined to be less than significant. No change or addition to the environmental analysis is required as a result of this comment.

I16-28 The comment raises concern for the cumulative impacts related to aesthetics. This comment is similar to Comment I16-5. See Response to Comment I16-5 for more discussion on cumulative impacts.

The comment raises concern for the impacts associated with the off-site water tank. Chapter 3, Project Description, lists off-site infrastructure improvements as part of the proposed project. The Draft EIR analyzes the proposed project in accordance with the CEQA Guidelines, including CEQA Guidelines Section 15378, which defines a "project" as the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment. The whole of the action, including the off-site improvements, is analyzed throughout the Draft EIR. The comment asserts the proposed water tank would be located on a prominent ridgeline east of the project site. Chapter 3, Project Description, of the Draft EIR states the implementation of the project would result in the construction of a new water tank approximately 3,100 feet to the east of the site. Section 4.1 of the Draft EIR determines the project site's vicinity is not located within an identified primary or secondary ridgeline (Draft EIR, p. 4.1-18).

Regarding the comments on imported soil, for the purposes of CEQA, the air quality analysis determined the project would require approximately 85,000 cubic yards of soil. The location for which imported soil is obtained is speculative and beyond the reasonable control of the City. The CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (CEQA Guidelines section 15145). No change or addition to the environmental analysis is required as a result of this comment.

I16-29 The comment asserts the Draft EIR's analysis related to air quality is deficient. The comment notes the project's proposed residences in proximity to the I-5 freeway. The Draft EIR discloses the existing environmental conditions related to air quality and noise within Section 4.2, Air Quality, and Section 4.12, Noise. However, CEQA generally requires analysis of the effects of a project on the environment (CEQA Guidelines Section 15126.2), as opposed to the environment's effects on a project (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369). Regarding air quality, however, a Health Risk Assessment (Appendix B to the Draft EIR) was prepared, which determined the maximum calculated cancer risk would be reduced to a less-than-significant level in accordance with California Code of Regulations Title 24 standards requiring the installation of window filters (Draft EIR, p. 4.2-39). Regarding operational noise, impacts related to off-site traffic noise as a result of the project were determined to be less than significant.

I16-30 The comment incorrectly states that the modeling documented in the appendix does not factor in local topography. As discussed in Section 4.2, Air Quality, of the Draft EIR, the analysis incorporated the estimated construction emissions and dispersion modeling using the USEPA AMS/EPA Regulatory Model (AERMOD) model with meteorological data from the closest SCAQMD meteorological monitoring station. AERMOD incorporates a terrain data preprocessor that incorporates complex terrain using USGS Digital Elevation Data of the local project site and surrounding area.

The comment makes claims that winds concentrate vehicle emissions at the project site without providing any scientific substantial evidence. Additionally, the South Coast Air Quality Management District (SCAQMD) maintains a network of air quality monitoring stations located throughout the Air Basin to measure ambient pollutant concentrations, the monitoring station data utilized in the EIR is based on the SCAQMD network and representative of the site area.

The comment incorrectly claims that due to higher surrounding topography puts the new residential units at risk. As discussed in the EIR, the impact analysis included detailed freeway health risk assessment on the proposed projects new residential units. This analysis as explained above and in Section 4.2 incorporates a terrain data preprocessor that incorporates complex terrain using USGS Digital Elevation Data of the local project site and surrounding area. The analysis incorporated traffic volumes and speeds for the I-5 freeway and ramps in the project vicinity obtained from the California Department of Transportation monitoring data. Following OEHHA Guidance (2015), the HRA assesses a 30-year residential exposure with age-specific sensitivities to account for early life exposure. The analysis spans 30 years from project buildout, defined by the period immediately following the earliest anticipated project completion. This represents the worst-case long-term exposure from the freeway sources as future vehicles implement cleaner technologies (natural gas, hybrid and electric vehicles) moving away from a dependence on diesel and gasoline fossil fuels.

The HRA analysis conservatively modeled all trucks as diesel heavy-heavy duty trucks (HHDT) and the balance of the traffic as gasoline-fueled light-duty passenger vehicles (gasoline cars). Air toxic emissions from the diesel HHDT were characterized by the exhaust emissions of DPM (using PM_{10} exhaust as a surrogate for whole Diesel Exhaust representing both plus the toxic particulate and gaseous components of the exhaust). Gasoline passenger (car) vehicle emissions were characterized by total organic gaseous exhaust (TOG) also speciated for the five carcinogenic MSATs: acetaldehyde, benzene, 1,3-butadiene, formaldehyde, and naphthalene. The maximally exposed future resident was determined to be 7.4 in one million after reductions from MERV 13 filters. As the maximum impact would be less than the significance threshold of ten (10) in one million, impacts would be less than significant, and mitigation is not required. No further action is required.

I16-31 The comment incorrectly states that the EIR utilized inappropriate existing ambient air quality data to characterize the existing conditions at the site. As described in Section 4.2, Air Quality, of the Draft EIR, the SCAQMD maintains a network of air quality monitoring stations located throughout the Air Basin to measure ambient pollutant concentrations. The monitoring station most representative of the project site is the Santa Clarita Valley Monitoring Station, located at 22224 Placerita Canyon Road Santa Clarita, CA 91321. Criteria pollutants monitored at this station include ozone, NO_2, CO, and PM_{10}. This monitoring location is located only 2 miles east of the project site and is considered directly representative of the project site due to its proximity and similar local meteorological conditions.

Additional monitoring stations were used to complete the description of Ambient Air Quality in the project vicinity. The West San Fernando Valley Monitoring Station was referenced for $PM_{2.5}$ data, located at 18330 Gault St, Reseda CA 91702, and the Central Los Angeles County Monitoring Station, located at 1630 North Main Street, Los Angeles, CA 90012, was referenced for Pb and SO_2 data.

The West San Fernando Valley Monitoring Station is located in a highly populated suburb of Van Nuys approximately 2.3 miles west of Van Nuys airport and 3.3 miles west of I-405. Due to this station's location within a higher urban density with similar prevailing wind patterns as the meteorological data

from Santa Clarita Valley Monitoring Station as reported by SCAQMD (https://www.aqmd.gov/assets/aermet/AERMET_files_And_HRA_Tool.html), $PM_{2.5}$ ambient data reported would be considered conservative compared to the project site. The Central Los Angeles County Monitoring Station is located 0.7 miles from I-5 and would be considered conservative for Pb and SO_2 ambient data compared to the project site given the higher urban density and associated emission sources of Pb and SO_2. No further action is required.

I16-32 The comment asserts significant impacts would occur related to the exposure of sensitive receptors to substantial pollutant concentrations from the I-5 freeway. Similar to Response to Comment I16-29, CEQA generally requires analysis of the effects of a project on the environment (CEQA Guidelines Section 15126.2), as opposed to the environment's effects on a project (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369). Section 4.2, Air Quality, of the EIR further detailed the methodology for toxic air contaminants (Draft EIR, p. 4.2-27). As such, a Health Risk Assessment (Appendix B to the Draft EIR) was prepared to assess these air quality conditions. As a result of the study, less than significant impacts would occur with the compliance with existing regulations, such as those within California Code of Regulations Title 24 that require the installation of window filters (Draft EIR, pp. 4.2-38 and 4.2-39). Given this, no change or addition to the environmental analysis is required as a result of this comment.

I16-33 The comment incorrectly states that tire and brake emissions were not included in the EIR analysis. As discussed in Section 4.2, Air Quality, of the Draft EIR, the project includes impact analysis for SCAQMD Final Localized Significance Threshold (LST) Methodology for both construction and operation. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. For PM_{10} LSTs were derived based on requirements in SCAQMD Rule 403 – Fugitive Dust. For the proposed project, the screening criteria provided in the Final Localized Significance Threshold Methodology were used to determine localized construction and operational emissions thresholds for the project. The LST analysis includes CalEEMod emissions estimates which include tire and brake wear particulate emissions from mobile sources. As demonstrated in EIR Tables 4.2-8 and 4.2-9, LST impacts for construction and operation were determined to be less than significant and as such emissions from tire and brake wear would not result in a health risk as the ambient air quality standards are designed to be protective heath standards.

The comment incorrectly states that the HRA assumes flat terrain. As discussed in Section 4.2, the analysis incorporated the estimated construction emissions and dispersion modeling using the USEPA AMS/EPA Regulatory Model (AERMOD) model with meteorological data from the closest SCAQMD meteorological monitoring station. AERMOD incorporates a terrain data preprocessor that incorporates complex terrain using USGS Digital Elevation Data of the local project site and surrounding area.

The comment incorrectly states that the project would expose senior residents to toxic particulate air pollution. As demonstrated in Section 4.2, through the appropriate analysis of LSTs for construction and operation and health risk assessment modeling for both onsite and offsite sensitive receptors, the EIR demonstrates less than significant impacts to sensitive receptors for particulate air emissions. No further action is required.

I16-34 The comment raises concern for odors associated with the Sunshine Canyon Landfill. The comment suggests impacts would occur on site due to the proximity of the landfill. CEQA generally requires analysis of the effects of a project on the environment (CEQA Guidelines Section 15126.2), as opposed to the environment's effects on a project (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369). Furthermore, CEQA requires the analysis of the project's potential to result in other emissions (such as odors). Analysis within the EIR is provided on the project's construction and operational activities. Compliance with applicable regulations would reduce impacts to a less-than-significant level. Moreover, the project does not propose land uses associated with typical odor complaints. Given this, no change or addition to the environmental analysis is required as a result of this comment.

I16-35 The comment raises concern for the project's location adjacent to the I-5 freeway. The comment is similar to Comment I16-32. See Response to Comment I16-32. However, this comment will be provided to the City's decision makers for review of this Final EIR.

I16-36 The comment asserts potential impacts would occur associated with the import of soil to the project site. The location for which imported soil is obtained is speculative and beyond the reasonable control of the City. The CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (CEQA Guidelines section 15145). No change or addition to the environmental analysis is required as a result of this comment.

I16-37 The comment raises concern for deferred mitigation in regards to potential impacts to Crotch's bumble bee and least Bell's vireo. MM-BIO-1 of the Draft EIR provides surveys, avoidance and minimization measures, and the required actions and compensatory mitigation needed for impacts to Crotch's bumble bee should the species be considered present on the project site before construction. Likewise, MM-BIO-2 provides similar measure to sufficiently identify if least Bell's vireo is present and the need for compensatory mitigation for the loss of its occupied habitat.

I16-38 The comment asserts the impact analysis on riparian habitat is deficient. The project would impact 0.09 acre of the Fremont cottonwood/mulefat forest, 0.60 acre of the Fremont cottonwood forest, and 0.09 acre of the California sycamore woodland, which are considered sensitive vegetation communities. MM-BIO-4 of the Draft EIR provides for 1:1 mitigation either through implementation of an onsite habitat mitigation and monitoring plan (HMMP) or through off-site restoration or enhancement at a ratio no less than 1:1 and may include the purchase of mitigation credits at an agency- approved off-site mitigation bank or an in-lieu fee program within Los Angeles County acceptable to the City. The approximately 0.78-acre of sensitive vegetation communities is associated with a 0.33-mile earthen section of the South Fork of the Santa Clara River. As stated in Section 4.3.1.2 of the Draft EIR, the stream is heavily modified and channelized as it flows through the urbanized area. The river is channelized upstream (east of Interstate 5) of the project and downstream of the project for approximately 1.6 miles. If onsite mitigation is implemented, then the loss would be mitigated locally and the performance standards required by the HMMP are expected to result in the establishment of higher quality habitat than the existing conditions. If the mitigation is implemented offsite, then the credits purchased at a mitigation bank or in-lieu fee program would be expected to support larger more continuous areas of similar riparian vegetation that would have a higher value than the existing onsite sensitive vegetation due to its size. As such, 1:1 mitigation for impacts of relatively small amount of isolated and disturbed sensitive vegetation would be sufficient to reduce impact to less than significant.

I16-39 The comment asserts potential impacts to biological resources would occur associated with the import of soil to the project site. The comment is similar to Comment I16-36. See Response to Comment I16-36.

I16-40 The comment asserts potential impacts to cultural resources would occur associated with the import of soil to the project site. The comment is similar to Comment I16-36. See Response to Comment I16-36.

I16-41 The comment asserts potential impacts related to energy would occur associated with the import of soil to the project site. The comment is similar to Comment I16-36. See Response to Comment I16-36.

I16-42 The comment asserts potential impacts related to geology and soils would occur associated with the import of soil to the project site. The comment is similar to Comment I16-36. See Response to Comment I16-36.

I16-43 The comment asserts the analysis of greenhouse gas emissions is deficient which is further detailed in Comments I16-88 and I16-89. See Responses to Comments I16-88 and I16-89 for more discussion.

I16-44 The comment asserts potential impacts related to greenhouse gas emissions (GHG) would occur associated with the import of soil to the project site. The comment is similar to Comment I16-36. See Response to Comment I16-36. However, the GHG emissions generated from importing approximately 85,000 cubic yards of soil during construction are forecasted by assuming a conservative estimate of activities, including project-specific inputs based on equipment type and construction schedule. Worker, vendor, and concrete truck trips were based on information obtained from the applicant. Thus, soil import, and the emissions from on-road vehicles, were estimated within the modeling to determine the construction emissions from each activity (Draft EIR, pp. 4.7-30 and 4.7-31). Given this, no change or addition to the environmental analysis is required as a result of this comment.

I16-45 The comment raises concern for hazardous conditions as a result of the project site's proximity to the I-5 freeway. The potential of accidents from the I-5 freeway onto the project site is speculative and beyond reasonable control of the City. The CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (CEQA Guidelines section 15145). As detailed in the Topical Responses, above, Metro is slated to commence construction of an 18-foot-tall sound wall by late 2024. The installation of the sound wall would reduce hazards related vehicle crashes onto the project site.

I16-46 The comment asserts impacts related to electric vehicles would increase risks onto the project site. This comment is similar to Comment I16-45. See Response to Comment I16-45. Overall, the comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR.

I16-47 The comment asserts the Draft EIR does not include analysis of construction and operational impacts related to the off-site improvements. The Draft EIR analyzes the proposed project in accordance with the CEQA Guidelines, including Section 15378, which defines a "project" as the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment. The whole of the action, including the off-site improvements, is described in Chapter 3, Project Description. Although impacts were not separated

throughout the EIR, the analysis contained within the EIR's appendices includes discussion on off-site improvements. No change to the content or analyses in the Draft EIR are required as a result of this comment.

I16-48 The comment asserts potential impacts related to hydrology and water quality would occur associated with the import of soil to the project site. The comment is similar to Comment I16-36. See Response to Comment I16-36.

I16-49 The comment asserts the project is inconsistent with the General Plan. The comment further cites the intent of the project site's zoning, "encouraged in order to create neighborhoods that integrate residential uses with complementary commercial services, including retail and office uses." The project proposes a mix of residential and non-residential uses, including commercial on site. As discussed further in Section 4.10, Land Use and Planning, of the Draft EIR, the project requests the approval of Minor Use Permit, which is required when a project does not meet the minimum commercial floor area ratio (FAR) of the zone. Upon approval of a Minor Use Permit, the project would be in compliance with the Santa Clarita Municipal Code.

I16-50 The comment requests additional commercial uses on site. As such, this comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR. Overall, the comment is similar to Comment I16-49. See Response to Comment I16-49.

I16-51 The comment asserts the project is inconsistent with the desired development characteristics of the site. The comment notes the project proposes building heights between two and four stories, which is not consistent with the surrounding neighborhood. In addition, the comment asserts a lack of parking provided for the project.

As detailed Section 4.10, Land Use and Planning, of the Draft EIR, the project is proposed within the building height restrictions for the site's zoning. Moreover, as noted by the comment, the project is confined to a site that does not include existing residential neighborhoods along the Calgrove Corridor. The project would include landscaping and other project design features to adequately buffer the project from the adjacent neighborhoods and properties. Redevelopment of existing residential uses would not occur. No change to the content or analyses in the Draft EIR are required as a result of this comment.

Regarding parking, see Topical Response No. 1 – Parking Plan, in response to comments raised about project parking.

I16-52 The comment asserts the project is inconsistent with the desired development characteristics. The comment notes the proposed commercial square footage on site and asserts the project does not contain integrated housing types. The project site along with the existing commercial land uses to the south are identified as a Special Development Area. As noted in Response to Comment I16-49, the project requests the approval of a minor use permit in order to be consistent with the site's zoning. However, the consistency analysis for the desired development characteristics is applied to the whole Special Development Area. Given this, the project would support the economic goals of the area by providing on-site commercial uses (i.e., jobs) as well as jobs associated with the senior living facility on site. Additionally, the project proposes residential uses of varying height and tenure. Furthermore, the placement of the proposed housing scales in height towards the center of the site; thus, achieving

integration of housing types. Given this, no change or addition to the environmental analysis is required as a result of this comment.

I16-53 The comment asserts the project is inconsistent with the desired development characteristics, noting the proposed height and massing. This comment is similar to Comment I16-51. See Response to Comment I16-51 for more discussion.

I16-54 The comment asserts the project does not create east/west sight lines. Additionally, the comment asserts the project would block views. As described in Table 4.10-1, the project would be subject to review by the Planning Commission for consistency with SCMC Section 17.55.020, Mixed Use Development Standards, and Section 17.55.040, Architectural and Design Standards. The comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

Regarding views, this comment is similar to Comment I16-20. See Response to Comment I16-20.

I16-55 The comment asserts the proposed improvements to Wiley Canyon Road would divert traffic to cut through existing neighborhoods and wrongly states that the project's impact analysis has been deferred. A summary of the project's traffic analysis is provided in Appendix K-5 of the Draft EIR. As a result of the analysis, the project would construct or pay its fair-share towards improvements required to reduce operational deficiencies, including improvements to Wiley Canyon Road such as roundabouts at the project access, Canerwell Street, and at Calgrove Boulevard to improve traffic flow along Wiley Canyon Road. These improvements would be included as conditions of approval for the project.

Based on research published in the National Cooperative Highway Research Program (NCHRP) Report[4] roundabouts are used as traffic calming devices and regulate the movement of traffic by reducing speed and delay for all vehicles. Based upon these data, roundabouts constructed for the project would not result in changing the traffic pattern in the area or result in cut-through traffic. The project's traffic analysis included in Appendix K-5 is adequate. No change or addition to the environmental analysis is required as a result of this comment.

It is not anticipated traffic would divert to streets within the Oak Ridge Estates neighborhood, as these routes do not provide a time or distance savings for drivers. However, as part of the conditions of approval, the applicant will be required to conduct traffic counts in the Oak Ridge Estates area both before and after project implementation. Should these counts demonstrate a significant diversion of vehicles into the neighborhood, the applicant will be required to implement appropriate traffic calming measures to discourage such diversion.

I16-56 The comment asserts the project is not a mixed-use project. This comment is similar to Comment I16-52. See Response to Comment I16-52. Moreover, the project would incorporate additional land uses,

[4] See page 2-9, and 2-10, Chapter 2/Roundabout Consideration. National Academies of Sciences, Engineering, and Medicine. 2010. Roundabouts: An Informational Guide – Second Edition. Washington, DC: The National Academies Press. https://doi.org/10.17226/22914.

such as recreational and open space uses, which would support the project residents and local vicinity. Given this, no change or addition to the environmental analysis is required as a result of this comment.

I16-57 The comment asserts the project is not a mixed-use project. This comment is similar to Comment I16-56. See Response to Comment I16-56.

I16-58 The comment raises concern for air quality and noise exposure at the project site. The Draft EIR discloses the existing environmental conditions related to air quality and noise within Section 4.2, Air Quality, and Section 4.12, Noise. However, CEQA requires analysis of the effects of a project on the environment (CEQA Guidelines Section 15126.2), not the environment's effects on a project (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369). Moreover, the environment's impacts on a project may need to be included in CEQA if a project may exacerbate an existing environmental condition.

Regarding air quality, however, a Health Risk Assessment (Appendix B to the Draft EIR) was prepared given the proximity of the project to the freeway. The analysis determined the maximum calculated cancer risk would be reduced to a less-than-significant level due to compliance with California Title 24 standards requiring the installation of window filters (Draft EIR, p. 4.2-39).

Regarding operational noise, impacts related to off-site traffic noise as a result of the project were determined to be less than significant given that the existing baseline plus project traffic noise levels analyzed would have a noise level changes less than 3 dBA significance threshold increase (Draft EIR, pp. 4.12-15 through 4.12-17). As further described in Section 4.12 and Appendix J, Noise and Vibration Study, the results of the noise analysis included existing ambient noise conditions from the I-5 freeway and local streets.

Given the above, the project would not result in significant impacts related to the freeway. No change or addition to the environmental analysis is required as a result of this comment.

I16-59 The comment asserts the project would result in aesthetic impacts. Although the project would change the existing conditions, the project as proposed would not require a General Plan amendment or zone change. As such, the project would comply with regulations on building height. The project is also required to comply with the City's architectural design review and subject to the provisions outlined in the Santa Clarita Municipal Code Section 17.55.040. Regarding impacts to viewsheds and state scenic highways, this comment is similar to Comment I16-21. See Response to Comment I16-21 for more discussion.

I16-60 The comment asserts the project is not mixed-use and would be vehicle-dependent. The project proposes multifamily residential, senior living, commercial, and open space land uses. As noted in the above responses to comments, the project requests the approval of Minor Use Permit, which is required when a project does not meet the minimum commercial floor area ratio (FAR) of the zone. Upon approval of a Minor Use Permit, the project would comply with the Santa Clarita Municipal Code. Furthermore, as demonstrated in Section 4.16, Transportation, of the Draft EIR, impacts related to VMT would be less than significant. The project includes project design features (PDF) to reduce VMT. See Section 4.16, Transportation, for more details and discussion on PDF-TRA-1 through PDF-TRA-7. Moreover, the project would result in off-site street improvements, including the installation of Class I

and II bicycle lanes and two bus stops along Wiley Canyon Road, which would reduce vehicle trips. No change or addition to the environmental analysis is required as a result of this comment.

I16-61 The comment raises concern for the amount of commercial square footage proposed. As noted in the above responses to comments, the project requests the approval of Minor Use Permit, which is required when a project does not meet the minimum commercial floor area ratio (FAR) of the zone. Upon approval of a Minor Use Permit, the project would comply with the Santa Clarita Municipal Code. No change or addition to the environmental analysis is required as a result of this comment.

I16-62 The comment asserts the project is not mixed-use. Regarding the commercial uses, see Response to Comment I16-61. Regarding an integration of uses, the project proposes residential uses of varying height. The placement of the proposed housing scales in height towards the center of the site. Given this, no change or addition to the environmental analysis is required as a result of this comment.

I16-63 The comment raises concern for surface parking. While the project does not include subterranean parking alternatives, the project would include use of private garages for a portion of the multi-family units. For more discussion regarding parking, see Topical Response No. 1 – Parking Plan.

I16-64 The comment asserts significant air quality and noise impacts would occur on the project site during operations. This comment is similar to Comment I16-58. See Response to Comment I16-58 and I16-69. In addition, the comment expresses concern for on-site existing conditions. This comment is similar to Comment I16-38; thus, see Response to Comment I16-38 for more discussion on air quality.

I16-65 The comment raises concern for the project's proximity to the I-5 freeway. The Draft EIR discloses the guidance on mobile source emissions by the California Air Resources Board (CARB), which states TAC exposure and health risk drops substantially within the first 300 feet from a freeway and generally recommends avoiding sensitive land uses within 500 feet of a freeway (Draft EIR, p. 4.2-27). The closest lane of traffic on the I-5 freeway would be approximately 66 feet to 115 feet from the project site property line where the proposed development would occur. The proposed townhomes along the project site's western boundary would have an additional buffer distance ranging from approximately 5 feet to 24 feet from the property line. As a result, a Health Risk Assessment (Appendix B to the Draft EIR) was prepared given the proximity of the project to the freeway. The analysis determined the maximum calculated cancer risk would be reduced to a less-than-significant level due to compliance with California Title 24 standards requiring the installation of window filters (Draft EIR, p. 4.2-39).

Regarding the comment's concerns for air pollution on site, as stated in EIR Section 4.2, freeways and high-traffic roads are significant sources of TAC emissions. CARB recommends siting sensitive land uses at least 500 feet away from such sources. As the proposed project would develop residential areas near the I-5 freeway, a HRA was conducted to disclose the potential risk to future occupants of the proposed project. The closest lane of traffic on the I-5 freeway would be approximately 66 feet to 115 feet from the project site property line where development would occur. The townhomes along the project site's western boundary would have an additional buffer distance ranging from approximately 5 feet to 24 feet from the property line. However, the California Code of Regulations Title 24 requires the installation of filters that meet the Minimum Efficiency Reporting Value (MERV) of 13, which typically results in a reduction of up to 85 percent in DPM (SCAQMD 2008b). As demonstrated in EIR Section 4.2, the maximally exposed future resident was determined to be less than significant. While the location is within the recommended CARB sitting distance to the nearby freeway, the detail health risk

analysis provided demonstrates future occupants of the project would result in a less than significant impact. No further action is required.

I16-66 The comment states the project does not include "village commercial centers" as identified in General Plan Policy LU 4.1.2. As stated in Table 4.10-2, General Plan Land Use Consistency Analysis, this policy is not applicable to the proposed project. The project would include on-site commercial space; however, the proposed use would not serve as a commercial center. Although the project does not apply to this policy, the project would not conflict with the implementation of this policy, the overarching objective or goal. Given that the project would not conflict with this policy, the project would not cause a significant environmental impact. No change or addition to the environmental analysis is required as a result of this comment.

I16-67 The comment states the project is not consistent with General Plan Policy 5.2.2, Provides for location of neighborhood commercial uses in proximity to the neighborhoods they serve, to encourage cycling and walking to local stores. The discussion erroneously identifies the proposed commercial use as neighborhood serving. A revision was made to state this policy is not applicable to the proposed project. This revision does not demonstrate inadequacy in the Draft EIR as the project would not conflict with the implementation of this policy, the overarching objective or goal. Given that the project would not conflict with this policy, the project would not cause a significant environmental impact. The change in the consistency analysis merely clarifies the commercial use.

This revision does not change the impact conclusion in the Draft EIR, nor does it result in any new significant impacts or the need for new or altered mitigation measures. Rather, the revision reflected in the Final EIR merely augments the discussion already presented in the Draft EIR, and results in no change to the conclusions or mitigation measures previously presented. No new significant impact would occur nor would an increase in the severity of a previously identified significant impact would as a result. Therefore, these changes do not warrant recirculation of the Draft EIR.

I16-68 The comment asserts the project is not consistent with Policy LU 5.2.5. However, as stated in Table 4.10-2, General Plan Land Use Consistency Analysis, the project includes the development of a mix of uses including multifamily residential units, a senior care facility, as well as commercial and recreational space. The project also includes project design features (PDF) to reduce VMT. See Section 4.16, Transportation, for more details and discussion on PDF-TRA-1 through PDF-TRA-7. Additionally, the project includes circulation improvements including 1.3 miles of pedestrian and biking trails, which would encourage walking and trip reduction for employees and residents of the project site, as well as residents of surrounding neighborhoods. No change or addition to the environmental analysis is required as a result of this comment.

I16-69 The comment raises concern for off-site noise during operations, alleging a 30% project-related increase in traffic volumes on I-5. As analyzed in the project Traffic Studies (Appendix K-2 and K-3 of the DEIR), the project would increase traffic volumes along I-5 adjacent to the project site by 15% (3,488 ADT added to baseline of 22,279 ADT); for the segment of Wiley Canyon Road adjacent to the project site, traffic volumes would increase from 8,700 to 12,188 (a 40% increase) as a result of project contributions. However, for a 3 dBA increase to occur, a doubling of traffic volumes on a roadway (a 100% increase) would be necessary. As detailed in Section 4.12, Noise, of the Draft EIR, impacts related to off-site traffic noise as a result of the project were determined to be less than significant

given that the existing baseline plus project traffic noise levels analyzed would have a noise level changes less than 3 dBA significance threshold increase (Draft EIR, pp. 4.12-15 through 4.12-17).

I16-70 The comment states the project would not be consistent with General Plan Policy LU 3.3.3. However, as stated in Table 4.10-2, General Plan Land Use Consistency Analysis, the policy is not applicable to the proposed project. The project does not involve the construction of improvements associated with a major entrance point to the community. Although the project would involve off-site improvements to Wiley Canyon Road and associated intersections, such as on Calgrove Boulevard, the project would not result in changes to the on and off ramps from I-I-5. As such, the project would not conflict with the implementation of this policy. Although the project does not apply to this policy, the project would not conflict with the implementation of this policy, the overarching objective or goal. Given that the project would not conflict with this policy, the project would not cause a significant environmental impact. No change or addition to the environmental analysis is required as a result of this comment. Regarding the comment's aesthetics concerns, see Section 4.1 of the Draft EIR for more information on the project's impacts.

I16-71 The comment incorrectly states the analysis contained in the VMT reduction study is speculative and not supported by evidence. The project's VMT reduction potential has been calculated using two measures that are included in the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (Draft 2021 and Final 2024) (CAPCOA Handbook) as well as City's Transportation Analysis Updates in Santa Clarita (May 19, 2020). These measures are consistent with City's General Plan policies C1.2.1, C3.3.1 and C 3.3.4The reduction percentage provided in the CAPCOA Handbook is based on substantial evidence as it uses several studies and research papers to provide a quantifiable methodology to estimate VMT reduction possible from a development project. The reduction allowed by the first measure T-1 Increase Residential Density can reduce project VMT by up to 30% based on residential density comparison. The residential density accounts for all units proposed on-site, i.e. multi-family and senior living. The scale of application of this measure is at Project/Site level and is considered suitable for larger developments within residential zones. The project VMT per capita exceeds the VMT per capita threshold only by 13.26%, which is expected to be achieved by adding a dense multi-family development with mixed-use characteristics, access to transit at project access intersection, as well as schools and shopping facilities within ¾ of a mile. Additionally, the project has applied trip reductions for internal capture i.e. trips that would remain on-site and pass-by reductions i.e. trips that are passing the site and are not new trips that originate or end at the project site to estimate the project's trip generation for traffic analysis. This trip reduction has not been used in the VMT analysis but has been used for the project's traffic analysis. The VMT is estimated from the regional travel demand model which uses population and employment inputs. Therefore, the trip and VMT reduction have been estimated using sperate methodologies and do not assume double-counting. However, the trip generation characteristics also demonstrate that a multi-family development with mixed-uses and access to shopping facilities will result in reduced vehicular travel. Similarly, Measure T-15 Limit Residential Parking Supply has been used because the project uses a Shared Parking Analysis to provide parking supply based on peak demand. This measure allows a maximum VMT reduction of up to 13.7% and the project would achieve 1.23% reduction using this measure. The project does not reduce the parking supply to an extent that would create a parking deficiency at the site. Therefore, the project would achieve VMT and trip reduction goal consistent with the City's Goal C-3. No change or addition to the environmental analysis is required as a result of this comment.

I16-72 The comment asserts the project is not consistent with General Plan Goal C 7. However, as stated in Table 4.10-2, General Plan Land Use Consistency Analysis, the proposed project would construct 1.3 miles of pedestrian and bike trails that would connect the project site to surrounding area. Additionally, consistent with Santa Clarita Municipal Code Section 17.51.050, the project would integrate nighttime lighting throughout the project site to increase safety and enjoyment. Moreover, the project proposes a mix of uses including multifamily residential units, a senior care facility, as well as commercial and recreational space. No change or addition to the environmental analysis is required as a result of this comment.

I16-73 The comment asserts the project is not consistent with Goal N 1. This comment is similar to Comment I16-69. See Response to Comment I16-69.

I16-74 The comment raises concern for off-site traffic noise. This comment is similar to Comment I16-69. See Response to Comment I16-69.

I16-75 The comment asserts the project would result in significant impacts related to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environment effect. As demonstrated throughout the analysis contained in Table 4.10-2, General Plan Land Use Consistency Analysis, the proposed project would be partially consistent or consistent with all of the goals, objectives, and policies identified in the City's General Plan. Where the project has the potential to result in conflicts with applicable goals adopted for the purpose of avoiding or mitigating an environmental effect, mitigation measures were identified to demonstrate the potential impacts could be reduced to less than significant levels. As such, the identified inconsistencies would not result in a conflict the City's General Plan. Therefore, impacts would be less than significant with mitigation (Draft EIR, p. 4.10-57). No change or addition to the environmental analysis is required as a result of this comment.

I16-76 The comment asserts potential impacts related to land use and planning would occur associated with the import of soil to the project site. The comment is similar to Comment I16-36. See Response to Comment I16-36.

I16-77 The comment asserts potential impacts related to mineral resources would occur associated with the import of soil to the project site. The comment is similar to Comment I16-36. See Response to Comment I16-36.

I16-78 The comment asserts the Draft EIR does not address current noise levels on site or the surrounding community. The comment also asserts the EIR does not include analysis of future impacts associated with off-site traffic. Lastly, the comment states the EIR repeatedly references an erroneous distance for the closest off-site sensitive receptor of 130 feet to the east.

Section 4.12.1, Noise Environmental Setting, of the Draft EIR presents the results of an ambient noise measurement survey that was completed to characterize ambient noise levels at existing sensitive receivers (residential neighborhoods) adjacent to the project (Table 4.12-2). Ambient noise measurements, by convention, are generally conducted along roadways adjacent to the target sensitive receivers, as roadways are the principal noise source in an urban environment. The ambient noise levels measured at sensitive receivers is then used as the baseline against which project construction

and operational noise levels are compared. Refer to Response to Comment I16-79 for a discussion of ambient noise levels on the project site.

The Draft EIR in Section 4.12-4 (Pp. 4,12-16 to 4.12-18) provides analysis of project-related traffic noise increases for roadways to which the project would principally contribute trips and concludes that increases in traffic noise from the project contributions to traffic would remain less than significant.

There is one erroneous reference of 130 feet to the closest sensitive receiver, just below Table 4.12-7. However, as presented in Table 4.12-8, Estimated Construction Noise Levels at Existing Off-Site Sensitive Receptors, this erroneous distance reference was not used in the calculation of construction noise levels at sensitive receivers in the project vicinity (minimum distances of 50 and 100 feet were used for the closest off-site receivers). Using accurate distances from future construction activities to adjacent sensitive receivers, Table 4.12-8 identifies potential noise levels at existing off-site sensitive receptors in the project site's vicinity. As shown, R1 captures the existing residences to the north of the project site (including the mobile home park). Given this, no change or addition to the environmental analysis is required as a result of this comment.

I16-79 The comment asserts the Draft EIR does not contain analysis of project impacts on the project site, particularly in relation to future on-site traffic noise exposure levels. Moreover, the comment asserts the EIR does not include analysis of noise-related impacts to the surrounding area and also relies upon insufficient ambient noise monitoring data to establish the ambient noise environment for the project site and adjacent sensitive receivers.

CEQA does not require analysis of how existing environmental factors affect a project. Rather, a CEQA analysis determines how a proposed project will affect the environment. Accordingly, Section 4.12, Noise, of the Draft EIR was not required to, and did not, analyze the exposure of future project residents to traffic noise levels associated with Interstate 5 (I-5) or Wiley Canyon Road adjacent to the project. Current case law supersedes CEQA Guidelines Section 15126.2 referenced by the commenter.

Section 4.12-4 (Impact Analysis, Noise) of the Draft EIR identifies impacts from on-site activities of the project (including construction and operation) at adjacent sensitive receivers. For example, the project would result in significant and unavoidable impacts related to construction noise. Although mitigation measures MM-NOI-1 and MM-NOI-2 were incorporated to reduce impacts, construction noise impacts would remain significant until construction is complete. All other noise-related impacts were determined to be less than significant, as further described in Section 4.12 of the Draft EIR.

Ambient noise level measurements were conducted adjacent to sensitive receivers in the project vicinity, generally along Wiley Canyon Road. Since Wiley Canyon Road is immediately adjacent to such sensitive receivers, and I-5 is located more distant, the ambient noise measurement results are considered reasonably representative of noise levels at these adjacent receivers. The project itself will introduce multiple rows of multi-level structures on the project site, between I-5 and the residences along the east side of Wiley Canyon Road. Wiley Canyon Road traffic will therefore remain the principal contributor to post-project noise levels for residents along the eastern side of Wiley Canyon Road. Short-term noise measurements with a duration of 15 minutes are typically deemed adequate for characterization of ambient conditions in environments strongly influenced by heavily traveled roadways, as is the case for sensitive receivers in the project vicinity.

I16-80 The comment raises concern over exterior noise standards and the potential for the project to result in exceedances of such standards. The comment correctly identifies that the ambient noise measurement results at 3 of the 5 sensitive receiver locations exceeds the HUD daytime standard of 65 dBA L_{eq} (Table 4.12-2). However, as concluded in Section 4.12-4 (Impact Analysis), of the Draft EIR, on-site project operational noise would not cause any increase in the measured ambient noise levels at these sensitive receivers, and therefore no exacerbation of standards exceedance would occur from on-site project operations. As also concluded in Section 4.12-4, project-related traffic noise increases on studied roadways would not be perceptible to area residents (an increase of 3 dBA is considered barely perceptible, project traffic noise levels increases would be no greater than 1.3 dBA). The commenter points out that project-related traffic noise increases for I-5 and Wiley Canyon Road were not analyzed in Section 4.12-4, thereby the Draft EIR fails to disclose traffic noise impacts for the vicinity sensitive receivers. The commenter asserts the project would increase traffic volumes on I-5 by 30%, which is not accurate. As analyzed in the project Traffic Studies (Appendix K-2 and K-3 of the DEIR), the project would increase traffic volumes along I-5 adjacent to the project site by 15% (3,488 ADT added to baseline of 22,279 ADT); for the segment of Wiley Canyon Road adjacent to the project site, traffic volumes would increase from 8,700 to 12,188 (a 40% increase) as a result of project contributions. However, for a 3 dBA increase to occur, a doubling of traffic volumes on a roadway (a 100% increase) would be necessary. Therefore, project-related traffic noise increases would be less than significant. The commenter asserts that noise impacts from cumulative traffic volumes are not disclosed for sensitive receivers in the project vicinity. However, the project traffic trip contribution to cumulative traffic levels on area roadways would represent a smaller increase than when compared to existing traffic volumes on these roadways. Consequently, the project trip contribution to I-5 and all studied roadway segments in the sub-region would result in less than significant traffic noise exposure level increases for vicinity residents.

I16-81 The commenter's assertion that buildings on the project site which exceed the height of a soundwall along the freeway could increase noise levels for nearby off-site sensitive receivers is not accurate. While some freeway noise may be reflected back toward the freeway from the project building facades facing the freeway, the shielding of freeway noise by the buildings for sensitive receivers to the east of the project site would reduce residual noise levels at these receivers. With the freeway corridor (at a width of approximately 200 feet), sound reflected back would not increase the existing freeway noise along the west side of the I-5.

I16-82 The comment asserts potential noise impacts would occur associated with the import of soil to the project site. The comment is similar to Comment I16-36. See Response to Comment I16-36.

I16-83 The comment asserts potential impacts related to population and housing would occur associated with the import of soil to the project site. The comment is similar to Comment I16-36. See Response to Comment I16-36. Specifically for impacts related to population and housing, the Draft EIR includes analysis on employment growth during construction and operations. Construction personnel, such as workers transporting soil import to the project site would be required. However, construction employment is not anticipated to generate population growth in the City. The need for construction workers would be accommodated within the existing and future labor market in the Los Angeles metropolitan area, which is highly dense and supports a diversity of construction firms and personnel. If construction workers live outside of the City or Los Angeles County, these workers would likely commute during the relatively short and finite construction period, which is anticipated to begin in the

first quarter of 2025 and conclude in the first quarter of 2027. For these reasons, construction would not induce substantial employment and/or population growth in the area, and construction impacts would be less than significant. No mitigation is required (Draft EIR, p. 4.13-5). Once construction is complete, the project would not require imported soil. No operational impacts would occur.

I16-84 The comment asserts significant impacts would occur related to increases in police protection services. The analysis contained in the Draft EIR is based on communication with the Los Angeles County Sheriff's Department (LASD). As detailed further in Section 4.14, Public Services, LASD does not currently have a standard law enforcement service ratio because staffing needs vary from station to station. Although emergent and priority calls are within the LASD response standard, routine calls are slightly over the LASD response standard. According to LASD, the project would not necessitate the construction of new police protection facilities. Furthermore, pursuant to the Santa Clarita Municipal Code Section 17.51.01(B), the project's developer would be required to pay a law enforcement facilities fee, which would allow the station to acquire additional law enforcement service personnel and equipment to ensure that LASD is able to maintain an adequate level of service to the area. The project would also generate tax revenues from the property taxes, a portion of which would be allocated to maintain adequate sheriff station staffing and equipment levels. Furthermore, the project would comply with state and local regulations by providing adequate lighting for recreational amenities and improved open space areas as well as along pedestrian pathways, circulation ways, paths of egress, and within parking lots. These design elements would increase safety and decrease the likelihood of crime occurring (Draft EIR, p. 4.14-11). Given this, no change or addition to the environmental analysis is required as a result of this comment.

I16-85 The comment asserts potential impacts to public services would occur associated with the import of soil to the project site. The comment is similar to Comment I16-36. See Response to Comment I16-36.

I16-86 The comment asserts the on-site recreational uses would be impacted due to air pollution and noise; thus, off-site recreational uses would be impacted as a result of the project's residents and employees. As further detailed in Section 4.15, Recreation, the project would also not result in substantial, unplanned population, employment, or housing growth. Growth on the project site is anticipated and would not lead to unplanned growth that would lead to the substantial deterioration of existing parks and recreational facilities. Moreover, the project developer/applicant would be required to pay a developer fee related to parks and recreation pursuant to the Quimby Act. This would allow the City to continue to provide adequate park and recreational services (Draft EIR, p. 4.15-5). Regarding air quality and noise impacts on-site recreational uses, this comment is similar to Comment I16-32 and Comment I16-79. See Response to Comments I16-32 and I16-79 for more discussion on air quality and noise impacts on site. Given this, no change or addition to the environmental analysis is required as a result of this comment.

I16-87 The comment asserts potential impacts related to recreation would occur associated with the import of soil to the project site. The comment is similar to Comment I16-36. See Response to Comment I16-36.

I16-88 The comment raises concern for the VMT reduction methodology and analysis by using the project's VMT reducing features. See response to comment I16-71 above.

I16-89 The comment raises concern for the VMT reduction methodology and analysis by using the project's VMT reducing features. See response to comment I16-71 and Topical Response No.1 – Parking Plan.

I16-90 The comment asserts potential impacts related to transportation would occur associated with the import of soil to the project site. The comment is similar to Comment I16-36. See Response to Comment I16-36.

I16-91 The comment asserts potential impacts to tribal cultural resources would occur associated with the import of soil to the project site. The comment is similar to Comment I16-36. See Response to Comment I16-36.

I16-92 The comment states Chiquita Canyon Landfill only allows municipal waste. Moreover, the comment raises concern for odors at this landfill. Thus, the comment asserts a significant impact would occur related to solid waste. Section 4.18, Utilities and Service Systems, identifies Chiquita Canyon Landfill as an option for project-related solid waste to be disposed of in the unlikely event that the Sunshine Canyon Landfill closes or reaches capacity before the full buildout of the project. Furthermore, the project would generate 0.022% of the daily permitted capacity at the landfill (Draft EIR, p. 4.18-13). Due to the insignificant contribution to overall solid waste capacity, the analysis within the Draft EIR remains as discussed. Moreover, the City will review building plans and ensure that proper space is set aside to allow for the collection and storage of recyclable materials before issuance of building permits to ensure that there is adequate space for recycling on the project site. Overall, impacts associated would remain less than significant, and no mitigation is required. Given this, no change or addition to the environmental analysis is required as a result of this comment.

Regarding odors from the Chiquita Canyon Landfill, this comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. The condition of the landfill is not under the control of the applicant. No response is required.

I16-93 The comment asserts potential impacts to utilities and service systems would occur associated with the import of soil to the project site. The comment is similar to Comment I16-36. See Response to Comment I16-36.

I16-94 The comment asserts potential impacts related to wildfire would occur associated with the import of soil to the project site. The comment is similar to Comment I16-36. See Response to Comment I16-36.

I16-95 The comment asserts the project would result in significant impacts to or related to aesthetics, air quality, biological resources, land use and planning, noise, public services, transportation, and utilities and service systems. As demonstrated in Responses to Comment Letter I16, no new environmental impact has been identified nor would an increase in the severity of a previously identified significant impact occur as a result of Comment Letter I16. As such, the comments do not warrant recirculation of the Draft EIR. Therefore, as detailed in the Draft EIR, only one significant and unavoidable impact would occur and Alternatives 1 through 4 were identified by the City as a reasonable range of alternatives to the proposed project.

Additionally, the comment correctly notes impacts under Alternative 2 would increase for the following environmental topic areas: greenhouse gas emissions, population and housing, public services, recreation, transportation, and utilities and service systems. The comment also notes Alternative 3

would not meet some of the project objectives and Alternative 1 and 4 would eliminate the significant and unavoidable impact related to construction noise. The comment raises concern for Alternative 4's ability to meet all the project objectives. This comment is similar to Comment I16-10. See Response to Comment I16-10. Given the above, no change or addition to the environmental analysis is required as a result of this comment.

I16-96 The comment asserts an alternate site could have been evaluated in the Draft EIR. The comment identifies sites. The project applicant, however, does not control these sites. Accordingly, an alternative site is not relevant to this analysis. Additionally, as stated in CEQA Guidelines Section 15126.6(f)(2)(A), the key question and first step in analyzing alternative sites is whether any of the significant effects of a project would be avoided or substantially lessened by putting that project in another location. Only locations that would avoid or substantially lessen any of the significant effects of a project need to be considered in the EIR. The project would result in significant and unavoidable impacts related to construction noise, which is tied to the project's proposed senior living component. Nonetheless, this comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

I16-97 The comment provides a summary statement and requests recirculation of the Draft EIR. As demonstrated in Responses to Comment Letter I16, no new environmental impact has been identified nor would an increase in the severity of a previously identified significant impact occur as a result of Comment Letter I16. The comments do not warrant recirculation of the Draft EIR.

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Response to Comment Letter I17

Linda Bateman
April 11, 2024

I17-1 The comment raises concern for the air quality and dust during construction. The Draft EIR analyzes air quality impacts within Section 4.2, Air Quality. Dust is typically captured within discussions on particulate matter. Particulate matter air pollution is a mixture of solid particles and liquid droplets found in the air (Draft EIR, p. 4.2-8). Some particles, such as dust, dirt, soot, or smoke, are large or dark enough to be seen with the naked eye, while other particles are so small they can only be detected using an electron microscope. Particles are defined by their diameter for air quality regulatory purposes: inhalable particles with diameters that are generally ten micrometers (µm) and smaller (PM_{10}); and fine inhalable particles with diameters that are generally 2.5 µm and smaller ($PM_{2.5}$). For the purposes of the environmental analysis, project construction activities were estimated by assuming a conservative scenario and applying the mobile source and fugitive dust emissions factors. As a result of air quality modeling (included in Appendix B of the Draft EIR), the project would not exceed South Coast Air Quality Management District (SCAQMD) thresholds of significance. Thus, impacts would be less than significant.

Additionally, the project would be required to comply with existing rules and regulations, including SCAQMD Rule 403, Fugitive Dust, which requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM_{10} emissions to less than 50 micrograms per cubic meter (µg/m3) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures. Additional measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities. Fugitive dust control measures are not considered mitigation under CEQA because they are regulatory compliance. For more discussion regarding dust-related impacts, see Section 4.2 of the Draft EIR. No change or addition to the environmental analysis included in the Draft EIR is required.

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Response to Comment Letter I18

Deborah Karloff
April 11, 2024

I18-1 The comment raises concern for the number of parking provided on site. In addition, the comment raises concerns for parking on adjacent streets to the north. Regarding parking, see Topical Response No. 1 – Parking Plan for more discussion. No change to the content or analyses in the Draft EIR are required as a result of this comment.

I18-2 The comment raises concern for the project's proposed height. The project would result in the redevelopment of a vacant underutilized site to construct buildings not to exceed 50 feet in height, consistent with the City's MX-N zone. Although the proposed building heights are not the same as adjacent structures, the project would comply with the City's General Plan and zoning regulations related to height. As shown in Figure 3-4b, Tentative Tract Map, the multifamily residential buildings would include 2- and 3-story buildings along the site's edge and include 4-story buildings in the center of the site. Given this, no change or addition to the environmental analysis included in the Draft EIR is required.

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Response to Comment Letter I19

TimBen Boydston
April 12, 2024

I19-1 The comment requests confirmation of receipt. As demonstrated through this Final EIR and responses to comments, the comment was included. No further response is required.

I19-2 The comment raises concern for the project's proposed improvements to Wiley Canyon Road. The comment notes past planning efforts for four lanes on the existing roadway. As discussed in the Draft EIR, Wiley Canyon Road is designated by the General Plan as a Secondary Highway, which is a four-lane road configuration, along the project frontage. However, the proposed project improvements would maintain a two-lane roadway configuration. For more discussion regarding traffic and circulation, see Topical Response No. 3 – Traffic and Circulation.

I19-3 The comment asserts traffic counts and potential impacts to Lyons Avenue need to be included in the environmental analysis. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. However, for informational purposes, the Draft EIR includes analysis of the project's potential to impact Lyons Avenue at multiple points. In fact, the study area, as illustrated in Figure 1-1 of Appendix K-5, includes the following intersections with Lyons Avenue: I-5 Southbound On-Ramp & Pico Canyon Road/Lyons Avenue (Unsignalized), I-5 Northbound Ramps & Lyons Avenue (Signalized), Wiley Canyon Road & Lyons Avenue (Signalized). Given this, the existing average daily traffic volumes in the study area were considered in the environmental analysis. Furthermore, as demonstrated in Section 4.16, Transportation, of the Draft EIR, the project would include improvements to Caltrans facilities in the study area, including the northbound ramp to the I-5 freeway at Lyons Avenue, in which the project applicant would pay its fair share towards traffic signal adjustment/retiming. No change or additions to the analysis in the Draft EIR are required as a result of this comment.

I19-4 The comment raises concern for traffic along Wiley Canyon Road in connection with Golden Valley and Via Princessa. Only an easterly extension of Via Princessa to Golden Valley Road is proposed in the Princessa Crossroads Development Project EIR. This connection will facilitate westbound traffic to use the SR-14 interchange via Golden Valley Road. The extension of Via Princessa to Golden Valley Road would not affect traffic distribution along the short segment of Via Princessa which connects to Wiley Canyon Road from Claibourne Lane nor increase cut-through traffic along Wiley Canyon Road near the project. Additionally, the project's traffic study includes an analysis of Existing and Interim Year per requirements of the City's guidelines and provides recommendations to improve traffic operations along Wiley Canyon Road.

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Response to Comment Letter I20

Craig Nagasugi
April 12, 2024

I20-1 The comment expresses opposition to the proposed project and notes past planning efforts for four lanes on Wiley Canyon Road. As discussed in the Draft EIR, Wiley Canyon Road is designated by the General Plan as a Secondary Highway, which is a four-lane road configuration, along the project frontage. However, the proposed project improvements would maintain a two-lane roadway configuration. For more discussion regarding traffic and circulation, see Topical Response No. 3 – Traffic and Circulation. The comment also raises concerns for impacts to quality of life and public safety without improvements to Wiley Canyon Road as planned. The project includes improvements to Wiley Canyon Road, including the installation of roundabouts. Although CEQA Guidelines Section 15064.3 states that traffic delay using level of service (LOS) metric is no longer considered a significant environmental impact under CEQA, a summary of project's traffic analysis using the LOS metric is provided in Appendix K-5 of the Draft EIR. An operational analysis of intersections was conducted, in which two intersections (I-5 Southbound at Calgrove Boulevard and I-5 Northbound at Calgrove Boulevard) would be significantly affected during the existing plus project condition, among others during the interim year cumulative scenario. The project would construct or pay its fair-share towards improvements required to reduce operational deficiencies, including improvements to Wiley Canyon Road (Appendix K-5). These improvements would be included as conditions of approval for the project. Given this, the project would be required to comply with City requirements to reduce impacts associated with the project. Moreover, the design of Wiley Canyon Road would provide traffic calming in accordance with City standards. No change to the analysis in the Draft EIR is required as a result of this comment. This comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

I20-2 The comment requests the project applicant's political contributions. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I20-3 This comment is similar to Comment I20-1. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no response is required.

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Response to Comment Letter I21

Deborah Karloff
April 12, 2024

I21-1 This comment states that the Draft EIR does not properly analyze the potential of wildlife movement using culverts under Interstate 5 that convey flows from upstream portions of the South Fork of the Santa Clara River and from Lyons Canyon. As stated in section 4.3.1.2 of the Draft EIR, the project site does not represent significant corridors for wildlife movement to and from adjacent sites; however, it did recognize that the South Fork of the Santa Clara River onsite is a regional wildlife movement corridor and it does state that a majority of this area would be maintained and the project proposes to widen the existing channel to create additional riparian habitat. The river is a concrete sided and bottomed channel in the northern portion of the project site upstream and that condition continues downstream of the project for approximately 1.6 miles. As for the culvert beneath Interstate 5, the culvert is approximately 665 feet in length and is beneath a highly used roadway. The culvert begins on the upstream end from a concrete-sided and bottomed channel that continues for 2,000 feet to the south (upstream) and is adjacent to Interstate 5, the Calgrove Boulevard on- and off-ramps, and commercial businesses that are fenced. The Calgrove Boulevard underpass beneath Interstate 5 would be expected to support more larger, terrestrial wildlife movement from east to west due to its height and width, while avoiding the exposure of the concrete channel. The culvert in question runs beneath Interstate 5 for almost 400 feet and exits into a concrete-sided and bottomed channel within a fenced in area adjacent to residential properties. It continues as a concrete-sided and bottomed channel before it reaches the project site. As such, wildlife movement through this connection is expected to be low. Therefore, further analysis of these culverts is not warranted.

I21-2 This comment states that project is insufficient in its proposed ground water infiltration and criticizes the loss of riparian habitat. As stated in Section 4.9, Hydrology and Water Quality, of the Draft EIR, the three drainage detention basins would provide an ability for the majority of runoff of the proposed developed areas to infiltrate onsite, so the removal of the permeable surfaces is not expected to lead to a decrease in water infiltration. As stated in Section 4.3, Biological Resources, of the Draft EIR, MM-BIO-5 would provide for 2:1 restoration of riparian habitat.

I21-3 The comment represents a statement summarizing the comments included in Comment Letter I21. No further response is required.

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Response to Comment Letter I22

Ed Bersntein
April 13, 2024

I22-1 The comment notes an attached letter, below. No response is required.

I22-2 The comment is an introductory statement identifying the commenter. No response is required.

I22-3 The comment raises concern for planned improvements to Wiley Canyon Road. As discussed in the Draft EIR, Wiley Canyon Road is designated by the General Plan as a Secondary Highway, which is a four-lane road configuration, along the project frontage. However, the proposed project improvements would maintain a two-lane roadway configuration. For more discussion regarding traffic and circulation, see Topical Response No. 3 – Traffic and Circulation.

I22-4 The comment raises safety concern related to traffic generated by the proposed project. Although CEQA Guidelines Section 15064.3 states that traffic delay using level of service (LOS) metric is no longer considered a significant environmental impact under CEQA, a summary of project's traffic analysis using the LOS metric is provided in Appendix K-5 of the Draft EIR. An operational analysis of intersections was conducted, in which two intersections (I-5 Southbound at Calgrove Boulevard and I-5 Northbound at Calgrove Boulevard) would be significantly affected during the existing plus project condition, among others during the interim year cumulative scenario. As such, the project would construct or pay its fair-share towards improvements required to reduce operational deficiencies, including improvements to Wiley Canyon Road (Appendix K-5). These improvements would be included as conditions of approval for the project. Given this, the project would be required to comply with City requirements to reduce impacts associated with the project. In addition to off-site improvements to Wiley Canyon Road, the project would include improved sidewalks along the western edge and the southern portion of the project site (Draft EIR, p. 3-10). This would facilitate improved circulation between the project site and its surrounding vicinity when compared to existing conditions. Construction of these planned improvements would be in compliance with all applicable City regulations governing streets, sidewalks, and public access. Moreover, the project would include 1.3 miles of new pedestrian trails and sidewalks along the eastern perimeter of the site, which would connect the site's public amenities to the surrounding community. Directional signage would be used to promote walkability on site. Additionally, the project would include off-site roadway and lighting improvements which would enhance safety. Given this, the Draft EIR adequately addresses the comment's concerns.

I22-5 The comment raises concern related to wildlife corridors associated with the South Fork of the Santa Clara River. The comment notes the Santa Monica Mountains Conservancy (Comment Letter A7) identified similar concerns. The comment suggests a reduction in the project's size in order to protect biological resources, including oak trees.

As stated in section 4.3.1.2 of the Draft EIR, the project site does not represent significant corridors for wildlife movement to and from adjacent sites; however, it did recognize that the South Fork of the Santa Clara River onsite is a regional wildlife movement corridor and it does state that a majority of this area would be maintained and the project proposes to widen the existing channel to create additional riparian habitat. The river is a concrete sided and bottomed channel in the northern portion of the

project site upstream and that condition continues downstream of the project for approximately 1.6 miles. As for the culvert beneath Interstate 5, the culvert is approximately 665 feet in length and is beneath a highly used roadway. The culvert begins on the upstream end from a concrete-sided and bottomed channel that continues for 2,000 feet to the south (upstream) and is adjacent to Interstate 5, the Calgrove Boulevard on- and off-ramps, and commercial businesses that are fenced. The Calgrove Boulevard underpass beneath Interstate 5 would be expected to support more larger, terrestrial wildlife movement from east to west due to its height and width, while avoiding the exposure of the concrete channel. Therefore, further analysis of the culvert is not warranted.

Regarding oak trees, the comment specifically requests no oak trees be removed along the proposed improvements to Wiley Canyon Road. As further detailed in Section 4.3, Biological Resources, the City includes regulations within Municipal Code Section 17.17.090, which designates all native oak trees as protected trees in the City. A total of 24 trees were identified as off-site oak trees. See Appendix C-3, Oak Tree Report, for more discussion.

I22-6 The comment raises concern regarding right-of-way. As part of the proposed project, the dedication and acquisition of right-of-way necessary for all street improvements identified in the Traffic Study (Appendix K of the EIR) is included in the conditions of approval. Specifically, right-of-way dedication and acquisition is required before final map approval or grading permit, whichever comes first, to ensure all necessary roadway improvements can be constructed.

I22-7 The comment asks about the costs of implementing planned improvements to Wiley Canyon Road. As described in Chapter 3, Project Description, of the Draft EIR, the project includes off-site improvements to Wiley Canyon Road, which are designed to improve roadway conditions and operation. All planned improvements are only able to proceed following the approval of the project. Appendix K5, Traffic Analysis, states the improvements are identified to address different traffic scenarios: existing plus project conditions and cumulative conditions in the interim year. Improvements identified to improve existing plus project conditions would be paid by the applicant. The project's impact contribution to the interim year varies and costs would be shared with the City or Caltrans, as applicable. The project would either construct or pay (100% or its fair-share) towards construction of the intersection improvements identified in Appendix K-5. The payment mechanism for the identified improvements would be determined in consultation with the City and coordination with Caltrans. No improvements have been identified to increase the capacity of Wiley Canyon Road. Therefore, the comment's request for a bond is not applicable to the proposed project.

Regarding traffic impacts associated with these planned improvements, although CEQA Guidelines Section 15064.3 states that traffic delay using LOS metric is no longer considered a significant environmental impact under CEQA, implementation of proposed improvements would reduce operational deficiencies (see Appendix K-5). Noise impacts during construction would be significant and unavoidable even with the implementation of mitigation measures, as further detailed in Section 4.12, Noise, of the EIR. Noise impacts during operations would be less than significant.

I22-8 The comment asks about accessibility standards along Wiley Canyon Road. Implementation of planned improvements would be subject to existing regulations and policies related to accessibility standards for people with disabilities. New sidewalks developed under the project would comply with City standards outlined in the Santa Clarita Municipal Code and confirmed by the appropriate reviewing department (e.g., Community Development and Public Works). Furthermore, the project would

incorporate project design feature PDF-TRA-5, which would improve pedestrian connectivity by filling in existing gaps along Wiley Canyon Road. Regarding oak trees, the Draft EIR identified 24 oak trees that are located off-site and within the project's planned roadway improvements. None of the surveyed trees associated with this portion of the project qualify for heritage status. All of these trees would be impacted as a result of the project. As such, an Oak Tree Permit as required by the City would require replacement of trees removed or encroached upon. For more information on the type of replacement trees proposed, see Appendix C2 for discussion.

I22-9 The comment raises concerns for noise generated on Wiley Canyon Road. Once operational, the proposed project is anticipated to result in less-than-significant impacts related to traffic noise. Section 4.12, Noise, of the EIR where a discussion is provided that shows operational noise along Wiley Canyon Road would not result in significant noise impacts to the project. Furthermore, noise from emergency work, such as warning devices on emergency vehicles is exempt from the City's noise regulations (see Section 11.44.100 of the Santa Clarita Municipal Code).

I22-10 The comment objects to the proposed buildings' height and aesthetics compared to the surrounding community. Section 4.1, Aesthetics, of the EIR includes a consistency analysis with the Community Character and Design Guidelines for which the proposed project was determined to not conflict with existing City policies governing aesthetics. Furthermore, the project is subject to Section 17.55.040, Architectural and Design Standards, of the Santa Clarita Municipal Code, which requires review on the buildings' height. Based on the site's existing zoning, the proposed height is in compliance. Therefore, impacts were found to be less than significant. The comment's request for a reduced building height will be provided to the City's decision makers for review of this Final EIR.

I22-11 The comment states traffic noise and aesthetic impacts would reduce property values for the adjacent neighborhood. CEQA Guidelines Section 15064(e) states, "economic and social changes resulting from a project shall not be treated as significant effects on the environment." The commenter's concern for property values does not pertain to the project's impacts on the environment pursuant to CEQA.

I22-12 The comment raises concern for traffic and emergency vehicles as a result of the project. The analysis contained within the EIR states the project would be adequately served by fire protection services (see Section 4.14, Public Services). While the project may result in an increase in demand, the project would not require the LACFD to construct or expand existing fire stations in order to adequately serve the project site. Along with compliance with all applicable provisions of state and local fire codes, the project applicant would be required to pay development fees established by the fire department, which would offset the costs of additional resources needed to serve the project and the service area (Draft EIR, p. 4.14-10).

Additionally, the project site is located within and adjacent to land identified as a Very High Fire Hazard Severity Zone. Redevelopment of the project site would include fuel modification and defensible space for fire prevention and safety, which is required by existing regulations. The EIR analyzes the project's potential to exacerbate wildfire risk (see Section 4.19, Wildfire), in which impacts were determined to be less than significant.

The project includes the construction and operation of a new senior living facility, which would be supported by on-site amenities for basic-needs nursing care. In the event ambulances are required, emergency services would utilize existing routes and as discussed above, the EIR determined the

project would not impact service ratios or response times. Moreover, although CEQA Guidelines Section 15064.3 states that traffic delay (LOS) is no longer considered a significant environmental impact under CEQA, the project's effect on traffic would be reduced upon the implementation of proposed improvements (see Appendix K-5).

The comment provided suggests that a reduced project alternative is required to address project impacts. As demonstrated above, in accordance with existing CEQA Guidelines, the project would not result in significant impacts related to public services, wildfire, or transportation. The Draft EIR analyzes various alternatives to the proposed project. Notably, Alternative 4, Construction Noise Setback, would result in a development scale that it less than the project as proposed. As such, this comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

I22-13 The comment raises concern for flood hazards on the project site. The EIR states the project site is mapped within a potential flood zone, which could impact the proposed project. As such, the EIR identified MM-HYD-1, which would implement physical measures to address hydrologic or hydraulic characteristics of the site along with regulatory compliance measures. For example, the project proposes soil cement bank protection improvements along the banks of the South Fork of the Santa Clara River (also referred to as Wiley Creek). Implementation of MM-HYD-1 would reduce impacts to a less than significant level. Regarding groundwater recharge, redevelopment of the project site would decrease pervious surfaces compared to existing conditions. However, the proposed project includes the construction of three drainage detention basins, which would provide an ability for the majority of runoff to infiltrate onsite. As such, implementation of the project is not anticipated to substantially interfere with groundwater recharge.

I22-14 The comment raises concern for liquefaction as a result of the project. The Draft EIR analyzes potential impacts associated with geotechnical hazards and seismic-ground failure, such as liquefaction. The EIR discloses the project site is susceptible to liquefaction; however, the improvements proposed on site would be required to comply with applicable regulations such as those within the California Building Standards Code. Before construction of the proposed project, a final design level project-specific geotechnical report would be required to minimize the potential for structural damage cause by seismic-related ground failure. Thus, the incorporation of recommended design measures such as site preparation and foundation design measures would reduce impacts to a less-than-significant level.

I22-15 The comment objects to the estimates provided in the Traffic Analysis, included as Appendix K to the Draft EIR. The analysis appended to the EIR was prepared with accurate assumptions of the project's proposed land uses and future conditions. Moreover, the CEQA Guidelines Section 15064.3 states that traffic delay is no longer considered a significant environmental impact under CEQA. The EIR includes analysis within Appendix K to demonstrate the project's effect on traffic would be reduced upon the implementation of proposed improvements. For more discussion, see Topical Response No. 3 – Traffic and Circulation.

I22-16 The comment raises concern for air quality impacts on nearby residences. Section 4.2, Air Quality, of the Draft EIR, details the methodology for assessing impacts under CEQA. As discussed, construction air quality impacts are assessed on a regional level by analyzing the incremental increase in emissions compared to baseline conditions. In addition, construction air quality impacts on a localized level are assessed through the analysis of fugitive dust emissions, for example (Draft EIR, pp. 4.2-25 through 4.2-26). The analysis presented in Section 4.2 demonstrates that less than significant impacts would

occur with mitigation measure MM-AQ-1 incorporated. MM-AQ-1, Construction Equipment Features, requires the project to utilize off-road diesel-powered construction equipment that meets or exceeds CARB and USEPA Tier 4 Final off-road emissions standards or equivalent for equipment rated at 50 horsepower or greater during project construction (Draft EIR, p. 4.2-40). Although the identified impact is on a regional level, implementation of this mitigation measure would address the commenter's concern for air quality within the adjacent community.

Regarding the commenter's suggestion for funds to provide for air filters and solar panel cleaning, the Draft EIR states the project would include dust control measures required by the SCAQMD via Rule 403, Control of Fugitive Dust, and Rule 1113, Architectural Coatings. As shown in Table 4.2-8, construction-related localized emissions would not exceed the SCAQMD localized significance thresholds (Draft EIR, pp. 4.2-34 and 4.2-35). Therefore, compliance with existing regulations would provide sufficient reduction in fugitive dust emissions from grading, excavation, demolition, and building activities. Given this, no change or addition to the environmental analysis is required as a result of this comment.

I22-17 The comment raises concern for dust impacts related to proposed grading activities. The Draft EIR assumed a construction schedule that was used for air quality modeling. As detailed in Table 3-3, Construction Schedule, Phasing and Trips, within Chapter 3, Project Description, of the Draft EIR, construction activities are assumed to span over an approximately 24-month period with the grading and excavation phase as a 7-month period. Section 4.2, Air Quality, of the Draft EIR analyzes the potential impacts associated with grading, including impacts related to dust (i.e., particulate matter and fugitive dust). Existing regulations such as SCAQMD Rule 403, Control of Fugitive Dust, reduce fugitive dust emissions. Moreover, the CalEEMod results determined less than significant impacts would occur with mitigation measure MM-AQ-1 incorporated. Therefore, compliance with existing regulations and the incorporation of mitigation measures would provide sufficient reduction in fugitive dust emissions from grading and excavation. Given this, no change or addition to the environmental analysis is required as a result of this comment.

I22-18 The comment notes an attached letter, below. No response is required.

I22-19 The comment expresses opposition to the proposed project, specifically towards the proposed improvements along Wiley Canyon Road. The comment raises concern for safety implications on Wiley Canyon Road for public services and the general public. As described in Chapter 3, Project Description, of the Draft EIR, redevelopment of the project site would include off-site circulation improvements to Wiley Canyon Road (Draft EIR, p. 3-10). This would facilitate improved circulation between the project site and its surrounding vicinity when compared to existing conditions. Construction of these planned improvements would be in compliance with all applicable City regulations governing streets, sidewalks, and public access. Furthermore, the Draft EIR analyzes the environmental impacts related to safety and circulation within Section 4.10, Land Use and Planning, and Section 4.16, Transportation. As noted in the comment, the following comments further describes the specific concerns.

I22-20 This comment discusses roadways that are not immediately adjacent to the project site, including Wabuska, Calgrove, Via Princessa, the 14 Freeway, the I-5, Sierra Highway, Newhall, Railroad, Lyons, Soledad Canyon, and Valencia. This comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I22-21 The comment describes a brief history of Wiley Canyon Road and raises concern for traffic under existing conditions. This comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I22-22 This comment discusses, and includes photos of, projects and improvements near and adjacent to the project site relative to a future potential widening of Wiley Canyon Road. This comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I22-23 This comment is the same as Comment Letter I2. See Response to Comment Letter I2 for more details. No further response is required.

I22-24 The comment notes that the opposition to the project is not towards the creation of jobs within the City. Instead, the comment expresses opposition to the project's proposed improvements to Wiley Canyon Road. The comment regarding Wiley Canyon Road's designation is acknowledged. As discussed in the Draft EIR, Wiley Canyon Road is designated by the General Plan as a Secondary Highway, which is a four-lane road configuration, along the project frontage. However, the proposed project improvements would maintain a two-lane roadway configuration. For more discussion regarding traffic and circulation, see Topical Response No. 3 – Traffic and Circulation.

I22-25 The comment raises questions regarding the land uses at the mobile home development (i.e., Mulberry Mobile Home Park) adjacent to the project site. The comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I22-26 The comment raises concern for the development of the project site's vicinity through past planning efforts, including One Valley One Vision. The comment notes concerns for the planned improvements to Wiley Canyon Road. See Topical Response No. 3 – Traffic and Circulation for more discussion. However, the comments regarding land use development within the project site's vicinity is not related to the adequacy or accuracy of the environmental analysis in the Draft EIR and outside of the scope of the required CEQA analysis. As detailed within the Draft EIR, the proposed project is subject to the land use and zoning regulations established at the time the project application was deemed complete. The past development of the area is discussed within various sections of the Draft EIR (e.g., Section 4.4, Cultural Resources). Moreover, as detailed in the Draft EIR, the project as proposed does not conflict with existing land use and zoning regulations for the site. No change or addition to the environmental analysis included in the Draft EIR is required.

I22-27 This comment raises questions about communication with the owner(s) of the mobile home development. In accordance with CEQA Guidelines Section 15087, the City provided a public notice of availability (NOA) of the Draft EIR through more than the required procedures. The City published the NOA in a newspaper of general circulation (i.e., The Santa Clarita Valley Signal), posted the notice on site, and mailed to owners and occupants of properties within a 1,000 foot radius of the parcels on which the project is located. Accordingly, the owners to the mobile home development were notified of the proposed project. However, the comment appears to be related to the concerns for development to the community following prior planning efforts. Given this, the comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I22-28 The comment compares the proposed project's site plan with a plan labeled as "LA County Planning Engineers and City of Santa Clarita One Valley One Vision." The aforementioned plan illustrates an alignment of Wiley Canyon Road bisecting the project site. For additional information, please see Response I22-22.

I22-29 The comment raises concern for the implementation of the General Plan, specifically related to roadway improvements. This comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required. However, for a discussion about Wiley Canyon Road, please see Topical Response 5 – Traffic and Circulation.

I22-30 The comment raises concern for housing buildout projections and associated traffic as a result of ADUs, JADUs, and SB 9 projects within the area. The potential development projections associated with these types of projects are outside of the scope of the required environmental analysis within the Draft EIR. As such, the cumulative analysis does not require this analysis. No change or addition to the environmental analysis included in the Draft EIR is required.

I22-31 The comment raises questions regarding Dockweiler Drive connection and its role in redistribution of traffic in the City. The Dockweiler Drive connection would ascertain the feasibility of the General Plan alignment for Dockweiler Drive, which identifies the connection of Dockweiler Drive to Lyons Avenue at Railroad Avenue. This project would extend Dockweiler Drive Valle De Oro to 13th Street and would improve the 13th Street rail crossing at Railroad Avenue, and is anticipated to reduce cross valley trip lengths and travel times, provide an alternate travel route once the connection is completed. Therefore, a redistribution of east-west traffic would occur in the City which would lead to reduced traffic volumes along Via Princessa and Wiley Canyon Road.

The comment also inquires if any planning document notes reduction in traffic along Wiley Canyon Road. As shown in Table 3.2.4 Existing Level of Service Summary- Arterial Roadways of the One Valley One Vision Draft Program EIR (September 2010), the average existing ADT on Wiley Canyon Road, north of Calgrove Boulevard was 9,000 ADT in the year 2007 and forecasted to 19,000 ADT in the General Plan Buildout scenario. The existing ADT in year 2022 (see Appendix K-2) was observed to be in the range of 8,400 and 9,100 for Wiley Canyon Road, north of Calgrove Boulevard and project access driveway. Therefore, the traffic volumes along Wiley Canyon Road have only increased by 100 ADT (i.e. 1.11%) in the period between 2007 and 2025. Therefore, comparing with historical traffic data, only a nominal increase in traffic volumes has occurred on this segment of Wiley Canyon Road. The ultimate capacity of a two-lane Limited Secondary Highway at LOS E is 18,000 ADT and of a four-lane Secondary Arterial Highway at LOS E is 36,000. With the addition of project trips i.e. 3,488 ADT, the daily traffic volume along Wiley Canyon would be in the range of 11,888 ADT t0 12,588 ADT and will not exceed the threshold of 18,000 ADT.

The comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I22-32 The comment notes that the corridor is described with "very little development anticipated." The comment asks for additional context. This quote is not within the text of the Draft EIR. As such, the comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I22-33 The comment appears to be inquiring the volume of traffic on Wiley Canyon Road to the north of Lyons Avenue and its impact on flow to and from the I-5. The analysis of intersections along Lyons Avenue including Wiley Canyon Road/Lyons Avenue, I-5 Northbound Ramps/Lyons Avenue and I-5 Southbound Ramps/Pico Canyon Road is provided in Appendix K-5. The project would affect the operation of I-5 Northbound Ramps/Lyons Avenue in the Future/Interim Year plus Project conditions and would pay its fair-share towards signal modification required to improve the operation. As such, the comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I22-34 The comment inquires how the future connection of Via Princessa and Wiley Canyon Road would redistribute traffic in the area. See response to comment I46-8 for more details on the Via Princessa connector.

I22-35 The inquires how the redistribution of traffic along Wiley Canyon Road between Wabuska Street and Calgrove Boulevard alleviate traffic concerns in the area and with respect to cross-valley highway and freeway entrance. Appendix K-5 provides a detailed analysis of Existing and Future/Interim Year with and without project conditions.

I22-36 The comment inquires about the use of artificial intelligence and traffic applications in the planning process. The comment appears to be in regard to the planned improvements on Wiley Canyon Road. See Topical Response No. 3 – Traffic and Circulation for more discussion.

I22-37 The comment raises questions about other planned roadway improvements throughout the City (i.e., Bouquet Canyon). The Draft EIR does not include comparative analysis of other projects within the City, as it is not required by CEQA. Instead, the Draft EIR provides analysis of cumulative impacts based on a list of related projects determined by Appendix K, Traffic Impact Analysis, of the Draft EIR, and identified in Table 3-4 of Chapter 3, Project Description. The roadway improvements for Bouquet Canyon Road are associated with another project that was previously analyzed under CEQA, and is not included in the list of related projects. Bouquet Canyon Road improvements were identified based on the traffic analysis for the associated project. In that case, the traffic analysis determined the necessary roadway improvements would address the potential impacts of that project. Similarly, the proposed project, as analyzed in the Draft EIR, conducted traffic impact analysis, which considered the future improvements to Wiley Canyon Road. See Appendix K-5 for more discussion.

I22-38 The comment raises questions regarding planned improvements for Wiley Canyon Road. As discussed in the Draft EIR, Wiley Canyon Road is designated by the General Plan as a Secondary Highway, which is a four-lane road configuration, along the project frontage. However, the proposed project improvements would maintain a two-lane roadway configuration. For more discussion regarding traffic and circulation, see Topical Response No. 3 – Traffic and Circulation.

Furthermore, the comment inquires about the timeframe for projections within the General Plan. The City's General Plan, drafted in June 2011, is intended to serve as a blueprint for development over the next 20 years. This is a typical timeframe for long-range planning documents. However, it is not codified into law. Moreover, the comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I22-39 The comment raises concern for the planned improvements for Wiley Canyon Road and coordination with Caltrans and LA County. The Draft EIR was made available for public review and comment pursuant to CEQA Guidelines Section 15087. At the beginning of the public review period, an electronic copy of the Draft EIR and an electronic copy of the Notice of Completion (NOC) and Notice of Availability (NOA) were submitted to the State Clearinghouse. Relevant State agencies (including Caltrans) received electronic copies of the documents, as well as relevant departments associated with the County of Los Angeles. Moreover, the City has notified Caltrans of the proposed project throughout each stage of the environmental review process (e.g., Notice of Preparation and Notice of Availability). Notably, Caltrans provided a comment on the Draft EIR, included as Comment A4. Moreover, as shown in Comment A4, Caltrans concurred with the findings of the traffic analysis (included as Appendix K). For more discussion, see Response to Comment A4.

I22-40 The comment raises questions regarding the development of the OVOV General Plan. This comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I22-41 The comment raises questions regarding the development of the OVOV General Plan. It should be noted that amendments to General Plan are permissible with the approval from the City Council. However, the proposed project does not include a general plan amendment. As such, this comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I22-42 This comment is similar to Comment I22-29. See Response to Comment I22-29 for more discussion.

I22-43 This comment is similar to Comment I22-30. See Response to Comment I22-30 for more discussion.

I22-44 This comment is similar to Comment I22-31. See Response to Comment I22-31 for more discussion.

I22-45 This comment is similar to Comment I22-32. See Response to Comment I22-32 for more discussion.

I22-46 This comment is similar to Comment I22-33. See Response to Comment I22-33 for more discussion.

I22-47 This comment is similar to Comment I22-34. See Response to Comment I22-34 for more discussion.

I22-48 This comment is similar to Comment I22-35. See Response to Comment I22-35 for more discussion.

I22-49 This comment is similar to Comment I22-36. See Response to Comment I22-36 for more discussion.

I22-50 The comment raises questions about the Draft EIR's analysis related to a "Robinson Ranch" project. The analysis contained in the Draft EIR does not compare impact analysis to this project. Overall, this comment is similar to Comment I22-37. See Response to Comment I22-37 for more discussion.

I22-51 This comment is similar to Comment I22-38. See Response to Comment I22-38 for more discussion.

I22-52 This comment is similar to Comment I22-38. See Response to Comment I22-38 for more discussion.

I22-53 This comment is similar to Comment I22-39. See Response to Comment I22-39 for more discussion.

I22-54 This comment is similar to Comment I22-40. See Response to Comment I22-40 for more discussion.

I22-55 This comment is similar to Comment I22-40. See Response to Comment I22-40 for more discussion.

I22-56 This comment is similar to Comment I22-41. See Response to Comment I22-41 for more discussion.

I22-57 The comment raises questions regarding planned improvements for Wiley Canyon Road. As discussed in the Draft EIR, Wiley Canyon Road is designated by the General Plan as a Secondary Highway, which is a four-lane road configuration, along the project frontage. However, the proposed project improvements would maintain a two-lane roadway configuration. For more discussion regarding traffic and circulation, see Topical Response No. 3 – Traffic and Circulation.

I22-58 The comment describes changes made to State Housing Law. This comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

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Response to Comment Letter I23

Shelley Hebdon
April 13, 2024

I23-1 The comment expresses opposition to the proposed project. The comment also recounts the former operations at the Smiser Mule Ranch. This comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I23-2 The comment expresses opposition to the project's proposed design. The project would comply with the City's design standards and zoning requirements. As further described in Section 4.1, Aesthetics, of the Draft EIR, the project would result in less than significant impacts. The comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

The comment also raises concern for traffic on Wiley Canyon Road. Although CEQA Guidelines Section 15064.3 states that traffic delay using level of service (LOS) metric is no longer considered a significant environmental impact under CEQA, a summary of project's traffic analysis using the LOS metric is provided in Appendix K-5 of the Draft EIR. An operational analysis of intersections was conducted, in which two intersections (I-5 Southbound at Calgrove Boulevard and I-5 Northbound at Calgrove Boulevard) would be significantly affected during the existing plus project condition, among others during the interim year cumulative scenario. As such, the project would construct or pay its fair-share towards improvements required to reduce operational deficiencies, including improvements to Wiley Canyon Road (Appendix K-5). These improvements would be included as conditions of approval for the project. Given this, the project would be required to comply with City requirements to reduce impacts associated with the project.

Additionally, the comment raises concern for wildlife within the project site's vicinity. As further described in Section 4.3, Biological Resources, of the Draft EIR, the project would result in less than significant impacts with mitigation incorporated. This comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

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Response to Comment Letter I24

Pamela Tognetti
April 13, 2024

I24-1 The comment expresses opposition to the proposed project and raises concern for potential impacts to biological resources, traffic, and noise.

Regarding biological resources, the project would result in less than significant impacts with mitigation incorporated, as further described in Section 4.3, Biological Resources, of the Draft EIR. This comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

Regarding traffic, although CEQA Guidelines Section 15064.3 states that traffic delay using level of service (LOS) metric is no longer considered a significant environmental impact under CEQA, a summary of project's traffic analysis using the LOS metric is provided in Appendix K-5 of the Draft EIR. The analysis identified potential impacts to intersections as a result of the project. As such, the project would construct or pay its fair-share towards improvements required to reduce operational deficiencies (Appendix K-5). These improvements would be included as conditions of approval for the project. Given this, the project would be required to comply with City requirements to reduce impacts associated with the project.

Regarding noise, significant unavoidable noise impacts would occur during construction due to an exceedance in noise thresholds for the nearest noise-sensitive uses in the project site's vicinity (e.g., the existing residences to the north, northeast, east, and southeast). Moreover, significant and unavoidable noise impacts would occur to the senior living facility during construction of other project components on site. Although mitigation measures MM-NOI-1 and MM-NOI-2 were incorporated to reduce impacts, construction noise impacts would remain significant until construction is deemed complete. All other noise-related impacts were determined to be less than significant, as further described in Section 4.12, Noise, of the Draft EIR.

Additionally, the comment regarding the aesthetics of the I-5 freeway is not related to the proposed project. No response is required.

I24-2 The comment raises concerns for noise, air quality, biological resources, traffic, and aesthetics. This comment is similar to Comment I24-2. See Response to Comment I24-2, above.

Regarding air quality, the project would result in less than significant impacts with mitigation incorporated, as further described in Section 4.2, Air Quality, of the Draft EIR. This comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

Regarding aesthetics, the comment raises concern for the project's impact to views of the mountain range along Old Road and Pico Canyon Road. As further described in Section 4.1, Aesthetics, of the Draft EIR, the General Plan Conservation and Open Space Element does not specifically list locally significant scenic vistas. Moreover, for the purposes of CEQA, scenic vistas are determined from public vantage points. The comment notes views of the mountain ranges to the west are visible from Canerwell

Street. The project's proposed structures would be visible at the intersection of Canerwell Street and Wiley Canyon Road. However, the quality of the views from the road near the project site is low due to intervening residential land uses, the I-5 freeway, aboveground utility infrastructure, and vegetation. As such, views of the hillsides and mountains are currently obscured by foreground elements and these views are typically narrow and short. Therefore, due to the existing environmental condition, implementation of the proposed project would result in less than significant impacts. Given this, no change or addition to the environmental analysis included in the Draft EIR is required.

I24-3 The comment notes wildlife sighting along the creek at the project site. This comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. However, for informational purposes, the project would result in less than significant impacts with mitigation incorporated. For more discussion, see Section 4.3, Biological Resources, of the Draft EIR.

I24-4 The comment requests improvements to commercial uses along Lyons Avenue. This comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no response is required.

I24-5 The comment expresses general opposition to the proposed project. The comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no response is required.

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Response to Comment Letter I25

Loraine Cuomo
April 14, 2024

I25-1 The comment is an introductory statement noting the attached letter, below. No response is required.

I25-2 The comment raises concern for the parking proposed on site. Regarding parking, see Topical Response No. 1 – Parking Plan for more discussion.

I25-3 The comment raises concerns for environmental impacts to Wiley Canyon Elementary School. The Draft EIR analyzes the project's impacts related to safety, transportation, noise, and air quality.

Although the comment is not specific in the safety concerns at Wiley Canyon Elementary School, the Draft EIR includes discussion regarding safety within Section 4.16, Transportation. As discussed in Section 4.16, Transportation, the project would include construction activities along Wiley Canyon Road, which would require an encroachment permit from the City's Public Works Department. If required, the project's contractor would prepare and implement a traffic control plan to ensure access for all road users and may include the need for flagmen and pedestrian detours. These improvements would not extend to the frontage along Wiley Canyon Elementary School. However, for school drop-off and pick-up activities, the City required traffic control plan would reduce safety impacts to the project site's vicinity. Regarding traffic concerns, Section 4.16 of the Draft EIR analyzes traffic effects. However, CEQA Guidelines Section 15064.3 states that traffic delay using LOS metric is no longer considered a significant environmental impact under CEQA. Nonetheless, a summary of project's traffic analysis using the LOS metric is provided in Appendix K-5, Traffic Analysis, of the Draft EIR for informational purposes. As discussed, an operational analysis was conducted for existing and cumulative year traffic conditions with and without project conditions. The analysis found intersections with potential deficiencies. Therefore, the project would construct or pay its fair-share towards improvements required to reduce operational deficiencies. These improvements would be included as conditions of approval for the project. Implementation of these improvements, as further detailed in Appendix K-5, would reduce impacts.

Regarding circulation of truck traffic along Wiley Canyon Road via Calgrove Boulevard, it should be noted that the Santa Clarita Municipal Code restricts commercial vehicles exceeding 14,000 pounds or 6.35 tones along certain highways including the segment of Wiley Canyon Road between Orchard Village Road and Calgrove Boulevard. During the construction phase, the project's contractor is required to secure appropriate haul route permits from the City for operation of heavy trucks along Wiley Canyon Road before grading permits are issued. This would include obtaining oversize or overweight vehicle permit and preparing a Traffic Control Plan ensures that the trucks do not disrupt traffic or damage road conditions and maintain access for all road users along the truck route and locations such as project access, nearby schools, residences and businesses in the area.

Regarding construction noise, the Draft EIR determined significant construction-related noise impacts to adjacent sensitive receivers would occur due to an exceedance in noise standards. Impacts to adjacent sensitive uses were determined to be significant and unavoidable even with the incorporation of mitigation measures MM-NOI-1 and MM-NOI-2. Section 4.12, Noise, of the Draft EIR further states noise-sensitive receptors were identified approximately 330 feet to the north and 130 fee to the east.

Noise generated during construction would further dissipate with distance from the noise source. Moreover, construction activities would be temporary and cease to occur after the completion of the proposed project.

Regarding air quality, the Draft EIR analyzes air quality impacts within Section 4.2, Air Quality. Project construction activities were estimated by assuming a conservative scenario. As a result of air quality modeling (included in Appendix B of the Draft EIR), the project would not exceed South Coast Air Quality Management District (SCAQMD) thresholds of significance. Thus, impacts would be less than significant. Additionally, the project would be required to comply with existing rules and regulations, including SCAQMD Rule 403, Fugitive Dust, which requires projects to prevent, reduce or mitigate fugitive dust emissions from a site.

I25-4 The comment raises concern for the project's proposed height and impacts to views from private property. As further described in Section 4.1, Aesthetics, of the Draft EIR, the General Plan Conservation and Open Space Element does not specifically list locally significant scenic vistas. For the purposes of CEQA, scenic vistas are determined from public vantage points. Moreover, the quality of the existing views from the road near the project site is low due to intervening residential land uses, the I-5 freeway, aboveground utility infrastructure, and vegetation. Views of the hillsides and mountains are currently obscured by foreground elements and these views are typically narrow and short. Therefore, due to the existing environmental condition, implementation of the proposed project would result in less than significant impacts. Given this, no change or addition to the environmental analysis included in the Draft EIR is required.

Regarding the height of the proposed structures after grading activities, the tallest structure on the site would be the senior housing building, which would have a maximum height of 50 feet. The current elevation of the site is 1,303 feet above sea level; after site grading, the average elevation of the project site would be 1,305 feet above sea level.

I25-5 The comment raises concern for traffic circulation during construction activities. As discussed in Section 4.16, Transportation, the project would require an encroachment permit from the City's Public Works Department. As such, the project's contractor would prepare and implement a traffic control plan to ensure access for all road users and may include the need for flagmen and pedestrian detours. With the implementation of existing City policy, the traffic control plan would reduce circulation impacts to the project site's vicinity. The comment further requests the gate at Calgrove Boulevard be open during construction. The applicant does not control the gate at Calgrove Boulevard.. Given this, no change or addition to the environmental analysis included in the Draft EIR is required.

I25-6 The comment raises concern for planned improvements to Wiley Canyon Road. As discussed in the Draft EIR, Wiley Canyon Road is designated by the General Plan as a Secondary Highway, which is a four-lane road configuration, along the project frontage. However, the proposed project improvements would maintain a two-lane roadway configuration. For more discussion regarding traffic and circulation, see Topical Response No. 3 – Traffic and Circulation.

I25-7 The comment raises concerns regarding emergency evacuation. The Draft EIR analyzes the project's impact to evacuation planning within Section 4.8, Hazards and Hazardous Materials, and Section 4.19, Wildfire, of the Draft EIR. Moreover, the Draft EIR includes a Wildfire Evacuation Plan, included as Appendix N to the EIR for public review. The comment does not contain any specific concerns related

to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

Additionally, the comment notes the gate on Calgrove Boulevard. This comment is similar to Comment I25-5. See Response to Comment I25-5 for more discussion.

I25-8 The comment raises general concerns regarding wildfire evacuation and traffic within the city. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

Regarding the project's impact to wildfire evacuation planning, see Section 4.19, Wildfire, of the Draft EIR.

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Response to Comment Letter I26

Annette Lucas
April 14, 2024

I26-1 The comment asserts the Draft EIR does not include traffic analysis for Wiley Canyon Road, including traffic crashes on the I-5 freeway. Additionally, the comment requests Wiley Canyon Road to be widened like Old Road. Although the project would result in vehicle trips that are distributed to the I-5 freeway, the project's impacts related to traffic accidents is not a required topic of analysis under CEQA. Furthermore, the project's effect on the I-5 freeway, including vehicle crashes, are speculative in nature. Instead, Section 4.16, Transportation, of the Draft EIR includes analysis of the project's potential to substantially increase hazards due to a geometric design feature. As detailed in Section 4.16, the project's traffic impacts (i.e., queuing and circulation) would require improvements to various intersections and facilities, as recommended in the Traffic Analysis (Appendix K of the Draft EIR). These improvements include Caltrans facilities: I-5 Northbound Ramp/ Lyons Avenue (Signalized); I-5 Southbound Ramp/ Calgrove Boulevard (Unsignalized), I-5 Northbound Ramp/ Calgrove Boulevard (Unsignalized) (Draft EIR, p. 4.16-19). As a result, the project would pay or construct these improvements, including either a roundabout or traffic signal and traffic signal adjustment/retiming, at the discretion of Caltrans. No hazardous geometric design features would be part of the project's roadway improvements. Moreover, although CEQA Guidelines Section 15064.3 states that traffic delay using level of service (LOS) metric is no longer considered a significant environmental impact under CEQA. However, a summary of project's traffic analysis using the LOS metric is provided in Appendix K-5 of the Draft EIR for informational purposes. As shown, an operational analysis of intersections, including Wiley Canyon Road, was conducted, in which two intersections would be significantly affected. The project would construct or pay its fair-share towards improvements required to reduce operational deficiencies, including improvements to Wiley Canyon Road (Appendix K-5). These improvements would be included as conditions of approval for the project.

The comment further requests for Wiley Canyon Road to be widened. This comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. The commenter's request will be provided to the City's decision makers for consideration of the Final EIR.

I26-2 The comment raises concerns for traffic around Wiley Canyon Elementary School. The existing conditions and project-related impacts are analyzed in Section 4.16, Transportation, of the Draft EIR and further detailed in Appendix K-5. Similar to Response to Comment I26-1, the Draft EIR includes an LOS analysis and recommends improvements as conditions of approval. See Response to Comment I26-1 for more discussion. No new or additional traffic studies are required as a result of this comment.

I26-3 The comment raises concern for capacity at a nearby hospital. Impacts to hospitals are not an identified environmental resource topic within the State or local CEQA guidelines. Moreover, this hospital is not publicly owned and, therefore, not considered a public service. The project would not result in substantial unplanned population growth as the project's housing, population, and employment growth would be within growth projections for the Santa Clarita Valley. Given this, less than significant impacts would occur, as further detailed in Section 4.13, Population and Housing, of the Draft EIR. As such, this comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. No further response is required.

I26-4 The comment asserts the Draft EIR does not contain discussion on dust, particulate matter, hazards, liquefaction, and flooding. Section 4.2, Air Quality, analyzes dust-related impacts (including PM_{10} and $PM_{2.5}$) and health hazards related to air quality; Section 4.8, Hazards and Hazardous Materials, includes discussion of health hazards; Section 4.6, Geology and Soils, analyzes impacts associated with liquefaction; and Section 4.9, Hydrology and Water Quality, analyzes impacts associated with flood zones. However, the comment does not provide substantial evidence to require additional study. As such, this comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. No further response is required.

I26-5 The comment raises concern for proposed improvements to Wiley Canyon Road. As discussed in the Draft EIR, Wiley Canyon Road is designated by the General Plan as a Secondary Highway, which is a four-lane road configuration, along the project frontage. However, the proposed project improvements would maintain a two-lane roadway configuration. For more discussion regarding traffic and circulation, see Topical Response No. 3 – Traffic and Circulation.

I26-6 The comment raises concern for proposed improvements to Wiley Canyon Road. This comment is similar to Comment I26-5. See Response to Comment I26-5 for more discussion.

I26-7 The comment states the project must comply with applicable standards for landscaping. the Draft EIR includes discussion on consistency with landscaping standards. In addition, implementation of MM-FIRE-3, LACFD FMZ Plant Selection Guideline Compliant, would ensure proposed landscaping would comply with applicable landscaping requirements and not contribute to extreme fire behavior. See more discussion in Section 4.19, Wildfire, of the Draft EIR. Given this, the Draft EIR adequately addresses this comment. No changes to the analyses in the Draft EIR are required as a result of this comment.

I26-8 The comment raises concern for proposed improvements to Wiley Canyon Road. This comment is similar to Comment I26-5. See Response to Comment I26-5 for more discussion.

I26-9 The comment raises concern for proposed improvements to Wiley Canyon Road. This comment is similar to Comment I26-5. See Response to Comment I26-5 for more discussion. Additionally, the comment notes a proposed wall between the roundabouts and cul-de-sac.

I26-10 The comment raises concern for proposed improvements to Wiley Canyon Road. This comment is similar to Comment I26-5. See Response to Comment I26-5 for more discussion.

I26-11 The comment raises concern for proposed improvements to Wiley Canyon Road. This comment is similar to Comment I26-5. See Response to Comment I26-5 for more discussion.

I26-12 The comment requests landscaping along Wiley Canyon Road between Wabuska Street to Calgrove Boulevard. This comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. However, the suggestion will be provided to the City's decision makers for review as part of this Final EIR.

I26-13 The comment requests the availability of verbal and written comments from the March 19, 2024 Planning Commission meeting. Verbal comments provided during the March 19, 2024 Planning Commission meeting are summarized within Section 1.3.2, within this Final EIR.

I26-14 The comment expressed opposition to the project's proposed density as it relates to the Calgrove Corridor/Smiser Ranch Special Development Area of the General Plan. The Draft EIR analyzes the project's consistency with the site's zoning within Section 4.10, Land Use and Planning. As further detailed in Section 4.10, the project is consistent with the City's General Plan and zoning for the project site with the approval of a Conditional Use Permit and Minor Use Permit. Moreover, the project would be subject to Development and Architectural Design Review by the City's Planning Commission, in compliance with the Santa Clarita Municipal Code Section 17.55.040, Architectural and Design Standards. The proposed project would not require a General Plan amendment to the site's existing land use designation of Mixed Use – Neighborhood, as the project would be consistent with the intended use, density, FAR, and height limitations established for the site. Furthermore, the project is consistent with the development characteristics for the Calgrove Corridor/ Smiser Ranch Special Development Area of the General Plan . No change or addition to the environmental analysis included in the Draft EIR is required.

I26-15 The comment raises concern for proposed improvements to Wiley Canyon Road. This comment is similar to Comment I26-5. See Response to Comment I26-5 for more discussion. Additionally, the suggestion for construction phasing will be provided to the City's decision makers for review as part of this Final EIR. No change or addition to the environmental analysis included in the Draft EIR is required.

I26-16 The comment expresses support for the City to purchase the project site for open space. This comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. .

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Response to Comment Letter I27

Annette Lucas
April 14, 2024

I27-1 The comment expresses concern for wildfire risk and evacuation planning along Wiley Canyon Road and request that the City have CalFire review the proposed project, particularly the removal of Wiley Canyon Road from the plan. Section 3.4.7.1 in the Draft EIR and Section 1.2.2.1 of the Wildfire Evacuation Study (WES) (Appendix N) explain that the project is located within a Very High Fire Hazard Severity Zone. As discussed in Section 4.16.1 in the EIR, Wiley Canyon Road is oriented generally in a north-south direction in the vicinity of the project, beginning just south of the project at its intersection with Calgrove Boulevard. According to the City's General Plan, Wiley Canyon Road is considered to be a Secondary Highway in the project area (from Calgrove Boulevard to Lyons Avenue). At Lyons Avenue, Wiley Canyon Road is a four-lane roadway, and as it nears the project site it narrows to two lanes.

As explained in Section 4.16.5 of the EIR, the project will have a less than significant impact with regard to potential conflicts with OVOV goals and policies. The Circulation Element of OVOV includes goals, objectives and policies pertaining to circulation within the Santa Clarita planning area, which includes the project site. Accordingly, the project would not conflict with or impede implementation of any applicable policies within the OVOV and would result in a less than significant impact.

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Response to Comment Letter I28

Robert McSweeney
April 14, 2024

I28-1 The comment expresses opposition to the proposed project. The comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR. No further response is required.

I28-2 The comment raises concern for the project objectives for the proposed project. The project objectives can be found under Section 3.3 of the Draft EIR (Draft EIR pages 3-3 and 3-4), and analysis of each alternatives' ability to meet the project objectives is detailed throughout Chapter 6, Alternatives, and summarized in Table 6-10, Comparison of Project and Alternatives Meeting Project Objectives, on pages 6-38 through 6-40.

I28-3 The comment asserts the project does not meet the Land Use Element goals, objectives, and policies. As demonstrated throughout Table 4.10-2, General Plan Land Use Consistency Analysis, the project would be consistent with the General Plan Land Use Element. Similarly, the comment asserts the project is not compatible with the surrounding land uses. The project was determined to be consistent with the applicable standards for height and density under the site's zoning (see Section 4.10, Land Use and Planning). The Draft EIR also includes a consistency analysis with the City's Community Character and Design Guidelines, as shown in Table 4.1-1 of Section 4.1, Aesthetics. Moreover, the project is subject to Section 17.55.040, Architectural and Design Standards, of the Santa Clarita Municipal Code, which would require a design review hearing for the proposed project.

Additionally, the comment expresses general opposition to traffic, parking, and infrastructure costs. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I28-4 The comment raises concern for the proposed project's consistency with the City Engineer's Report on Open Space Preservation District dated May 14, 2021. This report is an annual report for the Open Space Preservation District Assessment, specifically intended to evaluate the assessments collected to fund the ongoing maintenance and service to the City's open space, park and parkland program. The project site is not designated as open space and is not applicable. Therefore, the comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

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Response to Comment Letter I29

Pamela Tognetti
April 14, 2024

I29-1 This comment is the same comment letter received and included as Comment Letter I24. See Response to Comment Letter I24 for more discussion. No further response is required.

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Response to Comment Letter I30

Julie and Jeff Ford
April 15, 2024

I30-1 The comment notes the following comments (included as Comment I30-3) were also sent via mail. No further response is required.

I30-2 The comment raises concerns for the project's potential to increase risk of Valley fever. Coccidioidomycosis, more commonly known as "Valley Fever," is an infection caused by inhalation of the spores of the *Coccidioides immitis fungus*, which grows in the soils of the southwestern United States. The ecologic factors that appear to be most conducive to survival and replication of the spores are high summer temperatures, mild winters, sparse rainfall, and alkaline, sandy soils. Los Angeles County is not considered a highly endemic region for Valley fever, as the latest report from the Los Angeles County Department of Public Health listed an incident rate of 10.38 cases per 100,000 people in 2017. Similarly, the incident rate of Valley Fever in the San Fernando planning area (which includes the City) in 2017 was 13.2 cases per 100,000 people.[5]

The comment specifically raises concern for exposure as a result of extensive grading during construction. The Draft EIR analyzes the potential for air quality impacts during construction. Table 4.2-6 demonstrates the project would not exceed significance thresholds established by the South Coast Air Quality Management District for $PM_{2.5}$ and PM_{10}. Moreover, health risk associated with toxic air contaminants were determined to be less than significant with the incorporation of MM-AQ-1, which requires the use of construction equipment that meets the California Air Resources Board and U.S. Environmental Protection Agency Tier 4 Final off-road emission standards.

Additionally, the project would be required to comply with existing rules and regulations, including SCAQMD Rule 403, Fugitive Dust, which requires projects to prevent, reduce or mitigate fugitive dust emissions from a site, such as covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities. Fugitive dust control measures are not considered mitigation under CEQA because they are regulatory compliance.

Although Valley fever was not explicitly stated in the Draft EIR, the contributing factors to Valley fever were captured in the EIR's analysis. CEQA Guidelines Section 15088.5 states a lead agency is required to recirculate an EIR when a significant new information results in a new significant environmental impact. New information added to an EIR is not considered significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. Therefore, as discussed above, this discussion does not change the impact conclusions in the Draft EIR, nor do they result in any new significant impacts or the need for new or altered mitigation measures. Rather, the information merely augments the discussion already presented in the Draft EIR, and results in no change to the conclusions or mitigation measures previously presented. As such, a new significant impact would not occur nor would an increase in the severity of a previously identified

[5] County Department of Public Health. 2017. Acute Communicable Disease Control Program: Annual Morbidity Report and Special Studies Report. Accessed June 12, 2024. http://publichealth.lacounty.gov/acd/pubs/reports/2017Annual.pdf.

significant impact would as a result. Therefore, this comment does not warrant recirculation of the Draft EIR.

I30-3 This comment is the same comment letter received and included as Comment Letter I16. See Response to Comment Letter I16 for more discussion. No further response is required.

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Response to Comment Letter I31

Maggie Cockerell
April 15, 2024

I31-1 The comment expresses opposition to the proposed project. In addition, the comment suggests an alternative to convert the project site to a private club or public park. In addition, the comment states a lack of safe bicycle paths and park facilities in the project site's vicinity. The project as proposed would result in multifamily residential, senior living, commercial, and open space land uses on site. Additionally, the project would include off-site improvements to Wiley Canyon Road, including bicycle lanes. On site, the project would bicycle lanes along a trail, which is designed to augment connectivity to the existing bicycle network between the project site with other parts of the City. Moreover, the project would include passive recreational uses on the southern portion of the site. This would be connected with the aforementioned bicycle lanes as well as pedestrian trails.

Regarding the suggested alternative, the Draft EIR includes Alternative 3, Private Recreational Facility Alternative. As further detailed under Section 6.4.3 of the Draft EIR, this alternative would include a 10,000 square foot clubhouse/restaurant, eight tennis courts, seven pickleball courts, a soccer field, a football field, baseball field and outdoor basketball court. For more details, see Figure 6-2, Alternative 3 Site Plan.

Overall, this comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

I31-2 The comment asserts the project would obscure views of Towsley Canyon. As further described in Section 4.1, Aesthetics, of the Draft EIR, the General Plan Conservation and Open Space Element does not specifically list locally significant scenic vistas. Moreover, for the purposes of CEQA, scenic vistas are determined from public vantage points. The comment notes views of the mountain ranges to the west are visible from the neighborhoods bordering the project site. The project's proposed structures would be visible from public vantage points, such as those from Wiley Canyon Road. However, the quality of the views is low due to intervening residential land uses, the I-5 freeway, aboveground utility infrastructure, and vegetation. As such, views of the hillsides and mountains are currently obscured by foreground elements and these views are typically narrow and short. Implementation of the proposed project would not significantly exacerbate the existing views of Towsley Canyon. Thus, as described in Section 4.1, impacts would be less than significant.

Regarding visual simulations, the Draft EIR does not include conceptual illustrations of the proposed project on site. However, Figure 3-5, Conceptual Elevations, illustrates the project's proposed building materials and colors as well as height. In addition, Figure 3-4b, Tentative Tract Map, details which the proposed number of stories at each building on site.

I31-3 This comment raises concerns that the project would block wildlife passage to Towsley Canyon from open space neighboring Oakridge by putting in fencing. As stated in section 3.4.8.3 of the Draft EIR, a 5-foot vinyl or wood lodge pole fence would be installed along the proposed asphalt trail that borders the South Fork of the Santa Clara River allowing wildlife to use the river or trail instead of Wiley Canyon Road.

I31-4 This comment raises concerns that the project would cover the riverbed. As stated in section 4.3.1.2 of the Draft EIR, a majority of the portion of the South Fork of the Santa Clara River would be maintained and the project proposes to widen the existing channel to create additional riparian habitat.

I31-5 The comment raises concern for light pollution as a result of the proposed project. Section 4.1, Aesthetics, of the Draft EIR includes analysis of the project's potential to create substantial light or glare in the area. Due to the existing conditions, implementation of the project would introduce significant new sources of light, including interior lighting, exterior mounted lighting, and outdoor lighting throughout the site. Design considerations, such as walls and fences are proposed on site to reduce light trespass to adjacent light-sensitive receptors. In addition, the project would be required to comply with Section 17.51.050, Outdoor Lighting Standards, of the Santa Clarita Municipal Code, which would regulate and minimize light by design and require the applicant to submit a lighting plan for review and approval by the Director of the City's Planning Division. Given this, impacts were determined to be less than significant. No change or addition to the environmental analysis is required as a result of this comment.

I31-6 The comment raises concern for future views from the project onto adjacent residential homes. Similar to the discussion provided in Response to Comment I32-2, CEQA requires analysis of a project's potential impact to views from publicly accessible vantage points. Moreover, privacy is not a specified environmental topic area outlined in the State CEQA Guidelines. Thus, concerns pertaining to the project's impact to private property's privacy is outside of the scope of the required environmental analysis. Given this, no change or addition to the environmental analysis included in the Draft EIR is required.

I31-7 The comment raises concern for air quality and noise impacts during construction. Additionally, the comment requests the City or the applicant provide nearby residents with filters.

The Draft EIR analyzes the potential for air quality impacts during construction. Table 4.2-6 demonstrates the project would not exceed significance thresholds established by the South Coast Air Quality Management District for $PM_{2.5}$ and PM_{10}. Moreover, health risk associated with toxic air contaminants were determined to be less than significant with the incorporation of MM-AQ-1, which requires the use of construction equipment that meets the California Air Resources Board and U.S. Environmental Protection Agency Tier 4 Final off-road emission standards. Additionally, the project would be required to comply with existing rules and regulations, including SCAQMD Rule 403, Fugitive Dust, which requires projects to prevent, reduce or mitigate fugitive dust emissions from a site, such as covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities.

Regarding filter systems, a Health Risk Assessment, included as Appendix B to the Draft EIR, was prepared due to the proximity of the proposed townhomes along the project site's western boundary. As a result, in accordance with California Title 24 standards, window filters would be installed to reduce the potential risk to future occupants of the proposed project. Therefore, impacts were determined to be less than significant. The comment raises concerns about Valley Fever, see response to Comment O30-2 and additionally, Valley Fever predominantly occurs in Kern and King County, incidences in Valley Fever in Los Angeles County have occurred (CDPH 2024). While there is currently no evidence of Valley Fever spores on-site, as detailed in Section 4.2, Air Quality, project activities would be subject to South Coast Air Quality Management District (SCAQMD) rules, including Rule 402, Nuisance, and Rule 403,

Fugitive Dust, which prohibit the discharge from any source of air contaminants or other materials which could cause injury, determent, nuisance, or annoyance that may endanger the comfort, health, or safety of the public as well as requiring best available control measures to prohibit visible particulate matter from crossing any property line. To demonstrate compliance with SCAQMD Rule 403, projects must submit a fugitive dust control plan describing the methods of compliance during construction. Compliance with these rules will protect offsite sensitive receptors from the potential exposure to Valley Fever spores.

CDPH (California Department of Public Health). 2024. Valley Fever in California Dashboard. Page last updated January 16, 2024. Accessed August 22, 2024. https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/ValleyFeverDashboard.aspx.

I31-8 The comment raises concern for the proposed emergency access. Section 4.16, Wildfire, of the Draft EIR addresses impacts related to emergency access and concluded less than significant impacts would occur in accordance with building code and fire code requirements, including the City design standards (Draft EIR, pp. 4.16-19 and 4.16-20). Moreover, the proposed site plan will be reviewed and approved by the fire department during the plan check and permitting process. Additionally, during a wildfire event, mitigation is incorporated to reduce impacts during construction to a less-than-significant level. No change or addition to the environmental analysis included in the Draft EIR is required. The comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

I31-9 The comment raises concern for traffic along Wiley Canyon Road as a result of the proposed project. Although CEQA Guidelines Section 15064.3 states that traffic delay using level of service (LOS) metric is no longer considered a significant environmental impact under CEQA, a summary of project's traffic analysis using the LOS metric is provided in Appendix K-5 of the Draft EIR. As shown, an operational analysis of intersections was conducted, in which two intersections (I-5 Southbound at Calgrove Boulevard and I-5 Northbound at Calgrove Boulevard) would be significantly affected during the existing plus project condition, among others during the interim year cumulative scenario. As such, the project would construct or pay its fair-share towards improvements required to reduce operational deficiencies, including improvements to Wiley Canyon Road (Appendix K-5). These improvements would be included as conditions of approval for the project. Given this, the project would be required to comply with City requirements to reduce impacts associated with the project. No change or addition to the environmental analysis included in the Draft EIR is required.

I31-10 The comment expresses general opposition to the proposed project. No further response is required.

I31-11 The comment appears to represent photos along Wiley Canyon Road. In addition, the comment raises concern for the project's proposed building heights. This comment is similar to Comment I31-2. See Response to Comment I31-2 for more discussion. No further response is required.

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Response to Comment Letter I32

Stephanie Correnti
April 15, 2024

I32-1 The comment raises concerns for outreach to the residents of the Mulberry Mobile Home Park. The noticing requirements under CEQA are the responsibility of the City to conduct and comply with. As such, in accordance with CEQA Guidelines Section 15087, the City provided a public notice of availability (NOA) of the Draft EIR through more than the required procedures. The City published the NOA in a newspaper of general circulation (i.e., The Santa Clarita Valley Signal), posted the notice on site, and mailed to owners and occupants of properties within 1,000 feet of the parcels on which the project is located. Additionally, a public notice was posted ahead of the Planning Commission meeting on March 19, 2024. Given this, the City's noticing and posting procedures for the proposed project met all state and local requirements.

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Response to Comment Letter I33

Linda Heberer
April 15, 2024

I33-1 The comment raises general concerns for the proposed project. However, this comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I33-2 The comment raises general concerns regarding the plants and wildlife that may currently use the project site, and for the South Fork of the Santa Clara River. As stated in section 4.3.1.1, the project is located in area that is primarily developed. The species that are expected to occur on the project site are common and adapted to the urban environment. Individuals of species on the project site are expected to leave the site as construction commences and into the natural open space to the east of the project. MM-BIO-5 provides avoidance and minimization measure to protect active bird nests since the eggs and nestlings cannot move. As stated in section 4.3.1.2 of the Draft EIR, the majority of the South Fork of the Santa Clara River onsite would be maintained, and the project proposes to widen the existing channel to create additional riparian habitat.

I33-3 The comment raises concern for traffic. Although CEQA Guidelines Section 15064.3 states that traffic delay using level of service (LOS) metric is no longer considered a significant environmental impact under CEQA, a summary of project's traffic analysis using the LOS metric is provided in Appendix K-5 of the Draft EIR. As shown, an operational analysis of intersections was conducted, in which two intersections (I-5 Southbound at Calgrove Boulevard and I-5 Northbound at Calgrove Boulevard) would be significantly affected during the existing plus project condition, among others during the interim year cumulative scenario. The project would construct or pay its fair-share towards improvements required to reduce operational deficiencies, including improvements to Wiley Canyon Road (Appendix K-5). These improvements would be included as conditions of approval for the project. Given this, the project would be required to comply with City requirements to reduce impacts associated with the project. No change or addition to the environmental analysis included in the Draft EIR is required.

Regarding traffic circles, emergency services, and cut-through traffic, an adequate analysis is included in Appendix K-5 and Section 4.16, Transportation. A series of roundabouts similar to proposed project, can have traffic calming effects on streets by reducing vehicle speeds based on research published in the NCHRP Report [6]. Therefore, commuters traveling along the parallel route, i.e. the I-5, would not find Wiley Canyon Road a faster option compared to their main route of travel and therefore, cut-through traffic would be reduced once roundabouts are installed along Wiley Canyon Road. As noted further, in research published in the NCHRP Report [7] , roundabouts also provide emergency vehicles the benefit of lower speeds, which make them safer for them to negotiate than signalized intersections. Unlike at

[6] See page 2-10, Chapter 2/Roundabout Consideration, 2.2.8 Traffic Calming. National Academies of Sciences, Engineering, and Medicine. 2010. Roundabouts: An Informational Guide – Second Edition. Washington, DC: The National Academies Press. https://doi.org/10.17226/22914.

[7] See page 2-20, Chapter 2/Roundabout Consideration, 2.3.7 Emergency Vehicles. National Academies of Sciences, Engineering, and Medicine. 2010. Roundabouts: An Informational Guide – Second Edition. Washington, DC: The National Academies Press. https://doi.org/10.17226/22914.

signalized intersections, emergency vehicle drivers are not faced with through vehicles unexpectedly running the intersection and hitting them at high speed.

Regarding wildfire evacuation, a Wildfire Evacuation Study (included as Appendix N), was prepared to support the conclusions found within the EIR. The comment does not raise specific concerns related to the adequacy of the Draft EIR; therefore, no further response is required.

I33-4 The comment raises concerns about parking. As detailed further in Appendix K-4, the project proposes to provide 966 parking spaces, including 582 spaces reserved for multifamily residents and 109 spaces reserved for senior living residents. The remaining would be shared. According to Appendix K-4, the project's proposed parking supply would be sufficient and would accommodate all uses. Regarding parking, see Topical Response No. 1 – Parking Plan for more discussion.

Regarding the potential for overflow parking off site, the project applicant does not control the properties surrounding the project site. Moreover, current CEQA law provides that parking deficits are not significant environmental impacts in an urban context. Thus, parking availability in an urban environment (such as the project site) is not an environmental impact under CEQA. Given this, this comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. Nevertheless, this comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR. See Topical Response No. 1 – Parking Plan for more discussion.

I33-5 The comment raises concerns for dust-related emissions during construction. The Draft EIR analyzes air quality impacts within Section 4.2, Air Quality, of the Draft EIR. Dust is typically captured within discussions on particulate matter. Particulate matter air pollution is a mixture of solid particles and liquid droplets found in the air (Draft EIR, p. 4.2-8). For the purposes of the environmental analysis, project construction activities were estimated by assuming a conservative scenario and applying the mobile source and fugitive dust emissions factors. As a result of air quality modeling (included in Appendix B of the Draft EIR), the project would not exceed South Coast Air Quality Management District (SCAQMD) thresholds of significance. Thus, impacts would be less than significant.

Additionally, the project would be required to comply with existing rules and regulations, including SCAQMD Rule 403, Fugitive Dust, which requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Additionally, projects must utilize the best available control measures. For more discussion regarding dust-related impacts, see Section 4.2 of the Draft EIR. No change or addition to the environmental analysis included in the Draft EIR is required.

I33-6 The comment raises concern for the height of the proposed buildings. Upon completion of site grading, the project site would sit at 1,305 feet in elevation. The tallest building on the project site, the senior facility, would be 50 feet in height, consistent with the City's MX-N zone. Moreover, a consistency analysis for the project with the Community Character and Design Guidelines was conducted, as shown in Section 4.1, Aesthetics, of the Draft EIR. Table 4.1-1 demonstrates the project's consistency the City's Design Guidelines. In addition, the project is subject to Section 17.55.040, Architectural and Design Standards, of the Santa Clarita Municipal Code. The project would undergo a plan check review for its compatibility with applicable land use and zoning regulations for the site.

I33-7 The comment raises concern regarding right-of-way in relation to existing property lines. The existing right-of-way on the east side of Wiley Canyon Road, adjacent to existing residential properties, would remain unchanged as part of the proposed project. All necessary right-of-way dedication and acquisition would occur along the west side of Wiley Canyon Road. Right-of-way dedication would be secured through the project's conditions of approval prior to issuance of building permits.

I33-8 The comment requests additional review and alternatives to the proposed project. The Draft EIR considered a reasonable range of alternatives, as further detailed in Chapter 6, Alternatives. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

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Response to Comment Letter I34

Sheryl Lucas
April 15, 2024

I34-1 The comment raises concern for wildfire risk. The Draft EIR includes analysis of the project's potential to exacerbate wildfire risk within Section 4.19, Wildfire, in which less than significant impacts would occur with the incorporation of mitigation measures. In addition, a Wildfire Evacuation Plan (included as Appendix N), was prepared to support the conclusions found within the EIR. The comment does not raise specific concerns related to the adequacy of the Draft EIR; therefore, no further response is required.

Regarding an attached article, the comment does not include an article. No response is required.

I34-2 The comment expresses general opposition to the proposed project. Additionally, the comment raises concern for emergency access on the project site.

Regarding the Circulation Element and as discussed in the Draft EIR, Wiley Canyon Road is designated by the General Plan as a Secondary Highway, which is a four-lane road configuration, along the project frontage. However, the proposed project improvements would maintain a two-lane roadway configuration. For more discussion regarding traffic and circulation, see Topical Response No. 3 – Traffic and Circulation.

As explained in Section 4.16.5 of the Draft EIR, the project will have a less than significant impact with regard to potential conflicts with OVOV goals and policies. The Circulation Element of OVOV includes goals, objectives and policies pertaining to circulation within the Santa Clarita planning area, which includes the project site. Accordingly, the project would not conflict with or impede implementation of any applicable policies within the OVOV and would result in a less than significant impact.

As discussed in Section 4.19.4 of the Draft EIR, the project would also include emergency access via Hawkbryn Avenue at the northwestern corner of the project site. This emergency access would be available to emergency vehicles 24 hours a day, 7 days a week, and limits access of private vehicles to the discretion of law enforcement and fire during an emergency such as a wildfire evacuation.

Section 4.14.4, Public Services, of the Draft EIR describes the project impact on response times, and states that in correspondence with the LACFD, the department indicated that Fire Station 124, the nearest to the project site, would have an average response time of 8 minutes, which is consistent with the LACFD response standard of eight minutes for the first arriving unit in suburban areas, such as the project site.

I34-3 The comment raises concern for wildfire risk from winds. The Draft EIR includes analysis under Threshold FIRE-2, in which impacts would be less than significant with the incorporation of MM-FIRE-1 and MM-FIRE-2 (Draft EIR, p. 4.19-16). These mitigation measures would reduce the possibility of fire during construction activities. For example, MM-FIRE-1 would subject the project to additional requirements, including limiting or ceasing construction work during high-wind weather events. Given this, no change or addition to the environmental analysis is required as a result of this comment.

Regarding emergency access, this comment is similar to Comment I34-2. See Response to Comment I34-2 for more discussion. Similarly, regarding the Circulation Element, see Response to Comment I34-2.

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Response to Comment Letter I35

Annette Lucas
April 15, 2024

I35-1 The comment lists land use and traffic information that a traffic model uses to provide baseline and future traffic forecasts and requests ongoing updates to traffic modeling. The project uses appropriate VMT and traffic forecasts from the City approved travel demand models (i.e., the Southern California Association of Govemernts Travel Demand Model and the Santa Clarita Valley Consolidated Traffic Model) for analyses provided in Appendix K1 Vehicle Miles Travel Analysis and K5 Traffic Analysis. No change to the environmental analysis is required as a result of this comment.

I35-2 The comment raises concern for the transportation analysis' assumptions on transit trips. All conclusions in the Draft EIR are supported by substantial evidence (including facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts), as defined in Section 15384 of the CEQA Guidelines. No change to the environmental analysis is required as a result of this comment.

I35-3 The comment suggests the California Department of Transportation (Caltrans) should be consulted on the planned improvements to Wiley Canyon Road. The City has notified Caltrans of the proposed project throughout each stage of the environmental review process (e.g., Notice of Preparation and Notice of Availability). Notably, Caltrans provided a comment on the Draft EIR, included as Comment Letter A4. Moreover, as shown in Comment Letter A4, Caltrans concurred with the findings of the traffic analysis (included as Appendix K). For more discussion, see Response to Comment Letter A4.

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Response to Comment Letter I36

Michele Moline
April 15, 2024

I36-1 The comment is the same as Comment Letter I35. See Response to Comment Letter I35. No further response is required.

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Response to Comment Letter I37

Kevin McDonald
April 15, 2024

I37-1 The comment expresses general opposition to the proposed project. The comment does not include specific comments related to the adequacy of the Draft EIR; therefore, no further response is required.

I37-2 The comment incorrectly states the weight restriction for commercial vehicles along Wiley Canyon Road. See response to comment 135-2 for discussion on construction traffic along Wiley canyon and measures that would be implemented by the project's contractor.

I37-3 The comment raises concern for the project's design. The project is subject to Section 17.55.040, Architectural and Design Standards, of the Santa Clarita Municipal Code, which requires the proposed design to comply with the City's design requirements. A consistency analysis with the Community Character and Design Guidelines was conducted. Table 4.1-1 demonstrates the project is consistent with the City's Design Guidelines. Moreover, the project would undergo a plan check review to ensure compatibility with applicable land use and zoning regulations for the site.

I37-4 The comment raises concern for parking on site. Under the proposed project, the applicant would provide less parking than required by the Santa Clarita Municipal Code, as detailed in project design feature PDF-TRA-2, Limit Parking Supply. This is due to a shared parking provision, supported by a parking demand study (Appendix K-4), which would reduce the required parking on site by 13% and reduce vehicle miles traveled by 1.23% (Draft EIR, p. 4.16-17). As detailed further in Appendix K-4, the project proposes to provide 966 parking spaces, including 582 spaces reserved for multifamily residents and 109 spaces reserved for senior living residents. The remaining would be shared. According to Appendix K-4, the project's proposed parking supply would be sufficient and would accommodate all uses. See Appendix K-4 and response to comment 144-2 for more discussion on shared parking analysis. Additionally, parking deficits are not significant environmental impacts in an urban context under current CEQA law. Thus, parking availability in an urban environment (such as the project site) is not an environmental impact under CEQA. Given this, no change or addition to the environmental analysis is required as a result of this comment. See Topical Response No. 1 – Parking Plan for more discussion on parking.

I37-5 The comment raises concern for the number of access points on site, especially during a wildfire event. Section 4.16, Transportation, of the Draft EIR addressed impacts related to emergency access and concluded less than significant impacts would occur in accordance with local requirements, including the City design standards (Draft EIR, pp. 4.16-19 and 4.16-20). For informational purposes, emergency access mitigation related to wildfire is included in Section 4.19, Wildfire, of the Draft EIR. Given this, no change or addition to the environmental analysis included in the Draft EIR is required.

I37-6 The comment expresses opposition to the construction phasing of the proposed project. The comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

Regarding odors, the Draft EIR includes analysis under Section 4.2, Air Quality, in which less than significant impacts were determined. As detailed in the Draft EIR, the project would comply with South

Coast Air Quality Management (SCAQMD) District Rule 1113, which limits the amount of volatile organic compounds in architectural coatings and solvents. In addition, the project would comply with the applicable provisions of the California Air Resources Board Air Toxics Control Measure regarding idling limitations for diesel trucks. Through mandatory compliance with SCAQMD Rules, no construction activities or materials are expected to create objectionable odors affecting a substantial number of people (Draft EIR, p. 4.2-40). Given this, no change or addition to the environmental analysis included in the Draft EIR is required.

I37-7 The comment expresses opposition to the construction of roundabouts on Wiley Canyon Road. The comment does not include specific comments related to the adequacy of the Draft EIR; therefore, no further response is required. Nevertheless, the comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

I37-8 The comment suggests improvements to Calgrove Boulevard. This comment is not related to the adequacy of the Draft EIR; therefore, no response is required.

I37-9 The comment raises concerns for soil stability on the project site as a result of construction activities. For informational purposes, the Draft EIR includes analysis related to geology and soils, as further detailed in Section 4.6, Geology and Soils. Furthermore, construction activities on site would be required to comply with the engineering recommendations included in the project's geotechnical report (Appendix E to the Draft EIR).

I37-10 The comment raises concerns for wildlife corridors since the commentator has seen dead wildlife on Wiley Canyon Road with the conclusion that the water of the South Fork of the Santa Clara River attracting them. As stated in section 4.3.1.2 of the Draft EIR, wildlife corridors link together areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. It is expected that the commentator is seeing local wildlife movement. The South Fork of the Santa Clara River is a regional wildlife movement corridor and a majority of this area would be maintained, and the project proposes widening the existing channel to create additional riparian habitat.

I37-11 The comment expresses opposition to the project's proposed design. This comment is similar to Comment I37-3. See Response to Comment I37-3. No further response is required.

I37-12 The comment expresses general opposition to the proposed project. The comment does not include specific comments related to the adequacy of the Draft EIR; therefore, no further response is required. This comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

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Response to Comment Letter I38

Mulberry Mobile Home Park Residents
Submitted by Weston Monroe, Annette Lucas, and Debbie Karloff
April 15, 2024

I38-1 The comment represents City written comment cards with the same comment. The comments express opposition to the proposed project. This comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

Regarding parking, the project applicant does not control the properties surrounding the project site. Under the proposed project, the applicant would provide less parking than required by the Santa Clarita Municipal Code, as detailed in project design feature PDF-TRA-2, Limit Parking Supply. This is due to a shared parking provision, supported by a parking demand study (Appendix K-4), which would reduce the required parking on site by 13% and reduce vehicle miles traveled by 1.23% (Draft EIR, p. 4.16-17). As detailed further in Appendix K-4, the project proposes to provide 966 parking spaces, including 582 spaces reserved for multifamily residents and 109 spaces reserved for senior living residents. The remaining would be shared. According to Appendix K-4, the project's proposed parking supply would be sufficient and would accommodate all uses. See Appendix K-4 and response to comment 144-2 for more discussion on shared parking analysis. Parking availability in an urban environment (such as the project site) is not an environmental impact under CEQA. Given this, no change or addition to the environmental analysis is required as a result of this comment. See Topical Response No. 1 – Parking Plan for more discussion on parking.

Regarding ground-disturbing construction activities, the Draft EIR analyzes air quality impacts within Section 4.2, Air Quality, of the Draft EIR. Dust is typically captured within discussions on particulate matter. Particulate matter air pollution is a mixture of solid particles and liquid droplets found in the air (Draft EIR, p. 4.2-8). For the purposes of the environmental analysis, project construction activities were estimated by assuming a conservative scenario and applying the mobile source and fugitive dust emissions factors. As a result of air quality modeling (included in Appendix B of the Draft EIR), the project would not exceed South Coast Air Quality Management District (SCAQMD) thresholds of significance. Additionally, the project would be required to comply with existing rules and regulations, including SCAQMD Rule 403, Fugitive Dust, which requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Additionally, projects must utilize the best available control measures. Thus, impacts would be less than significant. For more discussion regarding dust-related impacts, see Section 4.2 of the Draft EIR. No change or addition to the environmental analysis included in the Draft EIR is required.

While Valley Fever predominantly occurs in Kern and King County, incidences in Valley Fever in Los Angeles County have occurred (CDPH 2024). While there is currently no evidence of Valley Fever spores on-site, as detailed in Section 4.2, Air Quality, project activities would be subject to South Coast Air Quality Management District (SCAQMD) rules, including Rule 402, Nuisance, and Rule 403, Fugitive Dust, which prohibit the discharge from any source of air contaminants or other materials which could cause injury, determent, nuisance, or annoyance that may endanger the comfort, health, or safety of the public as well as requiring best available control measures to prohibit visible particulate matter from crossing any property line. To demonstrate compliance with SCAQMD Rule 403, projects must submit a fugitive dust control plan describing the methods of compliance during construction.

Compliance with these rules will protect offsite sensitive receptors from the potential exposure to Valley Fever spores.

> CDPH (California Department of Public Health). 2024. Valley Fever in California Dashboard. Page last updated January 16, 2024. Accessed August 22, 2024. https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/ValleyFeverDashboard.aspx.

Regarding construction noise, the Draft EIR determined significant and unavoidable impacts would occur during construction due to an exceedance in noise standards. As such, mitigation was incorporated to reduce impacts; however, even with MM-NOI-1 and MM-NOI-2, construction noise would remain significant. However, impacts would be temporary and cease upon the completion of the project's proposed construction. Additionally, the Draft EIR includes analysis of Alternative 4, Construction Noise Setback Alternative, which would redesign the proposed project with a 200-foot open space/landscaped buffer, among other components. As a result, Alternative 4 would eliminate the significant and unavoidable impact related to construction noise.

Regarding noticing, under CEQA, it is the responsibility of the City as the lead agency to comply with the noticing requirements identified within the CEQA guidelines. As such, in accordance with CEQA Guidelines Section 15087, the City provided a public notice of availability (NOA) of the Draft EIR through more than the required procedures. The City published the NOA in a newspaper of general circulation (i.e., The Santa Clarita Valley Signal), posted the notice on site, and mailed to owners and occupants of properties contiguous to the parcels on which the project is located (e.g., 300-foot radius). Additionally, a public notice was posted ahead of the Planning Commission meeting on March 19, 2024. Given this, the City's noticing and posting procedures for the proposed project met all state and local requirements.

I38-2 The comment raises concern for impacts to wildlife. Section 4.3, Biological Resources, of the Draft EIR, includes impact analysis related to wildlife. Impacts were determined to be less than significant with mitigation incorporated. See Section 4.3 for more discussion. Additionally, the comment raises concern for drainage, run-off, and flooding during construction. Section 4.9, Hydrology and Water Quality, of the Draft EIR, includes impact analysis related to construction activities. Impacts were determined to be less than significant. In addition, the analysis was supported by technical studies, Hydrology Technical Memorandum, included as Appendix I to the Draft EIR. The comment does not raise specific concerns related to the adequacy of the Draft EIR; therefore, no further response is required.

I38-3 The comment raises concern for noise, traffic, and air quality. Regarding noise and air quality, this comment is similar to Comment I38-1. See Response to Comment I38-1. No further response is required.

Regarding traffic, although CEQA Guidelines Section 15064.3 states that traffic delay using level of service (LOS) metric is no longer considered a significant environmental impact under CEQA, a summary of project's traffic analysis using the LOS metric is provided in Appendix K-5 of the Draft EIR. As shown, an operational analysis of intersections was conducted, in which two intersections (I-5 Southbound at Calgrove Boulevard and I-5 Northbound at Calgrove Boulevard) would be significantly affected during the existing plus project condition, among others during the interim year cumulative scenario. As such, the project would construct or pay its fair-share towards improvements required to reduce operational deficiencies, including improvements to Wiley Canyon Road (Appendix K-5). These improvements would be included as conditions of approval for the project. Given this, the project would

be required to comply with City requirements to reduce impacts associated with the project. No change or addition to the environmental analysis included in the Draft EIR is required.

I38-4 The comment raises concern for traffic, air quality, and public safety. Regarding traffic and air quality, see Responses to Comment I38-1 and I38-3 for more discussion.

Regarding public safety, the Draft EIR includes analysis of impacts to public services, including impacts to police protection services. As further detailed in Section 4.14, Public Services, of the Draft EIR, the project would comply with state and local regulations by providing adequate lighting for recreational amenities and improved open space areas as well as along pedestrian pathways, circulation ways, paths of egress, and within parking lots. These design elements would increase safety and decrease the likelihood of crime occurring. Impacts were determined to be less than significant.

I38-5 The comment expresses concerns about traffic, flooding, and runoff. However, the comment is not specific on the concerns raised. The Draft EIR analyzes impacts related to traffic within Section 4.16, Transportation, and impacts related to flooding and runoff within Section 4.9, Hydrology and Water Quality. Overall, the comments do not raise specific concerns related to the adequacy of the Draft EIR; therefore, no further response is required.

I38-6 The comment expresses concern for traffic and safety. See Response to Comment I38-3 for more discussion. No further response is required.

I38-7 The comment expresses concern for air quality. See Response to Comment I38-1 for more discussion. No further response is required.

I38-8 The comment expresses concern for gentrification and expresses concern for low-income people. State CEQA Guidelines Section 15064(e) states, “economic and social changes resulting from a project shall not be treated as significant effects on the environment.” Accordingly, the commenter’s concern for gentrification does not pertain to the project’s impacts on the environment pursuant to CEQA.

I38-9 The comment represents City written comment cards with the same comment as shown for Comment I38-1. As such, see Response to Comment I38-1.

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Response to Comment Letter I39

Brenda Miranda
April 16, 2024

I39-1 The comment expresses general opposition to the proposed project. The comment does not include specific comments related to the adequacy of the Draft EIR; therefore, no further response is required.

I39-2 The comment raises concern for parking as a result of the project. The project applicant does not control the properties surrounding the project site. Under the proposed project, the applicant would provide less parking than required by the Santa Clarita Municipal Code, as detailed in project design feature PDF-TRA-2, Limit Parking Supply. This is due to a shared parking provision, supported by a parking demand study (Appendix K-4), which would reduce the required parking on site by 13% and reduce vehicle miles traveled by 1.23% (Draft EIR, p. 4.16-17). As detailed further in Appendix K-4, the project proposes to provide 966 parking spaces, including 582 spaces reserved for multifamily residents and 109 spaces reserved for senior living residents. The remaining would be shared. According to Appendix K-4, the project's proposed parking supply would be sufficient and would accommodate all uses. See Appendix K-4 for more discussion. Moreover, in *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002), 102 Cal.App.4th 658*, the court found that parking deficits were not significant environmental impacts in an urban context. Thus, parking availability in an urban environment (such as the project site) is not an environmental impact under CEQA. Given this, no change or addition to the environmental analysis is required as a result of this comment. See Topical Response No. 1 – Parking Plan for more discussion on parking.

Additionally, the comment objects to the findings in the Parking Demand Study, included as Appendix K-4 of the Draft EIR. While a parking demand study is included in the Draft EIR, parking is not a topic evaluated within CEQA. No further response is provided.

I39-3 The comment raises concern for traffic and evacuation planning. Although CEQA Guidelines Section 15064.3 states that traffic delay using level of service (LOS) metric is no longer considered a significant environmental impact under CEQA, a summary of project's traffic analysis using the LOS metric is provided in Appendix K-5 of the Draft EIR. As shown, an operational analysis of intersections was conducted, in which two intersections would be significantly affected. The project would construct or pay its fair-share towards improvements required to reduce operational deficiencies, including improvements to Wiley Canyon Road (Appendix K-5). These improvements would be included as conditions of approval for the project.

Regarding evacuations, as described in Section 4.19, Wildfire, modeling was performed and determined the project's impact would be less than significant with the incorporation of design and circulatory improvements. For more information regarding evacuation, see Appendix N, Wildfire Evacuation Plan, of the Draft EIR.

Overall, the comment does not raise specific concerns related to the adequacy of the Draft EIR; therefore, no further response is required.

I39-4 The comment notes the Los Angeles County Sheriff's Department closed Wiley Canyon Road as a result of a wildfire event. The comment does not raise specific concerns related to the adequacy of the Draft

EIR; however, the Draft EIR includes analysis on evacuation planning. For more information, see Section 4.19, Wildfire, and Appendix N, Wildfire Evacuation Plan, of the Draft EIR.

I39-5 The comment generally objects to findings of the environmental analysis. However, the comment does not raise specific concerns related to the adequacy of the Draft EIR; therefore, no further response is required.

I39-6 The comment expresses support for project alternatives that would result in single-family residences or a neighborhood park with an enclosed dog park. While the Draft EIR does not include a project alternative with single-family residential land uses, the EIR considers Alternative 4, Construction Noise Setback Alternative, which includes 47 single-family detached units along with an assisted living facility and 237 multifamily apartments. In addition, Alternative 3, Private Recreational Facility, proposes a 10,000 square foot clubhouse/restaurant, eight tennis courts, seven pickleball courts, a soccer field, a football field, baseball field and outdoor basketball court.

In response to inquiries from the Planning Commission regarding amenities for children and pets, the applicant submitted a revised landscape concept for consideration. The updated landscape concept includes a children's play area with playground equipment and bench seating. In addition, a dog park has been incorporated and several pet waste stations have been identified throughout the project site. Topical Response No. 2 – Residential Amenities for more discussion.

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Response to Comment Letter I40

R. Weston Monroe
April 22, 2024

I40-1 The comment raises concern for planned improvements on Wiley Canyon Road. See Topical Response No. 3 – Traffic and Circulation for roadway configuration of Wiley Canyon Road and current CEQA guidelines and requirements for transportation impact analysis. The project has been appropriately analyzed in the DEIR using the VMT metric. The project's traffic analysis uses the existing traffic volumes to analyze the Existing Conditions in the study area. The Future or Interim conditions include traffic from recently approved or pending projects in the area as well as projected growth which would occur between Existing and Interim Conditions (year 2028) obtained from the Santa Clarita Valley Consolidated Traffic Model (SCVCTM). The SCVCTM buildout condition represents the General Plan buildout of land uses which could be year 2035 or later. The General Plan buildout would not necessarily occur by year 2035 and subsequent update of General Plan would have an appropriate horizon or buildout year. Additionally, regular updates to the traffic model made by the City to include recently approved development projects and major roadway improvements ensures that the traffic model is generating, distributing and assigning trips in an accurate manner. The model outputs are also post-processed and if needed, adjustments are made using professional judgement to ensure that they represent the existing and future conditions within the City accurately. The analysis provided in Appendix K-5 Traffic Analysis is consistent with standard methodology followed for preparing traffic studies in the City and provides accurate results based on the traffic model as well as existing conditions in the City.

I40-2 The comment notes changes to California law, including Senate Bill 9 (SB 9). The comment raises concern for vehicle traffic and population projections. Senate Bill 9 (Atkins, 2021) amended land use provisions within the California Government Code to require ministerial approval of a housing development with no more than two primary units in a single-family zone, the subdivision of a parcel in a single-family zone into two parcels, or both. SB 9 facilitates the creation of up to four single-family housing units in the lot area typically used for one single-family home. As ministerial actions, SB9 eligible housing projects would not be subject to discretionary review under CEQA. Therefore, the potential housing growth and associated population increase is not subject to environmental review. With this statutory exemption, potential future SB 9 developments are not included in the Draft EIR's cumulative analysis. Given this, the comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I40-3 The comment expresses support for proposed roadway improvements throughout the city. The comment compares these improvements to Wiley Canyon Road. This comment is similar to Comment I40-1. See Response to Comment I40-1 for more discussion regarding Wiley Canyon Road.

I40-4 The comment raises concern for planned improvements on Wiley Canyon Road. This comment is similar to Comment I40-1. See Response to Comment I40-1 for more discussion regarding Wiley Canyon Road.

I40-5 The comment describes connection of Via Princessa and Wiley Canyon Road. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. However, for informational purposes, Via Princessa is classified as a six-lane major roadway

in the City's Circulation Element of the General Plan. As Via Princessa transitions to Wiley Canyon Road near the Railroad Avenue overpass, Wiley Canyon Road is planned to continue as a proposed six-lane major roadway to Lyons Avenue. South of Lyons Avenue, Wiley Canyon Road is designated as a secondary highway. This southern segment is not intended to accommodate the same volume of traffic as the northern portion of Wiley Canyon Road or Via Princessa. The designation as a secondary highway is consistent with the City's General Plan and reflects anticipated traffic patterns and capacity needs for that portion of the roadway. Furthermore, Wiley Canyon Road intersects Lyons Avenue, a primary arterial classified as a six-lane major roadway providing a direct access to Interstate 5 as well as to The Old Road.

I40-6 The comment raises concerns for traffic throughout the City. Although CEQA Guidelines Section 15064.3 states that traffic delay using level of service (LOS) metric is no longer considered a significant environmental impact under CEQA, a summary of project's traffic analysis using the LOS metric is provided in Appendix K-5 of the Draft EIR. As shown, an operational analysis of intersections was conducted for existing conditions and future years, in which two intersections would be significantly affected. As such, the project would construct or pay its fair-share towards improvements required to reduce operational deficiencies, including improvements to Wiley Canyon Road (Appendix K-5). These improvements would be included as conditions of approval for the project. Given this, the project would be required to comply with City requirements to reduce impacts associated with the project. No change or addition to the environmental analysis included in the Draft EIR is required.

I40-7 This comment describes vehicle trips within the city. The comment does not raise specific concerns related to the adequacy of the Draft EIR; therefore, no further response is required.

I40-8 The comment raises concern for planned improvements to Wiley Canyon Road. This comment is similar to Comment I40-1. See Response to Comment I40-1 for more discussion regarding Wiley Canyon Road.

I40-9 The comment raises questions regarding zoning requirements and development standards. The Draft EIR analyzes the project's consistency with the site's zoning within Section 4.10, Land Use and Planning. As further detailed in Section 4.10, the project is consistent with the City's zoning for the project site with the approval of a Conditional Use Permit and Minor Use Permit. Moreover, the project would be subject to Development and Architectural Design Review by the City's Planning Commission, in compliance with the Santa Clarita Municipal Code Section 17.55.040, Architectural and Design Standards. The proposed project would not require a General Plan amendment to the site's existing land use designation of Mixed Use – Neighborhood, as the project would be consistent with the intended use, density, FAR, and height limitations established for the site. Furthermore, the project site is identified as a Special Development Area by the General Plan and is subject to a set of desired development characteristics. No change or addition to the environmental analysis included in the Draft EIR is required.

I40-10 The comment raises concern for planned improvements to Wiley Canyon Road. This comment is similar to Comment I40-1. See Response to Comment I40-1 for more discussion regarding Wiley Canyon Road.

I40-11 The comment requests outreach to agencies involved in the preparation of the General Plan. The Draft EIR was made available for public review and comment pursuant to CEQA Guidelines Section 15087. At the beginning of the public review period, an electronic copy of the Draft EIR and an electronic copy of the Notice of Completion (NOC) and Notice of Availability (NOA) were submitted to the State

Clearinghouse. As such, relevant State agencies (including Caltrans) received electronic copies of the documents, as well as relevant departments associated with the County of Los Angeles. The NOA was also distributed to interested parties, filed with the Los Angeles County Clerk, and published in The Signal. Given this, the City's noticing and posting procedures for the proposed project met all state and local requirements.

I40-12 The comment generally compares the project to other roadway improvements throughout the city. The comment appears to be a summary of Comment I40-3, above. See Response to Comment I40-3 for more discussion. No further response is required.

I40-13 The comment raises concern for ADU, JADU, and SB 9 laws. The comment appears to be similar to Comment I40-2. See Response to Comment I40-2 for more discussion.

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Response to Comment Letter I41

Annette Lucas
April 22, 2024

I41-1 The comment notes the letter was provided after the public review period for the Draft EIR. Although the City stated the Draft EIR would be available for public comment for a 45-day period starting on March 1, 2024 and ending on April 15, 2024, the City has provided responses to comments below.

I41-2 The comment asserts the proposed project should propose 4 lanes on Wiley Canyon Road. As discussed in the Draft EIR, Wiley Canyon Road is designated by the General Plan as a Secondary Highway, which is a four-lane road configuration, along the project frontage. However, the proposed project improvements would maintain a two-lane roadway configuration. For more discussion regarding traffic and circulation, see Topical Response No. 3 – Traffic and Circulation.

Regarding traffic on freeway ramps, the Draft EIR includes analysis of the project's potential to impact to intersections meeting the I-5 freeway. Figure 1-1 of Appendix K-5 identifies the study area. For example, as demonstrated in Section 4.16, Transportation, of the Draft EIR, the project would include improvements to Caltrans facilities in the study area, including the northbound ramp to the I-5 freeway at Lyons Avenue, in which the project applicant would pay its fair share towards traffic signal adjustment/retiming. Given this, no change or additions to the analysis in the Draft EIR are required as a result of this comment.

I41-3 The comment asserts the Draft EIR did not consider future growth. The methodology contained in Appendix K-5, Traffic Analysis, includes multiple scenarios, including the interim year cumulative (2028) conditions with and without the project, which considers traffic generated by all known and reasonably anticipated related projects in the proximity of the study area. Given this, the Draft EIR adequately considers future traffic conditions. No change to the environmental analysis is required.

Regarding earthquake and wildfire risk, the Draft EIR analyzes the project's potential to exacerbate existing environmental conditions. The comment does not contain specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. However, see Section 4.6, Geology and Soils, for more discussion on faults, and Section 4.19, Wildfire, for more discussion on wildfire risk.

I41-4 This comment is similar to Comment I41-2. See Response to Comment I41-2. No further response is required.

I41-5 The comment raises concern for hospital capacity as a result of the project. The comment states another commenter provided a detailed comment on this topic. Comment Letter I6 raises concerns for hospital capacity. See Response to Comment Letter I6 for more discussion.

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Response to Comment Letter I42

R. Weston Monroe
March 26, 2024

I42-1 The comment is the same as Comment I22-19. See Response to Comment I22-19 for more discussion. No further response is required.

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Response to Comment Letter I43

Jane Saporito Stucker
April 4, 2024

I43-1 The comment expresses opposition to the project, and specifically the proposed roundabouts on Wiley Canyon Road. The comment also raises concern for flooding, liquefaction, soil import and grading activities, air quality impacts, and parking. Overall, the comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. Nevertheless, the comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR. In addition, for informational purposes, the Draft EIR includes analysis on each of the aforementioned topics.

Regarding flooding, the Draft EIR discloses the project site is located within a high risk/special flood hazard area (SFHA), as further illustrated on Figure 4.9-1, Flood Hazard Zones. Furthermore, Section 4.9, Hydrology and Water Quality, analyzes the impacts related to alteration of drainage patterns, flood flows, and flood hazards. Impacts were determined to be less than significant with the incorporation of MM-HYD-1, which requires the applicant to submit an application for a Letter of Map Revision (LOMR) from the Federal Emergency Management Agency (FEMA) along with a hydrology and hydraulics report prepared by a California licensed engineer. As described in Section 4.9, with all modifications to site grading and/or bank protection measures implemented as approved by FEMA and the City, the project site would be located outside of a SFHA such that flooding impacts would be reduced to less than significant levels.

Regarding liquefaction, soil import, and grading, the Draft EIR analyzes the project's potential to exacerbate existing conditions under Section 4.6, Geology and Soils. As detailed in Section 4.6, the project site was evaluated in a site-specific preliminary geotechnical investigation that considered the breadth of geotechnical hazards present including characteristics of underlying materials, topography, and potential for liquefaction. The geotechnical evaluation of the project also determined that with implementation of site preparations including earthwork and recompaction of loose soils consistent with building code requirements. Adherence to applicable building code requirements would reduce impacts related to liquefaction to less than significant levels.

Regarding air quality, the Draft EIR analyzes the project's potential air quality impacts. The Draft EIR analyzes air quality impacts within Section 4.2, Air Quality, of the Draft EIR. For the purposes of the environmental analysis, project construction activities were estimated by assuming a conservative scenario and applying the mobile source and fugitive dust emissions factors. As a result of air quality modeling (included in Appendix B of the Draft EIR), the project would not exceed South Coast Air Quality Management District (SCAQMD) thresholds of significance. Thus, impacts would be less than significant.

Regarding parking,. As detailed further in Appendix K-4, the project's proposed parking supply would be sufficient and would accommodate all uses. See Appendix K-4 for more discussion. Parking availability in an urban environment (such as the project site) is not an environmental impact under CEQA. Given this, no change or addition to the environmental analysis is required as a result of this comment. See Topical Response No. 1 – Parking Plan for more discussion on parking.

I43-2 The comment raises concerns for pet waste. This comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. However, in response to inquiries from the Planning Commission regarding amenities for children and pets, the applicant has submitted a revised landscape concept for consideration. The updated landscape concept includes a children's play area with playground equipment and bench seating. In addition, a dog park has been incorporated and several pet waste stations have been identified throughout the project site. Topical Response No. 2 – Residential Amenities for more discussion.

Additionally, the comment raises concern for evacuation planning. As further described in Section 4.19, Wildfire, of the Draft EIR, modeling was performed and determined the project's impact would be less than significant with the incorporation of design and circulatory improvements. For more information regarding evacuation, see Appendix N, Wildfire Evacuation Plan, of the Draft EIR.

I43-3 The comment states the City should acquire the project site for open space. The Draft EIR analyzes an alternative to the proposed project with a similar land use as requested by the comment. Alternative 3, Private Recreational Facility Alternative, would include a 10,000 square foot clubhouse/restaurant, eight tennis courts, seven pickleball courts, a soccer field, a football field, baseball field and outdoor basketball court. For more details, see Figure 6-2, Alternative 3 Site Plan. This comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

Moreover, the comment expresses opposition to Section 8 housing. CEQA Guidelines Section 15064(e) states, "economic and social changes resulting from a project shall not be treated as significant effects on the environment." Accordingly, the comment does not pertain to the project's impacts on the environment pursuant to CEQA.

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Response to Comment Letter I44

Dianne and Donald Hellrigel
April 10, 2024

I44-1 The comment raises concern for traffic and expresses opposition to the proposed roundabouts on Wiley Canyon Road. Although CEQA Guidelines Section 15064.3 states that traffic delay using level of service (LOS) metric is no longer considered a significant environmental impact under CEQA, a summary of project's traffic analysis using the LOS metric is provided in Appendix K-5 of the Draft EIR. As shown, an operational analysis of intersections was conducted, in which two intersections would be significantly affected. The project would construct or pay its fair-share towards improvements required to reduce operational deficiencies, including improvements to Wiley Canyon Road (Appendix K-5). These improvements would be included as conditions of approval for the project. Given this, no change or addition to the environmental analysis is required as a result of this comment. The commenter's opposition will be provided to the City's decision makers for consideration of the Final EIR.

I44-2 The comment asserts the project's proposed parking is inadequate. The project applicant does not control the properties surrounding the project site. Under the proposed project, the applicant would provide parking complying with the Santa Clarita Municipal Code.. Nevertheless, a Parking Demand Study was prepared for the proposed project, Appendix K-4, the project's proposed parking supply would be sufficient and would accommodate all uses. See Appendix K-4 for more discussion.

The parking ratio used for the Parking Demand Study in the project is consistent with ratios included in the Institute of Transportation Engineers Parking Generation Manual, 6th Edition (October 2023) for multi-family housing units. Based on surveys conducted in various states including California and as recently as 2020s, a one-bedroom multifamily housing has a peak parking demand of 0.93 parking space per unit, and a two or more-bedroom multifamily housing has a peak parking demand of 1.27 parking space per unit. When the 0.93 parking space per unit ratio is applied to 32 studios and 144 one-bedroom units, then a parking demand of 164 spaces would be generated for one-bedroom unit. It should be noted that the parking demand for mid-rise or high-rise multifamily housing has a lower parking demand ratios per unit and some of the project buildings would be considered mid-rise based on number of levels. When the 1.27 parking space per unit ratio is applied to 180 two-bedroom units and 23 three-bedroom units, then a parking demand of 258 spaces is generated for two- and three-bedroom units. Therefore, a total peak demand for one-bedroom, two- and three-bedroom multifamily units is estimated to be approximately 421 parking spaces. The project includes 512 reserved spaces for the residential units and 38 visitor parking spaces for a total of 540 parking spaces for the residential units. Therefore, the peak parking demand analysis provided herein is conservative.

Note that AB 1317 requires developers to unbundle parking costs from rent to make the housing cost more affordable and AB 2097 removed the minimum parking requirements near transit facilities. Additionally, SB 743 requires that developments reduce VMT by providing alternatives other than automobiles for personal travel. The project is served by transit and will add bus stops near its access driveway to provide transit access to its residents.

Parking availability in an urban environment (such as the project site) is not an environmental impact under CEQA. Given this, no change or addition to the environmental analysis is required as a result of this comment. See Topical Response No. 1 – Parking Plan for more discussion on parking.

I44-3 The comment expresses support for Alternative 3, Private Recreational Facility. As such, this comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

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Response to Comment Letter I45

Michele Moline
April 15, 2024

I45-1 The comment states the evacuation analysis contained in the Draft EIR is insufficient. This comment is speculative and suggests that Wiley Canyon Road would not be available as an emergency evacuation route during a wildfire occurring east of the project site due to the need to use the road for emergency and fire apparatus.

As discussed in Chapter 3, Project Description and Section 4.16, Transportation, the project would include a number of off-site infrastructure improvements, including street improvements along Wiley Canyon Road and its intersecting streets, including Fourl Road, Canerwell Street, Valley Oak Court, and Calgrove Boulevard comprised of three new roundabouts, changes to existing directional signage, and the intersection of Calgrove Boulevard and I-5 located at the southwest corner of the project site would be signalized. The project would also include emergency access via Hawkbryn Avenue at the northwestern corner of the site.

Public access to the project would be provided by a private street connection to Wiley Canyon Road. The primary project entrance would be located at the northern end of the site and controlled by a single-lane roundabout. An emergency vehicle-only access would be provided by a driveway on Hawkbryn Avenue. The project would also include the installation of off-site roundabouts along Wiley Canyon Road at the project's entrance, Canerwell Street, and at Calgrove Boulevard. Improvements along Wiley Canyon Road in the vicinity of the project frontage would include a Class I bike path and walking trail on the west side of Wiley Canyon Road and bus bays from the northern boundary of the project site to Calgrove Boulevard.

Additionally, the project proposes a Zone C, Native Brush Thinning Zone within the undeveloped area located east of Wiley Canyon Road. This area would have a minimum setback of 50 to 100 feet (or up to 200 feet from structures), comprised of thinned and maintained vegetation. Zone C would not be irrigated. See Figure 3-6, Conceptual Landscape Plan, for fuel modification zone locations. This thinned and maintained vegetation would result in reduced flame lengths and reduce fire behavior for a wildfire approaching the project site from the east.

While Wiley Canyon Road would be the primary project access route for ingress/egress to the project site, improvements to Wiley Canyon Road and other offsite road improvements would facilitate evacuation from the project site and surrounding areas. The primary roadways that would be used for evacuation from the Project site are Wiley Canyon Road, Calgrove Boulevard, and Lyons Avenue, as shown in Figure 4.19-3, Fire Evacuation Routes. These roads provide access to urbanized areas and major traffic corridors including I-5. During an emergency evacuation from the project, the primary and secondary roadways may provide citizen egress while responding emergency vehicles are inbound. Because the roadways are all designed to meet or exceed County of Los Angeles requirements, unobstructed travel lane widths, shoulders, vehicle turnouts, adequate parking, turning radius, grade maximums, signals at intersections, and roadside fuel modification zones, potential conflicts that could reduce the roadway efficiency are minimized, allowing for smoother evacuations.

I45-2 The comment raises concern for communication with the Los Angeles County Fire Department and notes planned improvements to Wiley Canyon Road. The proposed project has been reviewed by the LACFD and cleared for public hearing. In addition, the LACFD has provided conditions that would be incorporated into the conditions of approval for the project. For the purposes of CEQA, the LACFD was noticed along each phase of the environmental review process. See Section 1.3 of this Final EIR for more discussion.

I45-3 The comment raises concern for sheltering in place. As explained in Section 3.1 of the Wildfire Evacuation Study (Appendix N), during a wildfire or other emergency situation where off-site evacuation is not advised by the primary or alternate evacuation routes, and conditions are such that open air exposure would be unhealthy or unsafe, the Wiley Canyon population will be directed to shelter in place.

Sheltering-in-place is the practice of going or remaining indoors during or following an emergency event. This procedure is recommended if there is little time for the public to react to an incident and it is safer for the public to stay indoors for a short time rather than travel outdoors. Sheltering in place is possible due to the ignition resistant construction materials and irrigated landscape that creates a fire hardened development.

As discussed in 4.19.4 of the EIR, the project would be developed in accordance with Santa Clarita and Los Angeles County Fire Codes which are at least as stringent as the 2022 California Fire Code. These codes include provisions for building materials, infrastructure, and defensible space, site access, and fire protection systems (e.g., water, fire flow, fire hydrants, interior fire sprinklers). Each of the proposed dwelling units would comply with the enhanced ignition-resistant construction standards of the 2025 California Building Standards Code (Chapter 7A). These requirements address roofs, eaves, exterior walls, vents, appendages, windows, and doors and result in hardened structures that have been proven to perform at high levels (resist ignition) during the typically short duration of exposure to burning vegetation from wildfires. Further, infrastructure, such as project roads, water service, fire hydrants, and automatic fire sprinkler systems would be implemented in accordance LACFD Standards, and nationally accepted fire protection standards.

I45-4 The comment raises comments and questions about the Paradise Fire. The comment seeks information that is outside the scope of a CEQA analysis. No additional response is required.

I45-5 The comment raises concern for emergency access for the adjacent mobile home park. As discussed in Section 4.19.4 in the Draft EIR, the project will not impede existing emergency access to the mobile home park. Due to the circulatory improvements associated with the project and the results of the evacuation analysis, it is found that implementation of the proposed project would increase emergency access to the project site and nearby uses and would not impair an adopted emergency response plan or emergency evacuation plan.

The comment also states that mobile home parks are not hardened structures, which is accurate. The existing mobile home park located north of the project site is vulnerable to ember intrusion and structure ignition from a wildfire and is made more vulnerable by the adjacent undeveloped project site that has varied vegetation but mostly consists of non-native vegetation that has established after human disturbance. The project would replace the vegetated undeveloped land directly south of the mobile home park and replace it with fire hardened structures and maintained landscaping. As such, the site would be largely converted from readily ignitable fuels to structures and landscaped areas,

consisting of ignition resistant building materials. The project would be developed according to all existing building codes and fire codes, as indicated in the Santa Clarita Municipal Code, which adopts the Los Angeles County Fire Code by reference, which makes local amendments to the California Fire Code.

I45-6 The comment raises concern for LACFD review and Wiley Canyon Road. Additionally, the comment raises concern for flood inundation, wildfire risk, and proximity to adjacent land uses. This comment is similar to Comment I45-2. See Response to Comment I45-2 for more discussion.

I45-7 The comment raises concern for fire protection service levels as a result of the project. As described in Section 4.14, Public Services, fire protection services during operations would increase in demand. However, the applicant would be required to pay development fees established by the LACFD to offset the costs of additional resources. The LACFD participates in mutual aid agreements, which would also offset demand. Moreover, the project would be designed and constructed in accordance with applicable fire code standards. The Draft EIR's conclusions were made in coordination with the LACFD through available online resources and comment letters submitted.

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Response to Comment Letter I46

R. Weston Monroe
April 15, 2024

I46-1 The comment objects to the traffic analysis contained in the Draft EIR and requests mitigation measures. In addition, the comment notes the General Plan's planned improvements for Wiley Canyon Road. However, the comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I46-2 The comment requests the project be revised to expand Wiley Canyon Road to 4 lanes. As discussed in the Draft EIR, Wiley Canyon Road is designated by the General Plan as a Secondary Highway, which is a four-lane road configuration, along the project frontage. However, the proposed project improvements would maintain a two-lane roadway configuration. For more discussion regarding traffic and circulation, see Topical Response No. 3 – Traffic and Circulation.

I46-3 The comment states the Draft EIR is deficient and needs to be revised. The comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I46-4 The comment raises concern for the project's proposed design for Wiley Canyon Road. This comment is similar to Comment I46-2. See Response to Comment I46-2 for more discussion.

I46-5 The comment asserts the Draft EIR does not include feasible mitigation measures. The comment states the project's proposed design for Wiley Canyon Road does not mitigate traffic impacts and requests 4 lanes along the roadway. As discussed in the Draft EIR, Wiley Canyon Road is designated by the General Plan as a Secondary Highway, which is a four-lane road configuration, along the project frontage. However, the proposed project improvements would maintain a two-lane roadway configuration. For more discussion regarding traffic and circulation, see Topical Response No. 3 – Traffic and Circulation.

I46-6 The comment raises concern for impacts associated with Senate Bill 9 (Atkins, 2021). SB 9 amended land use provisions within the Government Code to require ministerial approval of a housing development with not more than two primary units in a single-family zone, the subdivision of a parcel in a single-family zone into two parcels, or both. SB 9 facilitates the creation of up to four single-family housing units in the lot area typically used for one single-family home. As ministerial actions, SB9 eligible housing projects would not be subject to discretionary review under CEQA. Therefore, the potential housing growth and associated population increase is not subject to environmental review. With this statutory exemption, potential future SB 9 developments are not included in the Draft EIR's cumulative analysis. Given this, the comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR; therefore, no further response is required.

I46-7 The comment raises concerns for the project's construction by providing an example within with the City. This comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. However, the comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

I46-8 The comment raises concerns for potential impacts associated with planned improvements to Via Princessa. Via Princessa is a 6-lane roadway, north of SR-14 from Jason Lane to Whites Canyon Road/Via Princessa intersection. Between Whites Canyon Road/Via Princessa intersection and Rainbow Glen Road, this roadway is constructed with 4-lanes. West of Rainbow Glen Road to Sheldon Avenue, this roadway is constructed with 2-lanes. It is our understanding that Via Princessa will be constructed from its current terminus, west of Sheldon Avenue to Golden Valley Road with the development of Princessa Crossroads project. Full details of Via Princessa connection are not available at this time and it's being reviewed as a Capital Improvement Project in the City. Currently, west of Claibourne Lane, the 4-lane segment of Via Princessa transitions to a 4-lane segment of Wiley Canyon, at the bridge over Newhall Creek and Railroad Avenue. Wiley Canyon is constructed as a four-lane roadway up to Evans Avenue and then transitions to a two-lane roadway with a two-way left turn lane until Powell Drive. From Powell Drive to Calgrove Boulevard, Wiley Canyon Road is constructed as a two-lane roadway with left turn pockets at selected intersections. Therefore, the transition of Wiley Canyon Road from four-lane to a two-lane roadway currently exists and would not be impacted if Via Princessa is constructed east of Claibourne to Golden Valley Road, in the future. Contrary to the commentor's belief, the two-lane segment of Wiley Canyon in the vicinity of the project constructed with three roundabouts would not make it attractive as a thoroughfare because it would not provide additional capacity or speed to through traffic. Therefore, the completion of missing segments of Via Princessa would not result in increased traffic along Wiley Canyon Road in the vicinity of the project.

The comment raises concerns for potential impacts associated with planned improvements to Via Princessa. Via Princessa is classified as a six-lane major roadway in the City's Circulation Element of the General Plan. As Via Princessa transitions to Wiley Canyon Road near the Railroad Avenue overpass, Wiley Canyon Road is planned to continue as a proposed 6-lane major roadway to Lyons Avenue. This project does not propose or result in any impacts to unbuilt portions of Via Princessa.

North of Lyons Avenue, Wiley Canyon has sufficient right-of-way to accommodate six-lanes if future traffic volumes warrant. South of Lyons Avenue, Wiley Canyon Road is designated as a secondary highway. Currently, it operates as a four-lane roadway between Lyons Avenue and Evans Avenue and transitions to a two-lane roadway from Evans Avenue to Calgrove Blvd. Therefore, the transition from a four-lane to a two-lane roadway currently exists on Wiley Canyon Road and is not introduced by the proposed project.

The proposed project is expected to generate approximately 3,500 daily trips. By comparison, the City's General Plan had previously assumed build out of the project site would generate approximately 27,000 daily trips. That original assumption supported the designation of Wiley Canyon Road as a four-lane roadway in the General Plan.

Given the significantly lower trip generation of the proposed project relative to the assumptions in the General Plan, there is no nexus between the proposed project and the need to widen Wiley Canyon Road to four lanes. Based on the projected future buildout of the Santa Clarita Valley, it is not expected the southern portion of Wiley Canyon Road will require expansion to four lanes. Forecasted volumes fall well within the capacity of a two-lane roadway. Nonetheless, Traffic and Transportation Planning staff reviewed the proposed right- of-way width along Wiley Canyon Road in conjunction with the proposed development. It was determined that, in the unlikely event four-lanes ever became necessary in the future, the corridor, at its narrowest point, could be configured to accommodate four-lanes.

I46-9 The comment raises concern for the Draft EIR's traffic analysis because of its size and considers the location of the site within a floodplain unsafe. The comment wrongly states that the project would not provide parking or air quality benefits and considers the roundabouts proposed along Wiley Canyon Road to be inconvenient and not an environmentally better option compared to signals. As explained in Topical Response No. 3 – Traffic and Circulation and response to comment I44-2, the project provides parking based on an industry standard methodology for all proposed uses. The project's air quality analysis has been conducted per CEQA guidelines and requirements. As shown in research included in the NCHRP Report[8], the roundabout has proven to be an environmentally superior alternative to a traffic signal because it reduces delay for all vehicles and movements. It is also considered a traffic calming option on streets that may be used as a thoroughfare. For a faster route during non-peal hours, and to access Lyons Avenue, the residents in the area have an option to travel on I-5 using on- and off- ramps on Calgrove Boulevard and Lyon Avenue.

I46-10 The comment represents a table provided in the City's General Plan Circulation Element. This comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. However, this was referenced in Comment I46-8. See Response to Comment I46-8 for more discussion.

I46-11 The comment expresses opposition to the Draft EIR. This comment does not contain any specific concerns related to the adequacy or accuracy of the environmental analysis in the Draft EIR. However, the comment will be provided to the City's decision makers for their review and consideration as part of this Final EIR.

[8] See page 2-20, Chapter 2/Roundabout Consideration, 2.3.7 Emergency Vehicles. National Academies of Sciences, Engineering, and Medicine. 2010. Roundabouts: An Informational Guide – Second Edition. Washington, DC: The National Academies Press. https://doi.org/10.17226/22914.

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3 Changes to the Draft EIR

3.1 Introduction

These revisions are shown below and are categorized by section number and page number. Text from the Draft EIR that has been removed is shown in strikethrough (i.e., ~~strikethrough~~), and text that has been added as part of the Final EIR is shown as underlined (i.e., <u>underline</u>). Revisions are shown with surrounding sentences for context. These errata merely clarify and corrects minor facts and does not constitute "substantial revisions" requiring recirculation of the Draft EIR, as set forth in CEQA Guidelines, Section 15073.5.

3.2 Errata

Chapter 1, Executive Summary

Section 1.5, Areas of Known Controversy, Pages 1-4 and 1-5

A scoping meeting was held at the City of Santa Clarita City Hall on April 14, 2022. The purpose of this meeting was to seek input from public agencies and the general public regarding the potential environmental impacts of the proposed project. Approximately 58 people attended the scoping meeting. The public comments, questions, and concerns that were received at the scoping meeting generally included the following areas:

- **Aesthetics** – changes to existing visual character and nighttime lighting
- **Air quality** – emissions during construction and from operational traffic
- **Biological resources** – disruption in animal travel patterns, nighttime lighting impacts to wildlife movement, impacts to sensitive wildlife and vegetation, loss of oak trees
- **<u>Geology and soils</u>** – <u>construction impacts on soil pollution</u>
- **Hazards and hazardous materials** – wildland fire, emergency evacuation routes becoming jammed
- **Hydrology and water quality** – water quality conditions beneath the site
- **Land use and planning** – ~~change from Open Space general plan and zoning designations, consistency with the Sand Canyon Special Standards District~~ <u>housing density of the proposed project, impacts associated with circulation and local property value</u>
- **Noise** – construction noise and noise increases from operational traffic~~, noise from weddings and events~~
- **<u>Population and housing –</u>** <u>housing density of the proposed project</u>
- **<u>Public services –</u>** <u>increased demand on schools and emergency services; emergency access to the site</u>
- **Recreation** – ~~loss of recreational open space~~ <u>jurisdiction of the proposed on-site recreation areas</u>
- **Transportation** – ~~event traffic,~~ <u>increase in traffic,</u> adequate parking, bicycle/pedestrian safety ~~along Sand Canyon Road~~, ~~equestrian safety along Sand Canyon Road~~, emergency evacuation, <u>adding roundabouts to Wiley Canyon Road</u> ~~along Sand Canyon Road, cut through traffic on Sand Canyon Road, traffic on Highway 14, additional/secondary access to the project site~~

- **Wildfire** – ~~the project site burned in 2016 during the Sand Fire, and during this fire, residents of Sand Canyon had a difficult time evacuating the community due to congestion along Sand Canyon Road~~ the wildfire potential of the project site, cumulative impacts the project would have on wildfire evacuations

This EIR focuses on all potential environmental impacts, including the comments received in response to the NOP.

Section 1.7, Summary of Environmental Impacts and Mitigation Measures, Pages 1-5 through 1-39

Table 1-1 provides a summary of the impact analysis related to the project. Table 1-1 identifies a summary of the significant environmental impacts resulting from the project pursuant to the CEQA Guidelines Section 15123(b)(1). For more detailed discussion, please see Chapter 4 of this Draft EIR. Table 1-1 lists the applicable mitigation measures related to potentially significant impacts, as well as the level of significance after mitigation.

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
AQ-2. Would the project result in a cumulatively considerable new increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Potentially Significant	**MM-AQ-1. Construction Equipment Features.** The project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 50 horsepower (hp) or greater during project construction ~~where available within the Los Angeles region~~. Such equipment shall be outfitted with Best Available Control Technology (BACT), which means a CARB-certified Level 3 diesel particulate filter (DPF) or equivalent.~~[COMPLYING WITH THE LAW IS NOT A MITIGATION MEASURE]~~ An exemption from this requirement may be granted by the City if (1) the City documents equipment with Tier 4 Final engines are not reasonably available, and (2) the required corresponding reductions in criteria air pollutant emissions can be achieved for the project from other combinations of construction equipment. Before an exemption may be granted, the City shall (1) demonstrate that at least three construction fleet owners/operators in Los Angeles region were contacted and that those owners/operators confirmed Tier 4 Final equipment could not be located within Los Angeles County during the desired construction schedule, and (2) the City shall provide evidence to Mitigation Monitoring Coordination (MMC) that the proposed replacement equipment has been evaluated using California Emissions Estimator Model (CalEEMod) or other industry standard emission estimation method, and documentation has been provided to confirm that necessary project-generated emissions reductions are achieved.	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
BIO-1. Would the project 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 Game or U.S. Fish and Wildlife Service?	Potentially Significant	**MM-BIO-1. Crotch Bumble Bee** ~~A pre-construction survey~~ Surveys for Crotch bumble bee shall ~~must~~ be conducted within one year of Project ground-disturbing activities ~~the construction footprint before starting of initial vegetation removal or initial grading activities occurring during the Crotch bumble bee nesting period (February 1 through October 31). The survey must confirm that no nests/hives for Crotch bumble bee are located within the construction area. The pre-construction survey must~~ Surveys shall include 1) a habitat assessment and 2) focused surveys, both of which shall adhere to ~~will be based on recommendations described in~~ the "Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species," released by the California Department of Fish and Wildlife (CDFW) on June 6, 2023, or the most current at the time of construction. The habitat assessment ~~must, at a minimum,~~ shall include historical and current species occurrences; document potential habitat onsite including foraging, nesting, and/or overwintering resources; and identify which plant species are present. ~~For the purposes of this mitigation measure, nest resources are defined as abandoned small mammal burrows, bunch grasses with a duff layer, thatch, hollow trees, brush piles, and man-made structures that may support bumble bee colonies such as rock walls, rubble, and furniture. If nesting resources are present in the impact area, focused surveys will be conducted.~~ ~~The focused survey will~~ Focused surveys shall be performed by a qualified entomologist ~~biologist~~ with	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		appropriate handling permits and familiarity with identification, behavior, and life history of the species. ~~expertise in surveying for bumble bees and include~~ Surveys shall include at least three survey passes that are not on sequential days or in the same week, preferably spaced two to four weeks apart. The timing of these surveys must coincide with the Colony Active Period (April 1 through August 31 for Crotch bumble bee). Surveys shall ~~may~~ occur between one hour after sunrise and two hours before sunset. Surveys shall ~~will~~ not be conducted during wet conditions (e.g., foggy, raining, or drizzling) ~~and surveyors will wait at least one hour following rain~~. Optimal surveys are when there are sunny to partly sunny skies that are greater than 60° Fahrenheit. ~~Surveys may be conducted earlier if other bees or butterflies are flying.~~ Surveys may not be conducted when it is windy (i.e., sustained winds greater than 8 mph). ~~Within non-developed habitats, the biologist must~~ The qualified entomologist shall look for nest/hive resources suitable for bumble bee use. Ensuring that all nest resources receive 100% visual coverage, the qualified entomologist ~~biologist~~ must watch the nest resources for up to five minutes, looking for exiting or entering worker bumble bees. Worker bees should arrive and exit an active nest site with frequency, such that their presence would be apparent after five minutes of observation. If a bumble bee worker is detected, then a representative individual must be identified to species to determine if it is Crotch bumble bee or one of the common, unregulated species. ~~Biologists should be able to view several burrows at one time to sufficiently determine if bees are entering/exiting them depending on their proximity to one another.~~ It is up to the discretion of the biologist regarding the actual survey viewshed	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		limits from the chosen vantage point which would provide 100% visual coverage; this could include a 30- to 50-foot-wide area. If a nest is suspected, the surveyor can block the entrance of the possible nest with a sterile vial or jar until nest activity is confirmed (no longer than 30 minutes). Identification shall include the qualified entomologist ~~will include trained biologists~~ netting/capturing the representative bumble bee in appropriate insect nets, per the protocol in U.S. National Protocol Framework for the Inventory and Monitoring of Bees. ~~The bee must be placed in a clear container for observation and photographic documentation if able. The bee will be photographed using a macro lens from various angles to ensure recordation of key identifying characteristics. If bumble bee identifying characteristics cannot be adequately captured in the container due to movement, the container will be placed in a cooler with ice until the bumble bee becomes inactive (generally within 15 minutes). Once inert, the bumble bee must be removed from the container and placed on a white sheet of paper or card for examination and photographic documentation. Based on implementation of this method on a variety of other bumble bee species, they become active shortly after removal from the cold environment, so photography must be performed quickly. The bumble bee must be released into the same area from which it was captured upon completion of identification.~~ If Crotch bumble bee nests are not detected, no further mitigation is required~~, and no additional surveys would be needed if construction begins within 14 days of the~~	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		~~last survey for a given phase area~~. However, ~~If~~ if construction in a given phase area does not start within a year ~~14 days~~ of the last survey, surveys shall be repeated ~~or if construction in a given~~for that phase area stops. Additionally, if construction stops for 14 days or longer, surveys would be repeated if construction resumes in the nesting season~~commences between February 1 and October 31.~~ ~~The mere presence of foraging Crotch bumble bees would not require implementation of additional minimization measures because they can forage up to 10 kilometers from their nests. If nest resources occupied by Crotch bumble bee are detected within the construction area, no construction activities can occur within 100 feet of the nest, or as determined by a qualified biologist through evaluation of topographic features or distribution of floral resources. The nest resources will be avoided for the duration of the Crotch bumble bee nesting period (February 1 through October 31)~~. Outside of the nesting season, it is assumed that no live individuals would be present within the nest as the daughter queens (gynes) usually leave by September, and all other individuals ~~(original queen, workers, males) die. The gyne is highly mobile and can independently~~ disperse to outside of the construction footprint to surrounding open space areas ~~that support suitable hibernacula resources~~. Following the habitat assessment and focused surveys, a ~~A~~ written survey report shall ~~will~~ be submitted to the City and CDFW prior to Project activities ~~within 30 days of the pre-construction survey~~. The report will include survey methods, weather conditions, a description and	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		map of the survey area, and survey results, including a list of insect species observed and a figure showing the locations of any Crotch bumble bee nest sites or individuals observed. The survey report shall ~~will~~ include the qualifications/resumes of the ~~surveyor(s) and approved biologist~~ entomologist(s) for identification of photo vouchers, detailed habitat assessment, and photo vouchers. If Crotch bumble bee ~~nests~~ are observed, the qualified entomologist shall provide the location of all nests within and adjacent to the Project site. The survey report shall also include the physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. This shall include native plant composition (e.g., density, cover, and abundance) within affected habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species). The qualified entomologist shall also draft an Avoidance Plan with specific avoidance measures that will be implemented prior to and during Project activities. The Avoidance Plan shall be submitted to CDFW prior to Project activities for review. Upon CDFW approval of an Avoidance Plan, the qualified entomologist shall demarcate an appropriate buffer zone around all identified nest(s) ~~survey report must also include recommendations for avoidance, and the location information will be submitted to the California Natural Diversity Database (CNDDB) at the time of, or before, submittal of the survey report~~. ~~If the above measures are followed, it is assumed that the project need not to obtain authorization from CDFW through the California Endangered Species Act Incidental Take Permit process.~~ If complete avoidance	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		of Crotch's bumble bee is not feasible, the Project proponent shall continue consultation with CDFW to determine if take authorization from CDFW is required ~~the nest resources cannot be avoided during the nesting period, as outlined in this measure, the project applicant will consult with CDFW regarding the need to obtain an Incidental Take Permit~~. Any measures determined to be necessary through the Incidental Take Permit process to offset impacts to Crotch bumble bee may supersede measures provided in this CEQA document. In the event an Incidental Take Permit is needed, the Project proponent shall provide ~~mitigation for direct impacts to Crotch bumble bee will be fulfilled through~~ compensatory mitigation at a minimum 1:1 nesting habitat replacement of equal or better functions and values to those impacted by the project, or as otherwise determined through the Incidental Take Permit process. Mitigation ~~will~~ shall be accomplished ~~either~~ through off-site conservation and the Project proponent shall provide an endowment determined through the Incidental Take Permit process ~~or through a CDFW approved mitigation bank. If mitigation is not purchased through a mitigation bank, and lands are conserved separately, a cost estimate will be prepared to estimate the initial start up costs and ongoing annual costs of management activities for the management of the conservation easement area(s) in perpetuity. The funding source will be in the form of an endowment to help the qualified natural lands management entity that is ultimately selected to hold the conservation easement(s). The endowment amount will be established following the completion of a~~	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		~~project specific Property Analysis Record to calculate the costs of in perpetuity land management. The Property Analysis Record will take into account all management activities required in the Incidental Take Permit to fulfill the requirements of the conservation easement(s), which are currently in review and development~~. **MM-BIO-2. Least Bell's Vireo** Before starting construction, a qualified biologist must conduct eight focused surveys within suitable least Bell's vireo habitat between April 10 and July 31, and be spaced a minimum of 10 days apart, in accordance with the 2001 United State Fish and Wildlife Service (USFWS) Least Bell's Vireo Survey Guidelines. The eight focused protocol surveys must be completed, and the results of the surveys be submitted in a draft report to the City for review within 21 days of the completion of surveys. A final report must be prepared and submitted to the City and USFWS within 45 days following the completion of the surveys. If least Bell's vireo is determined to be absent, no further action is required. If least Bell's vireo is determined to be present based on the results of the protocol surveys, no construction may begin before consulting with California Department of Fish and Wildlife (CDFW) and USFWS for compliance with both the federal and State endangered species acts. Compensatory mitigation for impacts to 0.78 acre of marginally suitable least Bell's vireo habitat must be achieved in conjunction with Mitigation Measure BIO-4 for impacts to a jurisdictional drainage with mitigation ratio of at least 2:1.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		MM-BIO-3. Nesting Birds Before construction that would require removal of potential habitat for raptor and songbird nests between January 15 and September 1, the Project applicant must have a qualified biologist that is approved by the City conduct surveys for any and all active avian nests. Pre-construction nesting bird surveys must be conducted weekly, within 30 days before initiation of ground-disturbing activities to determine the presence of active nests. The surveys should~~??~~ continue on a weekly basis with the last survey being conducted not more than three days before the start of clearance/construction work. Surveys should include examination of trees, shrubs, and the ground, within grasslands, for nesting birds, as several bird species known to the area are shrub or ground nesters, including mourning doves. If ground-disturbing activities are delayed, additional preconstruction surveys may be recommended by the City so that not more than three days elapse between the survey and ground-disturbing activities. If active nests are located during pre-construction surveys, clearing and construction activities within 300 feet of the nest (500 feet for raptors) must be postponed or halted until the nest is vacated and juveniles have fledged, as determined by the biologist, and there is no evidence of a second attempt at nesting. Limits of construction to avoid an active nest must be established in the field with flagging, fencing, or other appropriate barriers and construction personnel should be instructed on the sensitivity of nest areas. The nest buffers may be reduced by the monitoring biologist when there is a biologist present to observe the nest for changes in behavior. The	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		biologist must serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur. It is recommended?? that the results of the survey, and any avoidance measures taken, be submitted to the City within 30 days of completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.	
BIO-2. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Potentially Significant	**MM-BIO-4. Sensitive Plant Communities** Before the Building Official issues a grading permit, impacts to sensitive plant communities (e.g., Fremont cottonwood/mulefat forest, Fremont cottonwood forest, and California sycamore woodland) must be mitigated through enhancement or restoration of remaining on-site sensitive plant communities at a ratio of 1:1 or the creation of new sensitive plant communities within the newly created channel area. A habitat mitigation and monitoring plan must be prepared by a City-approved biologist or restoration ecologist and approved by the City before the Public Works Director, or designee, issues a grading permit. The mitigation and monitoring plan must focus on the removal of nonnative elements within disturbed habitat areas of the project site or depict creation areas, planting/restoration methods and success criteria. In addition, this plan must provide details as to its implementation, maintenance, and future monitoring including the following components: ▪ Description of existing sensitive plant communities on the Project site;	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		▪ Summary of permanent impacts to the sensitive community based on approved Project design; ▪ Proposed mitigation location areas, with description of existing conditions prior to mitigation implementation; ▪ Detailed description of restoration or enhancement goals; ▪ Description of implementation schedule, site preparation, erosion control measures, planting plans, and plant materials; ▪ Provisions for mitigation site maintenance and control on non-native invasive plants; and ▪ Monitoring plan, including performance standards, adaptive management measures, and ▪ ~~m~~Monitoring reporting to the City of Santa Clarita Alternatively, mitigation for sensitive plant community impacts may be achieved through off-site restoration or enhancement at a ratio no less than 1:1 and may include the purchase of mitigation credits at an agency- approved off-site mitigation bank or an in-lieu fee program within Los Angeles County acceptable to the City.	
CUL-1. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	Potentially Significant	**MM-CUL-1. Retention of a Qualified Archaeologist** Before the Public Works Director, or designee, issues grading permit and before starting any ground-disturbing activity, the applicant must retain a qualified archaeologist, defined as one meeting the Secretary of the Interior's Professional Qualification Standards for archeology (U.S. Department of Interior 2012) to carry out all mitigation measures related to archeological resources. **MM-CUL-2. Cultural Resources Sensitivity Training**	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		Before starting ground-disturbing activities, the qualified archaeologist must conduct cultural resources sensitivity training for all construction personnel. Construction personnel will be informed of the types of archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. The applicant must ensure that construction personnel attend the training and retain documentation demonstrating attendance. **MM-CUL-3. Archaeological and Native American Monitoring.** An archaeological monitor (working under the direct supervision of the qualified archaeologist) and a Native American monitor must be present during all ground-disturbing activities within areas of the Project mapped as containing Holocene-age undifferentiated alluvium. The qualified archaeologist, in coordination with the City's Project Manager, may reduce or discontinue monitoring if it is determined that the possibility of encountering buried archaeological deposits is low based on observations of soil stratigraphy or other factors. Archaeological monitoring must be conducted by an archaeologist familiar with the types of archaeological resources that could be encountered within the Project area. The Native American monitor must be selected from the Native American groups identified by the Native American Heritage Commission (NAHC) as having affiliation with the Project area. The archaeological monitor and Native American monitor are empowered to halt or redirect ground-disturbing activities away from the vicinity of a discovery until the qualified archaeologist has evaluated the discovery	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		and determined appropriate treatment. The archaeological monitor must keep daily logs detailing the types of activities and soils observed, and any discoveries. After monitoring is completed, the qualified archaeologist must prepare a monitoring report that details the results of monitoring. The report must be submitted to the City and any Native American groups who request a copy. A copy of the final report must be filed at the SCCIC. MM-CUL-4. ~~Archaeological and Native American Monitoring~~ Inadvertent Discovery of Archaeological Resources Should unanticipated discovery of archaeological materials occur, the contractor must immediately cease all work activities in the area (within approximately 100 feet) of the discovery until it can be evaluated by a qualified archaeologist. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or tool-making debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone or concrete footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. Construction may not resume until the qualified archaeologist has conferred with the City's Project Manager on the significance of the resource. If it is determined by the qualified archaeological monitor that the discovered archaeological resource constitutes a historical resource or unique	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		archaeological resource under CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place maintains the important relationship between artifacts and their archaeological context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Data Recovery and Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with the City that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource. The qualified archaeologist and City's Project Manager must consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond those that are scientifically important, are considered.	
GEO-7: Would the project result in the movement or grading of earth exceeding 100,000 cubic yards?	Less than Significant	N/A	N/A
HAZ-7. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Potentially Significant	See **MM-~~CUL~~FIRE-1** through **MM-~~CUL~~FIRE-3** below.	Less than Significant
NOI-1. Would project construction occur outside of allowable hours or result in	Potentially Significant	**MM-NOI-1.**	Significant and Unavoidable

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
temporary noise levels above 90 dBA at existing vicinity residences?		Construction equipment within 200 feet of the northern and eastern boundary of the project site is limited to small, reduced noise equipment that has a maximum noise generation level of 77 dBA L_{eq} at 50 feet. This measure also applies to construction equipment during the later phases of construction for residential buildings within 200 feet of the Senior Living Building after it is occupied. **MM-NOI-2.** Construction noise barriers must be installed during project construction with sufficient height to block the line-of-sight between the project construction area and adjacent sensitive receivers, including proposed on-site residential uses that are completed and occupied while construction in other parts of the project site continues~~, are recommended during project construction~~.	(Cumulative)
FIRE-3. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Potentially Significant	**MM-FIRE-1. Extreme Fire Day Ignition Avoidance** All construction and maintenance activities must temporarily cease during Red Flag Warnings. The contractor's superintendent must coordinate with personnel to determine which low fire hazard activities may occur. Should the Fire Department declare a Red Flag Warning affecting the Wiley Canyon Project site, the same work activity restrictions occurring during National Weather Service Red Flag Warning periods apply. **MM-FIRE-2. Pre-Construction Requirements** Vegetation management must be conducted before the start of construction and throughout all construction phases. Perimeter fuel modification must be implemented and approved by the Fire Department	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		before bringing combustible materials on site. Existing flammable vegetation must be reduced by 50% on vacant lots upon commencement of construction. Caution must be used to avoid causing erosion or ground (including slope) instability or water runoff due to vegetation removal, vegetation management, maintenance, landscaping or irrigation. Before delivering lumber or combustible materials onto the site, site improvements within the active development area must be in place, including utilities, operable fire hydrants, an approved, temporary roadway surface, and fuel modification zones established. These features must be approved by the Fire Department before combustibles being brought on site. MM-FIRE-3. ~~Pre-Construction Requirements~~ LACFD FMZ Plant Selection Guideline Compliant The Fire Department publishes a list of plants that would not contribute to extreme fire behavior are suitable for Fuel Modification Zones. All plants included within fuel modification zones of the proposed project must be from this list and if a minimum distance from structures is stated for the species, such listed species may not be planted closer to any structures associated with the proposed project than the stated minimum distance. No plant that is not listed by the Fire Department on its Fuel Modification Zone Plant Selection Guidelines may be included within a Fuel Modification Zone of the proposed Project without approval by Fire Department.	

Section 1.8.1, Alternatives Evaluated, Page 1-36

This section discusses the alternatives to the project, including the No Project Alternative, under consideration. The No Project (No Development) Alternative, which is a required element of an EIR pursuant to Section 15126.6(e) of the CEQA Guidelines, examines the environmental effects that would occur if the project were not to proceed and no development activities were to occur. The other alternatives are discussed as part of the "reasonable range of alternatives" selected by the lead agency. The following alternatives are addressed in this section, followed by a more detailed discussion of each:

- Alternative 1 – No Project/No Build Alternative
- Alternative 2 – Affordable Housing Alternative
- Alternative 3 – Private Recreational Facility Alternative
- Alternative 4 – Construction Noise Setback Alternative
- Alternative 5 – Mixed Use Alternative

Alternative 1 – No Project/No Build Alternative

Under Alternative 1, development of the project site would not occur as discussed in Chapter 3 of this Draft EIR. ~~While no activity is currently occurring at the project site, it can be reasonably expected that the 75-acre portion of the project site north of Robinson Ranch Road could be re-landscaped and reopen as a golf course, as is currently allowed under existing conditions.~~ This alternative assumes the existing conditions at the time the notice of preparation was published (March 2022). Thus, the existing vacant condition as the former Smiser Mule Ranch would remain.

Alternative 5 – Mixed Use Alternative

Under Alternative 5, the project site would be developed with 232 townhome and/or detached condominium residential units and two-stories in height. In addition, this alternative would include a senior facility/assisted living facility of 140,000 square feet in size (120 assisted living units). The commercial component under this alternative would be 9,000 square feet. As shown in Figure 6-4, Alternative 5 Site Plan, the residential area would be 16.5 acres, and the assisted living/commercial area would be 3.5 acres. A total of 601 parking spaces would be provided for residential uses, 64 spaces for commercial use, and 66 spaces for senior living parking. The open space proposed on site would total 120,330 square feet, including 15,000 square feet for recreational amenities (e.g., pool, tot-lot, restroom), an 80,045-square-foot park, 16,850 square feet for the small lot single-family development private yards, and 8,435 square feet for townhome private yards. Under this alternative, the proposed grading activities, bank protection along Wiley Canyon Creek, and off-site infrastructure would all remain the same as the proposed project. As such, Alternative 5 would consist of the components shown in Table 1-2.

Section 1.8.1, Environmentally Superior Alternative, Pages 1-47 through 1-49

As indicated in Table 1-2, Alternative 1, the No Project Alternative, would result in the least environmental impacts, and therefore would be considered the Environmentally Superior Alternative. However, Section 15126.6(e)(2) of the CEQA Guidelines states that if the Environmentally Superior Alternative is the No Project Alternative, the EIR shall also identify an Environmentally Superior Alternative among the other alternatives.

Of the remaining alternatives previously evaluated, Alternative 4 would eliminate the significant and unavoidable impact related to construction noise. When comparing project objectives, Alternative 4 would meet all the project objectives with the exception of partially meeting Objective No. 1 given that no retail/commercial is proposed. Therefore, Alternative 4 is identified as the environmentally superior alternative given that it would meet all project objectives.

Table 1-2. Comparison of Project and Alternatives Impacts

Environmental Issue Area	Proposed Project	Alternative 1 No Project/ No Build	Alternative 2 Affordable Housing Alternative	Alternative 3 Private Recreational Facility Alternative	Alternative 4 Construction Noise Setback Alternative	Alternative 5 Mixed Use Alternative
Aesthetics	Less than Significant	▼	=	▲	=	=
Air Quality	Less than Significant with Mitigation	▼	=	▼	▼	▼
Biological Resources	Less than Significant with Mitigation	▼	=	=	=	=
Cultural Resources	Less than Significant	▼	=	=	=	=
Energy	Less than Significant	▼	=	▼	▼	▼
Geology and Soils	Less than Significant with Mitigation	▼	=	=	=	=
Greenhouse Gas Emissions	Less than Significant	▼	▲	▼	▼	▼
Hazards and Hazardous Materials	Less than Significant with Mitigation	▼	=	=	=	=
Hydrology and Water Quality	Less than Significant with Mitigation	▼	=	=	=	=
Land Use and Planning	Less than Significant with Mitigation	▼	=	=	=	=
Mineral Resources	Less than Significant	▼	=	=	=	=

Table 1-2. Comparison of Project and Alternatives Impacts

Environmental Issue Area	Proposed Project	Alternative 1 No Project/ No Build	Alternative 2 Affordable Housing Alternative	Alternative 3 Private Recreational Facility Alternative	Alternative 4 Construction Noise Setback Alternative	Alternative 5 Mixed Use Alternative
Noise	Significant and Unavoidable (construction and cumulative construction)	▼ (Eliminate)	=	=	▼ (Eliminate)	=
Population and Housing	Less than Significant	▼	▲	▼	▼	▼
Public Services	Less than Significant	▼	▲	▼	▼	▼
Recreation	Less than Significant with Mitigation	▼	▲	▼	▼	▼
Transportation	Less than Significant	▼	▲	▼	▼	▼
Tribal Cultural Resources	Less than Significant with Mitigation	▼	=	=	=	=
Utilities and Service Systems	Less than Significant	▼	▲	▼	▼	▼
Wildfire	Less than Significant with Mitigation	▼	=	=	=	=

Notes: = = Alternative is likely to result in similar impacts to issue when compared to project; ▼= Alternative is likely to result in reduced impacts to issue when compared to project; ▲= Alternative is likely to result in greater impacts to issue when compared to project.

Chapter 3, Project Description

Section 3.7, Project Approvals Required, Pages 3-13 and 3-14

The City is the lead agency for the proposed project pursuant to CEQA Guidelines Section 15367. The proposed project would require a number of permits and approvals by the City, including the following:

- **Tentative Map** to subdivide the project site into six lots
- **Grading Permit** for up to 44,000 cubic yards of cut and 59,000 cubic yards of fill, and the import of approximately 85,000 cubic yards of fill
- **Conditional Use Permit** for new development within the Planned Overlay District

- **Minor Use Permit** for commercial floor area ratio that does not meet the minimum required in the zone, and the import of approximately 85,000 cubic yards of fill
- **Development and Architectural Design Review** for the development of the proposed project
- **Oak Tree Permit** for removal of, encroachment upon, and/or impact to existing oak trees
- **Environmental Impact Report** certification as required by the California Environmental Quality Act
- **Clean Water Act Section 404 Permit** from the U.S. Army Corps of Engineers (USACE) (if jurisdictional aquatic resources are impacted)
- **Clean Water Act Section 401 Water Quality Certification** from the Los Angeles Regional Water Quality Control Board (RWQCB) (if jurisdictional aquatic resources are impacted)
- **Streambed Alteration Agreement** from the California Department of Fish and Wildlife (CDFW) pursuant to California Fish and Game Code Section 1602 (if jurisdictional aquatic resources are impacted)
- **Domestic Water Supply Permit Amendment** with the Santa Clarita Valley Water Agency from the State Water Resources Control Board, Division of Drinking Water
- **Encroachment Permit** from the California Department of Transportation
- **Transportation Permit** from the California Department of Transportation for the use of heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways

Section 4.2, Air Quality

Section 4.2.6, Mitigation Measures, Pages 4.2-40 and 4.2-41

The following mitigation measure (MM) is revised to address impacts from construction equipment.

MM-AQ-1. Construction Equipment Features. The project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 50 horsepower (hp) or greater during project construction ~~where available within the Los Angeles region~~. Such equipment shall be outfitted with Best Available Control Technology (BACT), which means a CARB-certified Level 3 diesel particulate filter (DPF) or equivalent.~~[COMPLYING WITH THE LAW IS NOT A MITIGATION MEASURE]~~

An exemption from this requirement may be granted by the City if (1) the City documents equipment with Tier 4 Final engines are not reasonably available, and (2) the required corresponding reductions in criteria air pollutant emissions can be achieved for the project from other combinations of construction equipment. Before an exemption may be granted, the City shall (1) demonstrate that at least three construction fleet owners/operators in Los Angeles region were contacted and that those owners/operators confirmed Tier 4 Final equipment could not be located within Los Angeles County during the desired construction schedule, and (2) the City shall provide evidence to Mitigation Monitoring Coordination (MMC) that the proposed replacement equipment has been evaluated using California Emissions Estimator Model (CalEEMod) or other industry standard emission estimation method, and documentation has been provided to confirm that necessary project-generated emissions reductions are achieved.

Section 4.3, Biological Resources

Section 4.3.5, Mitigation Measures, Pages 4.3-23 through 4.3-27

The following mitigation measures (MMs) must be implemented during and before project construction in order to reduce potential project-related impacts to biological resources to a less-than-significant level.

MM-BIO-1 Crotch Bumble Bee. ~~A pre-construction survey~~ Surveys for Crotch bumble bee shall ~~must~~ be conducted within one year of Project ground-disturbing activities ~~the construction footprint before starting of initial vegetation removal or initial grading activities occurring during the Crotch bumble bee nesting period (February 1 through October 31). The survey must confirm that no nests/hives for Crotch bumble bee are located within the construction area~~. ~~The pre-construction survey must~~ Surveys shall include 1) a habitat assessment and 2) focused surveys, both of which shall adhere to ~~will be based on recommendations described in~~ the "Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species," released by the California Department of Fish and Wildlife (CDFW) on June 6, 2023, or the most current at the time of construction.

The habitat assessment ~~must, at a minimum,~~ shall include historical and current species occurrences; document potential habitat onsite including foraging, nesting, and/or overwintering resources; and identify which plant species are present. ~~For the purposes of this mitigation measure, nest resources are defined as abandoned small mammal burrows, bunch grasses with a duff layer, thatch, hollow trees, brush piles, and man-made structures that may support bumble bee colonies such as rock walls, rubble, and furniture. If nesting resources are present in the impact area, focused surveys will be conducted.~~

~~The focused survey will~~ Focused surveys shall be performed by a qualified entomologist ~~biologist~~ with appropriate handling permits and familiarity with identification, behavior, and life history of the species. ~~expertise in surveying for bumble bees and include~~ Surveys shall include at least three survey passes that are not on sequential days or in the same week, preferably spaced two to four weeks apart. The timing of these surveys must coincide with the Colony Active Period (April 1 through August 31 for Crotch bumble bee). Surveys shall ~~may~~ occur between one hour after sunrise and two hours before sunset. Surveys shall ~~will~~ not be conducted during wet conditions (e.g., foggy, raining, or drizzling) ~~and surveyors will wait at least one hour following rain~~. Optimal surveys are when there are sunny to partly sunny skies that are greater than 60° Fahrenheit. ~~Surveys may be conducted earlier if other bees or butterflies are flying.~~ Surveys may not be conducted when it is windy (i.e., sustained winds greater than 8 mph). ~~Within non-developed habitats, the biologist must~~ The qualified entomologist shall look for nest/hive resources suitable for bumble bee use. Ensuring that all nest resources receive 100% visual coverage, the qualified entomologist ~~biologist~~ must watch the nest resources for up to five minutes, looking for exiting or entering worker bumble bees. Worker bees should arrive and exit an active nest site with frequency, such that their presence would be apparent after five minutes of observation. If a bumble bee worker is detected, then a representative individual must be identified to species to determine if it is Crotch bumble bee or one of the common, unregulated species. ~~Biologists should be able to view several burrows at one time to sufficiently determine if bees are entering/exiting them depending on their proximity to one another.~~ It is up to the discretion of the biologist regarding the actual survey viewshed limits from the chosen vantage point which would provide 100% visual coverage; this could include a 30- to

50-foot-wide area. If a nest is suspected, the surveyor can block the entrance of the possible nest with a sterile vial or jar until nest activity is confirmed (no longer than 30 minutes).

Identification shall include the qualified entomologist ~~will include trained biologists~~ netting/capturing the representative bumble bee in appropriate insect nets, per the protocol in U.S. National Protocol Framework for the Inventory and Monitoring of Bees. ~~The bee must be placed in a clear container for observation and photographic documentation if able. The bee will be photographed using a macro lens from various angles to ensure recordation of key identifying characteristics. If bumble bee identifying characteristics cannot be adequately captured in the container due to movement, the container will be placed in a cooler with ice until the bumble bee becomes inactive (generally within 15 minutes). Once inert, the bumble bee must be removed from the container and placed on a white sheet of paper or card for examination and photographic documentation. Based on implementation of this method on a variety of other bumble bee species, they become active shortly after removal from the cold environment, so photography must be performed quickly. The bumble bee must be released into the same area from which it was captured upon completion of identification.~~

If Crotch bumble bee nests are not detected, no further mitigation is required~~, and no additional surveys would be needed if construction begins within 14 days of the last survey for a given phase area~~. However, ~~If~~ if construction in a given phase area does not start within a year ~~14 days~~ of the last survey, surveys shall be repeated ~~or if construction in a given~~for that phase area stops. Additionally, if construction stops for 14 days or longer, surveys would be repeated if construction resumes in the nesting season ~~commences between February 1 and October 31.~~

~~The mere presence of foraging Crotch bumble bees would not require implementation of additional minimization measures because they can forage up to 10 kilometers from their nests. If nest resources occupied by Crotch bumble bee are detected within the construction area, no construction activities can occur within 100 feet of the nest, or as determined by a qualified biologist through evaluation of topographic features or distribution of floral resources. The nest resources will be avoided for the duration of the Crotch bumble bee nesting period (February 1 through October 31)~~. Outside of the nesting season, it is assumed that no live individuals would be present within the nest as the daughter queens (gynes) usually leave by September, and all other individuals ~~(original queen, workers, males) die. The gyne is highly mobile and can independently~~ disperse to outside of the construction footprint to surrounding open space areas ~~that support suitable hibernacula resources~~.

Following the habitat assessment and focused surveys, a ~~A~~ written survey report shall ~~will~~ be submitted to the City and CDFW prior to Project activities ~~within 30 days of the pre-construction survey~~. The report will include survey methods, weather conditions, a description and map of the survey area, and survey results, including a list of insect species observed and a figure showing the locations of any Crotch bumble bee nest sites or individuals observed. The survey report shall ~~will~~ include the qualifications/resumes of the ~~surveyor(s) and approved biologist~~ entomologist(s) for identification of photo vouchers, detailed habitat assessment, and photo vouchers. If Crotch bumble bee ~~nests~~ are observed, the qualified entomologist shall provide the location of all nests within and adjacent to the Project site. The survey report shall also include the physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. This shall include native plant composition (e.g., density, cover, and abundance) within

affected habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species). The qualified entomologist shall also draft an Avoidance Plan with specific avoidance measures that will be implemented prior to and during Project activities. The Avoidance Plan shall be submitted to CDFW prior to Project activities for review. Upon CDFW approval of an Avoidance Plan, the qualified entomologist shall demarcate an appropriate buffer zone around all identified nest(s) ~~survey report must also include recommendations for avoidance, and the location information will be submitted to the California Natural Diversity Database (CNDDB) at the time of, or before, submittal of the survey report~~.

~~If the above measures are followed, it is assumed that the project need not to obtain authorization from CDFW through the California Endangered Species Act Incidental Take Permit process.~~ If complete avoidance of Crotch's bumble bee is not feasible, the Project proponent shall continue consultation with CDFW to determine if take authorization from CDFW is required ~~the nest resources cannot be avoided during the nesting period, as outlined in this measure, the project applicant will consult with CDFW regarding the need to obtain an Incidental Take Permit~~. Any measures determined to be necessary through the Incidental Take Permit process to offset impacts to Crotch bumble bee may supersede measures provided in this CEQA document.

In the event an Incidental Take Permit is needed, the Project proponent shall provide ~~mitigation for direct impacts to Crotch bumble bee will be fulfilled through~~ compensatory mitigation at a minimum 1:1 nesting habitat replacement of equal or better functions and values to those impacted by the project, or as otherwise determined through the Incidental Take Permit process. Mitigation ~~will~~ shall be accomplished ~~either~~ through off-site conservation and the Project proponent shall provide an endowment determined through the Incidental Take Permit process ~~or through a CDFW approved mitigation bank. If mitigation is not purchased through a mitigation bank, and lands are conserved separately, a cost estimate will be prepared to estimate the initial start up costs and ongoing annual costs of management activities for the management of the conservation easement area(s) in perpetuity. The funding source will be in the form of an endowment to help the qualified natural lands management entity that is ultimately selected to hold the conservation easement(s). The endowment amount will be established following the completion of a project specific Property Analysis Record to calculate the costs of in perpetuity land management. The Property Analysis Record will take into account all management activities required in the Incidental Take Permit to fulfill the requirements of the conservation easement(s), which are currently in review and development~~.

MM-BIO-3 Nesting Birds. Before construction that would require removal of potential habitat for raptor and songbird nests between January 15 and September 1, the Project applicant must have a qualified biologist that is approved by the City conduct surveys for any and all active avian nests. Pre-construction nesting bird surveys must be conducted weekly, within 30 days before initiation of ground-disturbing activities to determine the presence of active nests. The surveys should~~??~~ continue on a weekly basis with the last survey being conducted not more than three days before the start of clearance/construction work. Surveys should include examination of trees, shrubs, and the ground, within grasslands, for nesting birds, as several bird species known to the area are shrub or ground nesters, including mourning doves. If ground-disturbing activities are delayed, additional preconstruction surveys may be recommended by the City so that not more than three days elapse between the survey and ground-disturbing activities.

If active nests are located during pre-construction surveys, clearing and construction activities within 300 feet of the nest (500 feet for raptors) must be postponed or halted until the nest is vacated and juveniles have fledged, as determined by the biologist, and there is no evidence of a second attempt at nesting. Limits of construction to avoid an active nest must be established in the field with flagging, fencing, or other appropriate barriers and construction personnel should be instructed on the sensitivity of nest areas. The nest buffers may be reduced by the monitoring biologist when there is a biologist present to observe the nest for changes in behavior. The biologist must serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur. The results of the survey, and any avoidance measures taken, shall be submitted to the City within 30 days of completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.

MM-BIO-4 Sensitive Plant Communities. Before the Building Official issues a grading permit, impacts to sensitive plant communities (e.g., Fremont cottonwood/mulefat forest, Fremont cottonwood forest, and California sycamore woodland) must be mitigated through enhancement or restoration of remaining on-site sensitive plant communities at a ratio of 1:1 or the creation of new sensitive plant communities within the newly created channel area. A habitat mitigation and monitoring plan must be prepared by a City-approved biologist or restoration ecologist and approved by the City before the Public Works Director, or designee, issues a grading permit. The mitigation and monitoring plan must focus on the removal of nonnative elements within disturbed habitat areas of the project site or depict creation areas, planting/restoration methods and success criteria. In addition, this plan must provide details as to its implementation, maintenance, and future monitoring including the following components:

- Description of existing sensitive plant communities on the Project site;
- Summary of permanent impacts to the sensitive community based on approved Project design;
- Proposed mitigation location areas, with description of existing conditions prior to mitigation implementation;
- Detailed description of restoration or enhancement goals;
- Description of implementation schedule, site preparation, erosion control measures, planting plans, and plant materials;
- Provisions for mitigation site maintenance and control on non-native invasive plants; and
- Monitoring plan, including performance standards, adaptive management measures, and
- ~~m~~Monitoring reporting to the City of Santa Clarita

Alternatively, mitigation for sensitive plant community impacts may be achieved through off-site restoration or enhancement at a ratio no less than 1:1 and may include the purchase of mitigation credits at an agency- approved off-site mitigation bank or an in lieu fee program within Los Angeles County acceptable to the City.

Section 4.8, Hazards and Hazardous Materials

Pages 4.8-1

This section describes the existing hazardous materials within the vicinity of the proposed Wiley Canyon Project (project) site, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project. The analysis contained herein is based on the findings of the following technical documents:

- Phase I Environmental Site Assessment Report, Wiley Canyon Development, 24924 Hawkbryn Avenue, Santa Clarita, California 91321, prepared by EFI Global, February 28, 2022 (Appendix H-1)
- Phase I Environmental Site Assessment, Smiser Mule Ranch at 24924 Hawkbryn Avenue, Santa Clarita, Los Angeles County, CA 91321, prepared by Gabriel Environmental Services, August 11, 2004 (Appendix H-2a through H-2d)
- Phase II Environmental Site Assessment, 24924 Hawkbryn Avenue, Santa Clarita, California 91321, prepared by EFI Global, April 2, 2025 (Appendix H-3).

Section 4.8.1, Environmental Setting, Pages 4.8-1 through 4.8-3

The existing conditions presented in this section are based on review of ~~a Phase I Environmental Site Assessment (ESA) prepared for the project site in August 2004~~ The Phase I Environmental Site Assessments (ESAs) prepared in 2004 and 2022, and supplemented with a current review of environmental databases. The Phase I ESAs ~~is~~ are included as Appendix H of this EIR. The Phase I ESAs included a search of available environmental records conducted by Environmental Data Resources Incorporated~~,~~. ~~h~~However because of the age of ~~this~~ these reports, a review of current databases was performed us~~ed~~ing available resources from the ~~Los Angeles Regional~~ State Water ~~Quality~~Resources Control Board (~~RWQ~~SWRCB), the Department of Toxic Substances Control (DTSC), and the United States Environmental Protection Agency (EPA). The database search in the Phase I ESAs identified facilities within a 1-mile radius of the project site that are known to have environmental concerns or are listed as facilities with permits to generate, handle, store, or dispose of hazardous materials. The Phase I ESAs also included a review of historical aerial photographs which has ~~also~~ been updated through reviewing more recent historical aerial photographs ~~since 2004 to the present~~ for any evidence of land use changes since preparation of the ~~2004~~ Phase I ESAs.

Site Description and History

The following information was obtained from the 2004 Phase I ESA and 2022 Phase I ESA (Appendices H-1 and H-2a through H-2d). The 31.8-acre project site is irregularly shaped and relatively level at an elevation of approximately 1,294 feet above mean sea level with a gentle slope towards the northeast. The project site is predominately undeveloped with past land uses that have mostly included agricultural (i.e., mule ranch and pasture land). The 2022 Phase I ESA identified this past agricultural use as a potential Recognized Environmental Condition (REC). In response to this REC, a Phase II ESA was conducted in April 2025 across the entire project site proposed for residential development (Appendix H-3). This Phase II ESA included composite sampling and analysis of surface-level soils (top 6 inches) for pesticide-related contamination. Sampling was completed following Department of Toxic Substances Control (DTSC) Interim Guidance for Sampling Agricultural Properties. Two samples contained

detectable concentrations of 4,4-DDE (0.0015 milligrams per kilogram (mg/kg) and 0.00097 mg/kg), which are both orders of magnitude below the applicable DTSC Screening Level of 2 mg/kg for residential soil. Arsenic was identified in all composite soil samples at concentrations ranging from 2.3 mg/kg to 4.3 mg/kg, all of which were one order of magnitude below the DTSC-established background concentration of 12 mg/kg. As such, the Phase II ESA concluded that "a significant risk to human health or the environment due to the former agricultural and/or ranching use of the [project site] has not been identified."

Improvements include two primary structures on the northern end of the site that were constructed in 1978 and 1980 ~~(Gabriel 2004)~~. The two structures are constructed of metal and have in the past been used as shops for construction of wooden furniture and cabinets and before that, as barns for the ranch ~~(Gabriel 2004)~~. Both Phase I ESAs concluded that, based on the age of the structures, asbestos and lead-based paints could be present.

According to a review of historical aerial photographs there was an improvement shown in a 1952 photograph that appeared to be a pit/sump related to gas/oil well exploration ~~(Gabriel 2004)~~. However, a review of records did not indicate any permits or record of such activity at the project site. The 2022 Phase I ESA identified the feature in the 1952 aerial photograph as an "unlined water reservoir." The closest wells to the site were found to be approximately 400 feet east of the site across Wiley Canyon Road and 500 feet north of the project site ~~(Gabriel 2004)~~. A current review of the California Geologic Energy Management Division (CalGEM) Well Finder database identified two oil and gas fields adjoining the project site, Lyon Canyon to the west/northwest and Newhall to the east/southeast. Lyon Canyon is an abandoned field with four plugged wells and one plugged dry hole. Newhall is larger than Lyon Canyon, and still contains active oil and gas wells. These active wells are all at least 2 miles west, south, and southeast from the project site.

Site Groundwater

According to the findings of the geotechnical investigation that was prepared for the project site, no natural seeps, or springs or indicators of near surface ground water were observed during the field investigation conducted in 2021 (Appendix E). An inactive ground water well on the site was identified according to the County of Los Angeles Department of Public Works (Appendix E). This water well had groundwater levels as high as 80 feet below the ground surface. During a 2007 geotechnical investigation, groundwater was reportedly encountered in 6 different borings ranging from about 58 to 66 feet below the ground surface within the central and northerly portions of the site. Shallower groundwater was encountered on other portions of the site ranging from 35 to 42 feet below the ground surface. Based on the historically highest ground water contours included in the Seismic Hazard Zone Report for the Oat Mountain 7.5-Minute Quadrangle, the interpolated historic high ground water elevation considered for the geotechnical investigation was approximately 30 feet beneath the existing ground surface (Appendix E).

Based on a review of the National Pipeline Mapping System Public Viewer there are no gas transmission pipelines or hazardous liquid pipelines mapped within the immediate vicinity of the project site (DOT 2022).

~~The Phase I ESA notes that based on the age of the current on site structures, there is a potential for asbestos containing materials or lead based paint to occur at the site (Gabriel 2004).~~

Database Search and Agency Files

A database search was included in both ~~the 2004~~ Phase I ESAs, and did not discover any known hazardous materials use at the site or documented releases (~~Gabriel 2004~~Appendix H). A more current review of available databases was conducted for the purposes of this document and included a review of the ~~United States~~

~~Environmental Protection Agency~~ EPA National Priorities List (NPL also referred to as Superfund Sites), ~~State Water Resources Control Board (SWRCB and also known as Water Board)~~ SWRCB Geotracker database, the DTSC Envirostor database, Los Angeles County Public Works, and other databases included on the California Environmental Protection Agency's Cortese List Resources website.

According to the NPL database records, the project site is not included as a Superfund site (EPA 2022).

The Geotracker database which includes leaking underground storage tanks, cleanup program sites and military evaluations did not show the project site as a site with a known release or involved in cleanup activities (SWRCB 2022). The nearest site to the project site is the Busy Bee Cleaners located at 25235 Wiley Canyon Road, approximately a half-mile north of the northern boundary of the site and is listed on the cleanup program database. However, the current status of the case shows that it is eligible for closure (SWRCB 2022). This site is also in the presumable downgradient direction from the project site based on topography.

~~The Water Board~~ SWRCB also maintains a list of solid waste disposal sites where waste constituents are above hazardous waste levels outside the waste management unit. The project site was not included in this database (Cal EPA 2022a). In addition, the project site was not included in the list of Cease and Desist Orders or Cleanup and Abatement Orders from the Water Board (Cal EPA 2022b).

Section 4.8.2, Regulatory Framework, Pages 4.8-5

Universal Waste

Title 40 USC, Chapter 1, Subchapter I, Part 273 governs the collection and management of widely generated waste, including batteries, pesticides, mercury-containing equipment, and lightbulbs. This regulation streamlines the hazardous waste management standards and ensures that such waste is diverted to the appropriate treatment or recycling facility.

National Emission Standard for Asbestos

Title 40 USC, Chapter 1, Subchapter C, Part 61 – National Emission Standards for Hazardous Air Pollutants, Subpart M, established National Emission Standards for Hazardous Air Pollutants (NESHAP) and names ACM as one of these materials. ACM is defined as materials containing more than 1 percent asbestos. ACM use, removal, and disposal are regulated by the U.S. Environmental Protection Agency (EPA) under this law. In addition, notification of friable ACM (ACM that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure) removal prior to a proposed demolition project is required by this law.

Section 4.8.2, Regulatory Framework, Pages 4.8-7

Asbestos and Air Quality

Enforcement of the NESHAP Regulation, California HSC Section 39658(b)(1)

The California Air Resources Board is responsible for overseeing compliance with the federal Asbestos NESHAPs in Los Angeles County. The Asbestos NESHAP Program enforces compliance with the federal NESHAPs regulation for asbestos and investigates all related complaints, as specified by California HSC Section 39658(b)(1). Of the 35 air districts in California, 16 do not have an asbestos program in place. In these "non-delegated" districts, a demolition/

renovation notification is required for compliance with the Asbestos NESHAP. (This notification is not equivalent to a permit.) The California Air Resources Board reviews and investigates the notifications. The Asbestos NESHAP Program also administers two annual statewide asbestos NESHAP task force meetings for air districts and EPA to facilitate communication and enforcement continuity, and it assists EPA in training district staff to enforce the Asbestos NESHAP.

Contractors State License Board

The California Department of Consumer Affairs Contractors State License Board manages the licensing of asbestos abatement contractors.

Lead-Based Paint

The California Department of Public Health enforces lead laws and regulations related to the prevention of lead poisoning in children, prevention of lead poisoning in occupational workers, accreditation and training for construction-related activities, lead exposure screening and reporting, disclosures, and limitations on the amount of lead found in products. Accredited lead specialists are required to find and abate lead hazards in a construction project and to perform lead-related construction work in an effective and safe manner. The specific regulations are described in the following subsections.

California HSC Section 105250 establishes a program to accredit lead-related construction training providers and certify individuals to conduct lead-related construction activities. California Labor Code Sections 6716–6717 establishes standards that protect the health and safety of employees who engage in lead-related construction work, including construction, demolition, renovation, and repair.

Local

South Coast Air Quality Management District

Rule 403 – Fugitive Dust. The South Coast Air Quality Management District (SCAQMD) requires compliance with Rule 403 to reduce the amount of particulate matter in ambient air resulting from man-made fugitive dust sources. These compulsory steps include monitoring and dust-reducing actions during activities that can generate dust, such as construction and earthwork.

Rule 1403 – Asbestos-Containing Materials. SCAQMD requires compliance with Rule 1403 for protection from ACM. These compulsory steps include surveys, notification, and proper abatement of ACM prior to renovation or any demolition.

Section 4.8.4, Impact Analysis, Pages 4.8-10

The analysis of the potential hazardous materials impacts is based on information from the 2004 Phase I ESA, 2022 Phase I ESA, and 2024 Phase II ESA (Appendix H) as well as an updated review of environmental databases, which is used to establish existing conditions and to identify potential environmental effects, based on the standards of significance presented in this section. Potential public safety hazards (related to airports, emergency response plans, and wildland fires) are based on the information presented in the subsections below. In determining the level of significance, the analysis assumes that the proposed project would comply with all applicable state and local ordinances and regulations (summarized in Section 4.8.2, Regulatory Framework).

Section 4.8.4, Impact Analysis, Pages 4.8-11

Construction activities would also include demolition of the existing structures at the north end of the site. Given the age of these structures, and consistent with the findings reported in the Phase I ESAs, the presence of hazardous building materials containing asbestos or lead-based paint (LBP) are possible. Additionally, hazardous building materials such as mercury and polychlorinated biphenyls (PCBs) may also be present in building equipment, such as electrical components, thermostats, and caulking. A hazardous material building survey would be required by a licensed contractor to verify hazardous building materials have been identified and will be properly abated before a demolition permit is issued by the City. The handling, removal, and disposal of hazardous building materials and universal wastes is regulated on a federal, state, and local level. Asbestos-containing materials would be stored, handled, transported, and disposed of in accordance with the provisions established in SCAQMD Rule 1403, Cal/OSHA Asbestos and Carcinogen Unit, California Department of Public Health, CalRecycle, and NESHAP. Lead-based paint abatement or removal would be controlled and regulated by California Department of Public Health, CalRecycle, and EPA's Lead Renovation, Repair, and Painting Rule. Universal wastes are regulated by DTSC's Universal Waste Rules, CalRecycle, and EPA's Solid Waste Rules. ~~However, before the Building Official issues a demolition permit, a hazardous building materials survey would be required by a licensed contractor. The identification, removal, and disposal of asbestos containing materials (ACMs) is regulated under Title 8 of the California Code of Regulations Sections 1529 and 5208. The identification, removal and disposal of LBP is regulated under 8 CCR section 1532.1. For both ACM and LBP, all work must be conducted by a State certified professional. If ACM and/or LBP is determined to exist onsite, a site specific hazard control plan must be prepared and submitted to the appropriate agency detailing removal methods and specific instructions for providing protective clothing and equipment for abatement personnel (South Coast Air Management District for asbestos and Cal/OSHA for lead). If necessary, a State certified LBP and an asbestos removal contractor would be retained to conduct the appropriate abatement measures as required by the plan.~~ Wastes from abatement and demolition activities would be disposed of at a landfill(s) authorized~~licensed~~ to accept such waste. Once all abatement measures have been implemented, the contractor would conduct a clearance examination and provide written documentation to the City that testing and abatement have been completed in accordance with all federal, state, and local laws and regulations.

Section 4.8.4, Impact Analysis, Pages 4.8-13

Government Code Section 65962.5 combines several regulatory lists of sites that have the potential to pose a hazard related to known hazardous materials or substances. DTSC's EnviroStor database identifies sites that have known contamination or sites for which there may be reasons to investigate further. As discussed in Section 4.8.1, Existing Conditions, a search of selected government databases was conducted as part of the 2004 and 2022 Phase I ESAs (Appendix ~~X~~H-1 and H-2a through H-2d) ~~which~~and was updated by a current search of the available databases (SWRCB 2022; DTSC 2022; Cal EPA 2022a; Cal EPA 2022b); County of Los Angeles Public Works 2022; and EPA 2022). ~~Therefore, t~~The project site itself is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The project site was also not included on any of these databases and no cases within close proximity to the site was identified.

Section 4.10, Land Use and Planning

Section 4.10.4, Impact Analysis, Pages 4.10-34

Table 4.10-2. General Plan Land Use Consistency Analysis

Goals, Objectives, and Policies	Discussion
Policy LU 5.2.2: Provide for location of neighborhood commercial uses in proximity to the neighborhoods they serve, to encourage cycling and walking to local stores.	~~Consistent~~ Not Applicable. The proposed project would include 8,914 square feet of commercial space in close proximity to 379 new multifamily residential units and a senior care facility. The project would also include the development of 1.3 miles of pedestrian and bike trails throughout the project site and surrounding area. However, the commercial use is not proposed to be neighborhood-serving. As such, the proposed project would not conflict with the City's implementation of this policy.

Section 4.12, Noise

Section 4.12.5, Mitigation Measures, Pages 4.12-21

MM-NOI-2 Construction noise barriers must be installed during project construction with sufficient height to block the line-of-sight between the project construction area and adjacent sensitive receivers, including proposed on-site residential uses that are completed and occupied while construction in other parts of the project site continues~~, are recommended during project construction~~.

Chapter 5, Alternatives

Section 6.4, Alternatives Under Consideration, Page 6-3

This section discusses the alternatives to the project, including the No Project Alternative, under consideration. The No Project/No Build Alternative, which is a required element of an EIR pursuant to CEQA Guidelines section 15126.6(e), examines the environmental effects that would occur if the project were not to proceed and no development activities were to occur. The other alternatives are discussed as part of the "reasonable range of alternatives" selected by the lead agency. The following alternatives are addressed in this section, followed by a more detailed discussion of each:

- **Alternative 1** – No Project/No Build Alternative
- **Alternative 2** – Affordable Housing Alternative
- **Alternative 3** – Private Recreational Facility Alternative
- **Alternative 4** – Construction Noise Setback Alternative
- **Alternative 5** – Mixed Use Alternative

Section 6.4.5, Alternative 5 – Mixed Use Alternative, Page 6-36

The applicant, in cooperation with City staff, has developed a revised alternative (Alternative 5, Mixed Use Alternative) that addresses numerous concerns raised by the surrounding community. This new alternative removes the for-rent residential component of the proposed project (379 units and up to four stories) and replaces it with 232 townhome and/or detached condominium residential units. The townhome/condominium units would be two-story in height. Under Alternative 5, the size of the senior facility/assisted living facility would reduce to 140,000 square feet (120 assisted living units) when compared to the proposed project. The commercial component under this alternative would remain at 9,000 square feet. As shown in Figure 6-4, Alternative 5 Site Plan, the residential area would be 16.5 acres, and the assisted living/commercial area would be 3.5 acres. A total of 601 parking spaces would be provided for residential uses, 64 spaces for commercial use, and 66 spaces for senior living parking. The open space proposed on site would total 120,330 square feet, including 15,000 square feet for recreational amenities (e.g., pool, tot-lot, restroom), an 80,045-square-foot park, 16,850 square feet for the small lot single-family development private yards, and 8,435 square feet for townhome private yards. Under this alternative, the proposed grading activities, bank protection along Wiley Canyon Creek, and off-site infrastructure would all remain the same as the proposed project.

Section 6.4.5.1, Environmental Impact Analysis

Aesthetics

As discussed in Section 4.1, Aesthetics, of this EIR, implementation of the proposed project would result in less-than-significant scenic vista, scenic resources, visual character, and nighttime light and glare impacts. No mitigation measures are required.

Under Alternative 5, townhome/condominium and senior living land uses are proposed on the project site, which would provide similar land uses to the proposed project. As shown in Figure 6-4, Alternative 5 Site Plan, the proposed residential buildings would be 2-stories in height. Publicly accessible views from Wiley Canyon Road would be limited from the proposed berm and the 200-foot landscaped setback to the north of the site. Impacts related to scenic vistas and scenic resources within a state scenic highway would be the same as the proposed project. Moreover, the proposed land uses are permitted on the project site and subject to the same regulations governing scenic quality, lighting and glare as the proposed project. Therefore, impacts related to aesthetics under Alternative 4 would be **similar to** the proposed project.

Air Quality

As discussed in Section 4.2, Air Quality, of the Draft EIR, implementation of the proposed project would not result in conflicts with an adopted air quality management plan, would not exceed established thresholds for criteria air pollutants during construction or operation, and, with implementation of mitigation (MM-AQ-1), would not expose sensitive receptors to pollutant concentrations during construction. All air quality impacts can be mitigated to a less-than-significant level.

Under Alternative 5, construction and operational activities are anticipated to be similar to the proposed project. The proposed land uses on site under this alternative are allowed under the City's General Plan and zoning designation. As such, implementation of Alternative 5 would not result in a conflict with the AQMP. Construction of Alternative 5 would require similar equipment and activities as the proposed project. Given this, it is anticipated mitigation would be required to reduce mobile source emissions, such as NO_X, which are generated from the use

of construction equipment such as dozers and loaders. Similar to the proposed project, MM-AQ-1 would be required to reduce impacts to less-than-significant levels. Additionally, with similar construction activities, Alternative 5 is anticipated to require mitigation (i.e., MM-AQ-1) to reduce construction-related toxic air contaminants to less-than-significant levels. However, the scale of the proposed development under this alternative is less in comparison to the proposed project. Therefore, air quality impacts under Alternative 4 would be **less than** the proposed project.

Biological Resources

As discussed in Section 4.3, Biological Resources, of the Draft EIR, with implementation of mitigation measures MM-BIO-1 through MM-BIO-3, impacts to special-status wildlife species (e.g., least Bell's vireo, Cooper's hawk) would be less than significant. Similarly, with implementation of mitigation measure MM-BIO-4, impacts to riparian and sensitive plant communities to less than significant. MM-BIO-5 would reduce impacts to protected waters to less than significant.

Under Alternative 5, the senior facility/assisted living facility would reduce from 277,108 (61 assisted living units, 130 independent units, 26 memory care units) square feet under the proposed project to 140,000 square feet (120 assisted living units). However, the potential impacts associated with the South Fork of the Santa Clara River (i.e., Wiley Canyon Creek) would remain under this alternative and Alternative 5 would include the same bank protection as under the proposed project. Therefore, all impacts related to biological resources under the proposed project would occur under Alternative 5 and mitigation measures MM-BIO-1 through MM-BIO-5 would be necessary to reduce impacts to less-than-significant levels. Therefore, impacts to biological resources under Alternative 4 would be **similar to** the proposed project.

Cultural and Tribal Cultural Resources

As discussed in Section 4.4, Cultural Resources, of the Draft EIR, impacts to historical resources and archaeological resources would be less than significant with the implementation of mitigation measures MM-CUL-1, MM-CUL-2, MM-CUL-3, and MM-CUL-4. Similarly, impacts to human remains would be less than significant with mitigation measure MM-CUL-5 incorporated.

As discussed in Section 4.17, Tribal Cultural Resources, of this EIR, impacts to tribal cultural resources would be less than significant with implementation of mitigation.

Under Alternative 5, a reduced development footprint is proposed when compared to the proposed project. However, as detailed in Section 4.4 of the Draft EIR, there is potential for unknown cultural resources to be encountered during project implementation on the project site. As such, all impacts related to cultural resources under the proposed project would occur under this alternative. Mitigation measures MM-CUL-1 through MM-CUL-5 would be necessary to reduce impacts to less-than-significant levels. Therefore, impacts to cultural resources under Alternative 5 would be **similar to** the proposed project.

Energy

As discussed in Section 4.5, Energy, of the Draft EIR, energy impacts associated with the proposed project would be less than significant, and no mitigation is required.

Under Alternative 5, it is anticipated that the proposed building footprint would result in slightly less energy use during construction and operation when compared to the proposed project. Similar to the proposed project, this

alternative would be required to comply with applicable regulations governing energy efficiency. As such, it is anticipated Alternative 5 would result in a less than significant impact regarding wasteful, inefficient, or unnecessary consumption of energy resources. Additionally, Alternative 5 would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and would result in a less than significant impact, consistent with the Project. Therefore, energy-related impacts under Alternative 5 would be **less than** the proposed project.

Geology and Soils

As discussed in Section 4.6, Geology and Soils, of the Draft EIR, impacts related to geology and soils were found to be less than significant without mitigation. However, given that there are fossil localities nearby the project site from the same sedimentary deposits that occur on site, mitigation (MM-GEO-1 through MM-GEO-4) was required to reduce impacts to paleontological resources to less-than-significant levels.

Under Alternative 5, a reduced development footprint is proposed when compared to the proposed project. Compliance building code regulations would reduce impacts related to geology and soils, consistent with the proposed project. However, given the project site's sensitivity for fossil localities nearby, MM-GEO-1 through MM-GEO-4 would be required under Alternative 5 to reduce impacts to less than significant. Therefore, it is likely that impacts related to geology and soils under Alternative 5 would be **the same as** the proposed project.

Greenhouse Gas Emissions

As discussed in Section 4.7, Greenhouse Gas Emissions, of the Draft EIR, all GHG emission impacts would be less than significant, and no mitigation is required.

Under Alternative 4, the construction scenario would be slightly less than to the proposed project and generate less construction-related GHG emissions. During operations, a reduction in vehicle trips (see Attachment 4) is anticipated as a result of Alternative 5. Given this, GHG impacts under Alternative 5 are anticipated to be **less than** the proposed project.

Hazards and Hazardous Materials

As discussed in Section 4.8, Hazards and Hazardous Materials, of the Draft EIR, potential impacts associated with hazards and hazardous materials would be less than significant. However, there is the potential for impacts associated with the potential exposure of people or structures to risk of loss, injury, or death involving wildland fires. With implementation of mitigation measures MM-FIRE-1 through MM-FIRE-3, impacts would be reduced to less-than-significant levels.

Under Alternative 5, a reduced development footprint is proposed when compared to the proposed project. Impacts related to hazards and hazardous materials are anticipated to be the same as the proposed project. Additionally, mitigation measures MM-FIRE-1 through MM-FIRE-3 would be required under this alternative to reduce site-specific impacts associated with the potential exposure of people or structures to risk of loss, injury, or death involving wildland fires. Given this, impacts related to hazards and hazardous materials under Alternative 5 would be **the same as** the proposed project.

Hydrology and Water Quality

As discussed in Section 4.9, Hydrology and Water Quality, of the Draft EIR, impacts related hydrology and water quality would be less than significant. However, impacts related to the project's potential to impede or redirect flood

flows would be less than significant with the incorporation of MM-HYD-1. Similarly, impacts related to flood hazards would require implementation of MM-HYD-1 to reduce to less-than-significant levels.

Under Alternative 5, a reduced development footprint is proposed when compared to the proposed project. The alternative would require the same on- and off-site improvements to the South Fork of the Santa Clara River (i.e., bank protection along Wiley Canyon Creek and a drainage basin adjacent to the river). As such, impacts related to flood hazards would require implementation of MM-HYD-1 to reduce to less-than-significant levels under Alternative 5. Given this, impacts related to hydrology and water quality under Alternative 5 would be **the same as** the proposed project.

Land Use and Planning

As discussed in Section 4.10, Land Use and Planning, of the Draft EIR, land use and planning impacts would be potentially significant associated with the impacts outlined throughout this EIR (i.e., MM-AQ-1, MM-BIO-1 through MM-BIO-5, MM-HYD-1, MM-NOI-1 and MM-NOI-2, and MM-FIRE-1 through MM-FIRE-3). As such, in order to ensure consistency between the proposed project and applicable land use plans, policies, and regulations that have been adopted for the purpose of avoiding or mitigating an environmental effect to the maximum extent feasible, mitigation measures have been incorporated to reduce impacts to less-than-significant levels.

Under Alternative 5, the land uses proposed on site are allowed under the City's General Plan and zoning designation. Therefore, similar to the proposed project, mitigation measures identified throughout the Draft EIR would be incorporated to reduce impacts to less-than-significant levels. Given this, impacts related to land use and planning under Alternative 5 would be **the same as** the proposed project.

Mineral Resources

As discussed in Section 4.11, Mineral Resources, of the Draft EIR, impacts would be less than significant due to the lack of any known significant mineral resources.

Under Alternative 5, a reduced development footprint is proposed when compared to the proposed project. Mineral extraction activities do not occur on site under existing conditions. As such, Alternative 5 would not result in the loss of availability of a known mineral resource. Site-specific impacts to mineral resources under Alternative 5 would be **the same as** the proposed project.

Noise

As discussed in Section 4.12, Noise, of the Draft EIR, construction noise and construction vibration would result in significant impacts that cannot be mitigated to a less-than-significant level. However, these impacts would be short-term and limited to construction activities. The project would result in significant and unavoidable impacts related to construction noise even with the incorporation of mitigation measures MM-NOI-1 and MM-NOI-2. Similarly, the project would result in cumulatively considerable construction noise impacts. In particular, a significant impact would occur as a result of a temporary exceedance in the ambient noise thresholds during construction, as well as an exceedance in significance thresholds related to the proposed Senior Living residences on site. Operational noise and vibration impacts associated specifically with the project would be less than significant and would not require mitigation.

Under Alternative 5, a reduced development footprint is proposed when compared to the proposed project. Moreover, as shown in Figure 6-4, this alternative includes a setback for a surface parking lot in between the

existing mobile home park to the north and the project's proposed senior facility/assisted living facility. Despite this, it is anticipated that construction-related impacts would remain significant and unavoidable even with MM-NOI-1 and MM-NOI-2 incorporated. Similar to the proposed project, significant noise-related impacts would occur due to the phasing of the construction activities and proximity of the proposed senior facility/assisted living facility on site. For these reasons, impacts related to noise and vibration would be **similar to** the proposed project and significant and unavoidable impacts would remain under Alternative 5.

Population and Housing

As discussed in Section 4.13, Population and Housing, impacts related to population and housing would be less than significant, and no mitigation is required. The proposed project does not include the displacement of any people, housing, or businesses, nor would the proposed development induce population growth. Construction employment at the project site is not anticipated to generate population growth in the City. During operation, total employment is estimated to be filled by City residents or by residents of neighboring cities or communities.

Under Alternative 5, 232 townhome and/or detached condominium residential units are proposed on the project site. Utilizing the City's average persons per household of 3.08 (as identified in Section 4.13 of the Draft EIR), this alternative is anticipated to result in approximately 715 residents.[9,10] Accordingly, the population projections under Alternative 5 would be less than the 1,371 residents anticipated under the proposed project. The alternative would result in a reduced housing and population growth when compared to the proposed project. Moreover, the additional units and associated residents would result in a nominal contribution to the City and Santa Clarita Valley's projected population of 485,000 by 2030. Less than significant impacts are anticipated under Alternative 5. Therefore, impacts related to population and housing would be **less than** the proposed project.

Public Services

As discussed in Section 4.14, Public Services, of the Draft EIR, impacts related to police, fire, schools, parks, and other public services (libraries) would be less than significant, and no mitigation is required.

Under Alternative 5, less population growth is anticipated when compared to the proposed project (see the discussion above regarding population and housing). Given this, the alternative is anticipated to generate less demand for police, fire, schools, parks, and other public services (libraries) when compared to the proposed project. In addition, this alternative would result in a nominal contribution to population projections, and impacts are anticipated to remain less than significant. Therefore, impacts under Alternative 5 would be **less than** the proposed project.

Recreation

As discussed in Section 4.15, Recreation, of the Draft EIR, impacts related to recreation would be less than significant with implementation of all mitigation measures required for all other environmental issue areas. The proposed project includes recreational components, which would result in construction and operational impacts.

9 232 x 3.08 = 714.56 or 715 (rounded to the nearest whole person)

10 Similar to Section 4.13, Population and Housing, for the purposes of this analysis, the living spaces associated with the senior care facility are not considered new housing units because they are components of the senior care facility and are not accessible to all members of the public.

The construction noise impacts would be temporary in nature and attributed to the entire project, not just the recreational component.

Under Alternative 5, recreational amenities are proposed, similar to the proposed project. Given this and the anticipated reduction in population under this alternative, an increase in the use of existing neighborhood and regional parks or other recreational facilities would likely be reduced in comparison to the proposed project. Therefore, impacts as a result of Alternative 5 would be **less than** the proposed project.

Transportation

As discussed in Section 4.16, Transportation, of the Draft EIR, the proposed project would generate approximately 3,696 ADT, with 210 trips occurring during the AM peak hour and 307 trips occurring during the PM peak hour before accounting for the internal capture of trips between uses and existing trips currently passing by the project site. The vehicle miles traveled (VMT) analysis demonstrated that the proposed project's VMT per resident and VMT per employee are below the threshold, and would result in a less than significant impacts. Moreover, no hazardous geometric design features would be part of the project's roadway improvements and the project would not result in inadequate emergency access. Therefore, impacts would be less than significant.

Under Alternative 5, similar less-than-significant impacts would occur relative to geometric design features and emergency access. The proposed design under this alternative is similar to the proposed project, in which the same off-site street improvements are proposed as the proposed project. Table 6-9 compares the trip generation of the proposed project with Alternative 5. As shown, Alternative 5 is expected to generate approximately 2,985 average daily trips; whereas, the proposed project would generate approximately 3,696 average daily trips (Attachment 4). As such, 711 fewer daily trips would occur under this alternative when compared to the proposed project. Given this, the impacts associated with Alternative 5 are anticipated to be **less than** the proposed project.

Table 6-9. Alternative 5 vs. Proposed Project Trip Generation Comparison

Land Use	Amount	Units	Average Daily Trips
Proposed Project			
		Total Trip Generation	**3,696**
Alternative 5			
Single-Family Attached Housing	205	DU	1,476
Duplex[1]	25	DU	180
Single Family Detached	45	DU	424
Commercial Shopping Center[2]	9.0	TSF	609
Senior Living Facilities	120	Units	296
		Total Alternative 5 Trips	**2,985**
		Comparison between Alternative 5 and Proposed Project	*-711*

Source: Stantec 2025.
Notes: DU = Dwelling Unit; TSF = thousand square feet
(1) Used ITE Single-Family Attached Housing trip rate
(2) Shopping Center rate is based on the fitted curve equation

Utilities and Service Systems

As discussed in Section 4.18, Utilities and Service Systems, of the Draft EIR, impacts related to water, wastewater, solid waste, storm water, electricity, telecommunications, and natural gas would be less than significant, and no mitigation is required.

Under Alternative 5, a reduced development footprint is proposed when compared to the proposed project. Connections to utilities and service systems to the project site would remain. However, due to the potential decrease in population generated, a decrease in demand for potable water, electric power, natural gas, and telecommunications is anticipated. Similarly, a decrease in the generation of solid waste and wastewater is expected. The City's General Plan anticipated the residential land use proposed under this alternative. As such, Alternative 5 is consistent with the land use designation and zoning. Given this, infrastructure planning for the project site considered the potential development of this alternative. Therefore, impacts are anticipated to remain less than significant. However, impacts as a result of Alternative 5 would be **less than** the proposed project.

Wildfire

As discussed in Section 4.19, Wildfire, of the Draft EIR with implementation of mitigation measures MM-FIRE-1 through MM-FIRE-3, potential impacts associated with wildfires would be less than significant.

Under Alternative 5, a reduced development footprint is proposed when compared to the proposed project. As detailed in Section 4.19 of the Draft EIR, the project site lies within an area considered a VHFHSZ within the LRA as designated by CAL FIRE and the Los Angeles County Fire Department. There is also an expansive area of VHFHSZ SRA west of the project site on the other side of I-5 freeway. Given the existing conditions, mitigation measures MM-FIRE-1 through MM-FIRE-3 would be required to reduce impacts to less-than-significant levels. Therefore, impacts related to wildfire under Alternative 5 would be **similar to** the proposed project.

Section, 6.4.5.2, Relationship to Project Objectives

Under Alternative 5, 232 townhome and/or detached condominium residential units and 140,000 square feet senior facility/assisted living facility (120 assisted living units) are proposed on the project site. As shown in Figure 6-4, Alternative 5 Site Plan, the residential area would be 16.5 acres, and the assisted living/commercial area would be 3.5 acres. This alternative would include recreational and open spaces on site, including a park at the southern portion of the site. Table 6-10 provides a list of the project objectives and whether Alternative 5 meets each objective.

Table 6-10. Summary of Alternative 5 Success at Meeting Project Objectives

Project Objective	Alternative Meets Objective?
1. Create a new mixed-use community that allows for residential, retail/commercial, and senior housing while preserving and enhancing natural resources.	**Yes.** Under Alternative 5, townhome and/or detached condominium residential units as well as a senior living facility are proposed on site. This alternative proposes 9,000 square feet of commercial uses. Similar to the proposed project, the alternative would not develop Lot 6 of the project site and retain the land as open space. As such, Alternative 5 would meet this objective.

Table 6-10. Summary of Alternative 5 Success at Meeting Project Objectives

Project Objective	Alternative Meets Objective?
2. Provide a sensitive and protective interface with the adjacent Wiley Canyon Creek by utilizing appropriate setback, grading, landscape, buried bank stabilization and water quality treatments.	**Yes.** Under Alternative 5, an earth berm would be constructed on the site's western border along the Wiley Canyon Creek (also referred to as the South Fork of the Santa Clara River). Setbacks, grading, and landscaping would be similar to the proposed project. As shown in Figure 6-4, Alternative 5 Site Plan, a drainage basin is proposed on the southern portion of the project site. As such, Alternative 5 would meet this objective.
3. Provide development and transitional land use patterns that are compatible with surrounding communities and land uses and are consistent with the City's General Plan.	**Yes.** Alternative 5 proposes land uses that are allowable use under the City's General Plan and zoning designation Mixed Use – Neighborhood (MX-N) with a Planned Development Overlay (PD). As such, Alternative 5 would meet this objective.
4. Arrange land uses and add amenities to reduce vehicle miles traveled and to encourage the use of transit.	**Yes.** Alternative 5 would include similar recreational amenities as the proposed project on site with the proposed residential land uses, including a park. Given this, Alternative 5 would meet this objective.
5. Design neighborhoods to locate residential and non-residential land uses in close proximity to each other and major road corridors, transit and trails.	**Yes.** The proposed land uses under Alternative 5 would be primarily residential on the project site. Moreover, under this alternative, for-sale residential units would be proposed instead of for-rent under the proposed project. Given this, the alternative would result in residential land use in close proximity to surrounding residential land uses. As such, Alternative 5 would meet this objective.
6. Provide public spaces, including plazas, private and public recreational areas and trails.	**Yes.** Alternative 5 would include public and private recreational uses on site for residents and visitors, including a park on the south side of the project site. Given this, Alternative 5 would meet this objective.
7. Implement waste reduction, drought-tolerant landscaping, and use of water efficiency measures.	**Yes.** Alternative 5 would be required to comply with all applicable landscaping and water efficiency measures under the City's Municipal Code. In addition, based on the analysis provided above, this alternative is anticipated to result in reduced energy consumption and utility services. For these reasons, Alternative 5 would meet this objective.
8. Provide a meandering trail with public access along Wiley Canyon Road and within the project site along Wiley Canyon Creek.	**Yes.** Under Alternative 5, similar improvements along the South Fork of the Santa Clara River (i.e., Wiley Canyon Creek) are proposed. Given this, Alternative 5 would meet this objective.
9. Provide a landscape design emphasizing a pleasant neighborhood character and inviting streetscapes.	**Yes.** See similar discussion under Objective No. 7.
10. Enhance and augment the City's housing market by providing a variety of housing product to meet the needs of future residents.	**Yes.** Under Alternative 5, 232 townhome and/or detached condominium residential units are proposed on the project site, in addition to 120 assisted living units. Given this, Alternative 5 would meet this objective.

Table 6-10. Summary of Alternative 5 Success at Meeting Project Objectives

Project Objective	Alternative Meets Objective?
11. Maintain and enhance the use of Wiley Canyon Creek with native revegetation as a to serve as a natural channel to be utilized by wildlife.	**Yes.** See similar discussion under Objective No. 8.
12. Incorporate new oak trees into the project design, including public spaces.	**Yes.** See similar discussion under Objective No. 7.
13. Incorporate vehicle and pedestrian circulation improvements on Wiley Canyon Road and Calgrove Boulevard through the widening of the roadways where needed, as well as the addition of appropriate traffic controls at various intersections.	**Yes.** Under Alternative 5, similar improvements along Wiley Canyon Road are proposed as shown in Figure 6-4. Given this, Alternative 5 would meet this objective.
14. Provide a Class I trail and sidewalks along the roadways.	**Yes.** See similar discussion under Objective No. 8.
15. Provide publicly accessible passive and active recreational opportunities for prospective residents and existing residents in proximity to the project site.	**Yes.** See similar discussion under Objective No. 4.
16. Include amenities to specifically support senior residents requiring senior services including memory care, supporting amenities for basic-needs nursing care, and housekeeping service.	**Yes.** Alternative 5 would include 120 assisted living units on the project site. As such, this alternative would meet this objective.
17. Include recreational amenities to improve quality of life of prospective on-site residents and existing off-site residents and encourage senior living tenants to socialize and maintain active lifestyles.	**Yes.** See similar discussion under Objective No. 4 and Objective No. 16.

Section 6.5, Evaluation of Alternatives

Pursuant to the CEQA Guidelines, as well as the project objectives, a range of alternatives to the project are considered and evaluated in this EIR. To summarize these project alternatives, as suggested in CEQA Guidelines Section 15126.6(d), a matrix was prepared to summarize and compare the impacts of each project alternative (Table 6-~~9~~11).

Table 6-~~9~~11. Comparison of Project and Alternatives Impacts

Environmental Issue Area	Proposed Project	Alternative 1 No Project/ No Build	Alternative 2 Affordable Housing Alternative	Alternative 3 Private Recreational Facility Alternative	Alternative 4 Construction Noise Setback Alternative	Alternative 5 Mixed Use Alternative
Aesthetics	Less than Significant	▼	=	▲	=	=

Table 6-9<u>11</u>. Comparison of Project and Alternatives Impacts

Environmental Issue Area	Proposed Project	Alternative 1 No Project/ No Build	Alternative 2 Affordable Housing Alternative	Alternative 3 Private Recreational Facility Alternative	Alternative 4 Construction Noise Setback Alternative	<u>Alternative 5 Mixed Use Alternative</u>
Air Quality	Less than Significant with Mitigation	▼	=	▼	▼	<u>▼</u>
Biological Resources	Less than Significant with Mitigation	▼	=	=	=	<u>=</u>
Cultural Resources	Less than Significant	▼	=	=	=	<u>=</u>
Energy	Less than Significant	▼	=	▼	▼	<u>▼</u>
Geology and Soils	Less than Significant with Mitigation	▼	=	=	=	<u>=</u>
Greenhouse Gas Emissions	Less than Significant	▼	▲	▼	▼	<u>▼</u>
Hazards and Hazardous Materials	Less than Significant with Mitigation	▼	=	=	=	<u>=</u>
Hydrology and Water Quality	Less than Significant with Mitigation	▼	=	=	=	<u>=</u>
Land Use and Planning	Less than Significant with Mitigation	▼	=	=	=	<u>=</u>
Mineral Resources	Less than Significant	▼	=	=	=	<u>=</u>
Noise	Significant and Unavoidable (construction and cumulative construction)	▼ (Eliminate)	=	=	▼ (Eliminate)	<u>=</u>
Population and Housing	Less than Significant	▼	▲	▼	▼	<u>▼</u>
Public Services	Less than Significant	▼	▲	▼	▼	<u>▼</u>

Table 6-911. Comparison of Project and Alternatives Impacts

Environmental Issue Area	Proposed Project	Alternative 1 No Project/ No Build	Alternative 2 Affordable Housing Alternative	Alternative 3 Private Recreational Facility Alternative	Alternative 4 Construction Noise Setback Alternative	Alternative 5 Mixed Use Alternative
Recreation	Less than Significant with Mitigation	▼	▲	▼	▼	▼
Transportation	Less than Significant	▼	▲	▼	▼	▼
Tribal Cultural Resources	Less than Significant with Mitigation	▼	=	=	=	=
Utilities and Service Systems	Less than Significant	▼	▲	▼	▼	▼
Wildfire	Less than Significant with Mitigation	▼	=	=	=	=

Notes: = = Alternative is likely to result in similar impacts to issue when compared to project; ▼= Alternative is likely to result in reduced impacts to issue when compared to project; ▲= Alternative is likely to result in greater impacts to issue when compared to project.

In summary, Alternative 1 would result in no development on site. Consequently, all impacts would be less than the proposed project. Under Alternative 2, impacts would be greater than the proposed project for the following environmental topic areas: greenhouse gas emissions, population and housing, public services, recreation, transportation, and utilities and service systems. Other than those identified to be greater than the proposed project, Alternative 2 would generally result in similar impacts as the proposed project. Under Alternative 3, impacts related to aesthetics would be greater than the proposed project. However, noise impacts under Alternative 3 and Alternative 5, would be similar to the proposed project. Under Alternative 4, the significant construction noise impacts would be eliminated. Of note, impacts related to agriculture and forestry resources were found to be less than significant under the proposed project (see Chapter 5, Other CEQA Considerations, of this EIR). As such, a comparison of the alternatives was not considered given an analysis of the project site's existing conditions, designations, and potential restrictions (i.e., Williamson Act).

As shown in the table above, the proposed project would result in one significant and unavoidable impact related to construction noise. Alternatives 1 and 4 would eliminate the significant impact. Alternatives 2, and 3, and 5 would require the implementation of mitigation measures; however, impacts would be reduced to a less-than-significant level. All other environmental topic areas were evaluated and compared to the proposed project, in which a majority of the mitigation measures proposed within this EIR were incorporated into Alternatives 2 through 45.

Given the change in land use mix amongst the project alternatives, a trip generation analysis was prepared. In comparison to the proposed project's ADT, Alternative 2 would generate an additional 312 daily trips, Alternative 3 would generate 2,435 fewer daily trips, and Alternative 4 would generate 1,213 fewer daily trips, and Alternative 5 would generate 711 fewer daily trips. The additional 312 ADT generated by Alternative 1 is generally comparable

to the amount of traffic estimated for the proposed project and would not represent a perceptible difference (Stantec 2023). Alternatives 2 and 3 each represent a reduction in vehicle traffic compared to the proposed project. As such, impacts related to air quality and GHG emissions either increased or decreased in correlation to the anticipated trip generation.

Furthermore, a comparison of the proposed project and alternatives ability to meet project objectives is shown in Table 6-~~10~~12. As summarized below, Alternative 1 would not meet any of the project objectives. Alternatives 2 would not meet Objective No. 16, given that this alternative would not include amenities to specifically support senior residents. However, all other objectives were either met or partially met under Alternative 2. Alternative 3 would not meet Objective No. 1, 10, or 16 due to the proposed recreational facility would not include mixed uses, residential, or senior living. Alternative 4 would meet all the project objectives with the exception of partially meeting Objective No. 1 given that no retail/commercial is proposed. Alternative 5 would meet all of the project objectives.

Table 6-~~10~~12. Comparison of Project and Alternatives Meeting Project Objectives

Project Objectives		Alternative 1 No Project/ No Build	Alternative 2 Affordable Housing Alternative	Alternative 3 Private Recreational Facility Alternative	Alternative 4 Construction Noise Setback Alternative	Alternative 5 Mixed Use Alternative
1	Create a new mixed-use community that allows for residential, retail/commercial, and senior housing while preserving and enhancing natural resources.	No	Partially Yes	No	Partially Yes	Yes
2	Provide a sensitive and protective interface with the adjacent Wiley Canyon Creek by utilizing appropriate setback, grading, landscape, buried bank stabilization and water quality treatments.	No	Yes	Yes	Yes	Yes
3	Provide development and transitional land use patterns that are compatible with surrounding communities and land uses and are consistent with the City's General Plan.	No	Yes	Yes	Yes	Yes
4	Arrange land uses and add amenities to reduce vehicle miles traveled and to encourage the use of transit.	No	Partially Yes	Partially Yes	Yes	Yes

Table 6-~~10~~12. Comparison of Project and Alternatives Meeting Project Objectives

Project Objectives		Alternative 1 No Project/ No Build	Alternative 2 Affordable Housing Alternative	Alternative 3 Private Recreational Facility Alternative	Alternative 4 Construction Noise Setback Alternative	Alternative 5 Mixed Use Alternative
5	Design neighborhoods to locate residential and non-residential land uses in close proximity to each other and major road corridors, transit and trails.	No	Yes	Yes	Yes	Yes
6	Provide public spaces, including plazas, private and public recreational areas and trails.	No	Partially Yes	Partially Yes	Yes	Yes
7	Implement waste reduction, drought-tolerant landscaping, and use of water efficiency measures.	No	Yes	Yes	Yes	Yes
8	Provide a meandering trail with public access along Wiley Canyon Road and within the project site along Wiley Canyon Creek.	No	Yes	Yes	Yes	Yes
9	Provide a landscape design emphasizing a pleasant neighborhood character and inviting streetscapes.	No	Yes	Yes	Yes	Yes
10	Enhance and augment the City's housing market by providing a variety of housing product to meet the needs of future residents.	No	Yes	No	Yes	Yes
11	Maintain and enhance the use of Wiley Canyon Creek with native revegetation as a to serve as a natural channel to be utilized by wildlife.	No	Yes	Yes	Yes	Yes
12	Incorporate new oak trees into the project design, including public spaces.	No	Yes	Yes	Yes	Yes

Table 6-~~10~~12. Comparison of Project and Alternatives Meeting Project Objectives

Project Objectives		Alternative 1 No Project/ No Build	Alternative 2 Affordable Housing Alternative	Alternative 3 Private Recreational Facility Alternative	Alternative 4 Construction Noise Setback Alternative	Alternative 5 Mixed Use Alternative
13	Incorporate vehicle and pedestrian circulation improvements on Wiley Canyon Road and Calgrove Boulevard through the widening of the roadways where needed, as well as the addition of appropriate traffic controls at various intersections.	No	Yes	Yes	Yes	Yes
14	Provide a Class I trail and sidewalks along the roadways.	No	Yes	Yes	Yes	Yes
15	Provide publicly accessible passive and active recreational opportunities for prospective residents and existing residents in proximity to the project site.	No	Partially Yes	Partially Yes	Yes	Yes
16	Include amenities to specifically support senior residents requiring senior services including memory care, supporting amenities for basic-needs nursing care, and housekeeping service.	No	No	No	Yes	Yes
17	Include recreational amenities to improve quality of life of prospective on-site residents and existing off-site residents and encourage senior living tenants to socialize and maintain active lifestyles.	No	Partially Yes	Partially Yes	Yes	Yes

Section 6.6, Environmentally Superior Alternative

As indicated in Table 6-~~9~~11, Alternative 1, the No Project/No Build Alternative, would result in the least environmental impacts, and therefore would be considered the Environmentally Superior Alternative. However,

CEQA Guidelines section 15126.6(e)(2) states that if the Environmentally Superior Alternative is the No Project Alternative, the EIR must also identify an Environmentally Superior Alternative among the other alternatives.

Of the remaining alternatives previously evaluated, Alternative 4 would eliminate the significant and unavoidable impact related to construction noise. When comparing project objectives, Alternative 4 would meet all the project objectives with the exception of partially meeting Objective No. 1 given that no retail/commercial is proposed. Therefore, Alternative 4 is identified as the environmentally superior alternative given that it would meet all project objectives.

Section 6.7, References Cited

Stantec. 2023. Trip Generation Comparison for the Wiley Canyon Mixed-Use Project Alternatives. Prepared by Sandhya Perumalla and Daryl Zerfass PE, PTP. Stantec. Prepared for Wiley Canyon, LLC. November 20, 2023.

Stantec. 2025. Trip Generation for the Wiley Canyon Mixed-Use New Project Alternative. Memorandum. Prepared by Sandhya Perumalla and Darly Zerfass. April 4, 2025.



Project Summary

Residential Area: Approx. 16.5 Acres
Commercial Area: Approx. 3.5 Acres

Total Units: 232 (2-Story Homes)
- (53) 2-Story Small Lot SFD + ADU (2-car Garage)
  - (16) Plan 1: 1,600 SF; 3 bed/ 2.5 bath
  - (15) Plan 2: 1,970 SF; 4 bed/ 3 bath
  - (6) Plan 3: 2,120 SF; 4 bed/ 3 bath
  - (8) Plan 3: 1,425 SF; 3 bed/ 2 bath + (8) ADU: 840 SF; 1 bed/ 1 bath
- (179) 2-Story Townhome (2-car Garage)
  - (51) Plan 1: 1,500 SF; 3 bed/ 2.5 bath
  - (52) Plan 2: 1,600 SF; 3 bed/ 2.5 bath
  - (76) Plan 3: 1,700 SF; 4 bed/ 3 bath

Density: ±14.0 Homes per Residential Acre

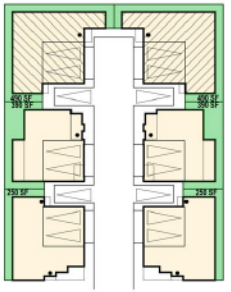
Residential Parking:
Required: 584 Spaces
- 464 Garage Spaces (2 per SFD & Townhome)
- 8 Spaces (1 per ADU)
- 112 Spaces (0.5 Guest Spaces per SFD & Townhome)

Provided: 601 Spaces (2.6 Spaces per Unit)
- 464 Garage Spaces (2-car Garage for each SFD & Townhome)
- 137 Open Spaces

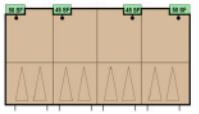
Open Space:
Required: 46,400 SF (Min. 200 SF per unit)
Provided: 120,330 SF Total
Rec Amenity= 15,000 SF
Park= 80,045 SF
Small Lot SFD= 16,850 SF Private Yards Total
Townhomes: 8,435 SF Total (50 SF or 45 SF Porch Based on Plan Type)

Commercial Parking:
Required: 1 Space/ 250 SF = 36 Spaces
Provided: 64 Spaces (includes 4 ADA Spaces)

Senior Living Facility Parking:
Required:0.5 Space/ Unit = 60 Spaces
Provided: 66 Spaces (includes 4 ADA Spaces)



2-Story SFD Court Cluster



2-Story Alley-Loaded Townhome

Notes:
1. Site plan is for conceptual purposes only.
2. Site plan must be reviewed by planning, building, and fire departments for code compliance.
3. Base information per civil engineer.
4. Civil engineer to verify all setbacks and grading information
5. Building Footprints might change due to the final design elevation style.
6. Open space area is subject to change due to the balcony design of the elevation.
7. Building setbacks are measured from property lines to building foundation lines.

SOURCE: WHA, 2025

FIGURE 6-4
Alternative 5 Site Plan
Wiley Canyon Project

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4 Mitigation Monitoring and Reporting Program

California Public Resources Code Section 21081.6 requires that, upon certification of an EIR, "the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation."

This chapter contains the mitigation monitoring and reporting program (MMRP) that has been developed for the Wiley Canyon Project (Project or proposed Project). This MMRP has been developed in compliance with Public Resources Code Section 21081.6 and Section 15097 of the CEQA Guidelines. The mitigation measures in the table are coded by alphanumeric identification consistent with the EIR. The following items are identified for each mitigation measure:

- **Mitigation Monitoring.** This section of the MMRP lists the stage of the proposed project during which the mitigation measure would be implemented and the stage during which proper implementation would be monitored and verified. It also lists the agency that is responsible for ensuring that the mitigation measure is implemented and that it is implemented properly.
- **Verification of Compliance.** This section of the MMRP provides a location for the implementing party and/or enforcing agency to make notes and to record their initials and the compliance date for each mitigation measure.

The City of Santa Clarita (City) must adopt this MMRP, or an equally effective program, if it approves the proposed Project with the mitigation measures that were adopted or made conditions of project approval.

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Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Monitoring Phase	*Monitoring Method*	*Enforcing Agency and Responsible Agency*	*Initial*	*Date*	*Comments*
Air Quality						
MM-AQ-1. Construction Equipment Features. The project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 50 horsepower (hp) or greater during project construction. Such equipment shall be outfitted with Best Available Control Technology (BACT), which means a CARB-certified Level 3 diesel particulate filter (DPF) or equivalent. An exemption from this requirement may be granted by the City if (1) the City documents equipment with Tier 4 Final engines are not reasonably available, and (2) the required corresponding reductions in criteria air pollutant emissions can be achieved for the project from other combinations of construction equipment. Before an exemption may be granted, the City shall (1) demonstrate that at least three construction fleet owners/operators in Los Angeles region were contacted and that those owners/operators confirmed Tier 4 Final equipment could not be located within Los Angeles County during the desired construction schedule, and (2) the City shall provide evidence to Mitigation Monitoring Coordination (MMC) that the proposed replacement equipment has been evaluated using California Emissions Estimator Model (CalEEMod) or other industry standard emission estimation method, and documentation has been provided to	During construction	Construction inspectors	City of Santa Clarita Planning Division, Contractor			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Monitoring Phase	*Monitoring Method*	*Enforcing Agency and Responsible Agency*	*Initial*	*Date*	*Comments*
confirm that necessary project-generated emissions reductions are achieved.						
Biological Resources						
MM-BIO-1 Crotch Bumble Bee. Surveys for Crotch bumble bee shall be conducted within one year of Project ground-disturbing. Surveys shall include 1) a habitat assessment and 2) focused surveys, both of which shall adhere to the "Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species," released by the California Department of Fish and Wildlife (CDFW) on June 6, 2023, or the most current at the time of construction. The habitat assessment shall include historical and current species occurrences; document potential habitat onsite including foraging, nesting, and/or overwintering resources; and identify which plant species are present. Focused surveys shall be performed by a qualified entomologist with appropriate handling permits and familiarity with identification, behavior, and life history of the species. Surveys shall include at least three survey passes that are not on sequential days or in the same week, preferably spaced two to four weeks apart. The timing of these surveys must coincide with the Colony Active Period (April 1 through August 31 for Crotch bumble bee). Surveys shall occur between one hour after sunrise and two hours before sunset. Surveys shall not be conducted during wet conditions (e.g., foggy, raining, or drizzling). Optimal surveys are	Prior to construction	Conduct, and provide results of pre-construction surveys	CDFW, qualified entomologist, City of Santa Clarita Planning Division, Contractor			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Monitoring Phase	*Monitoring Method*	*Enforcing Agency and Responsible Agency*	*Initial*	*Date*	*Comments*
when there are sunny to partly sunny skies that are greater than 60° Fahrenheit. Surveys may not be conducted when it is windy (i.e., sustained winds greater than 8 mph). The qualified entomologist shall look for nest/hive resources suitable for bumble bee use. Ensuring that all nest resources receive 100% visual coverage, the qualified entomologist must watch the nest resources for up to five minutes, looking for exiting or entering worker bumble bees. Worker bees should arrive and exit an active nest site with frequency, such that their presence would be apparent after five minutes of observation. If a bumble bee worker is detected, then a representative individual must be identified to species to determine if it is Crotch bumble bee or one of the common, unregulated species. It is up to the discretion of the biologist regarding the actual survey viewshed limits from the chosen vantage point which would provide 100% visual coverage; this could include a 30- to 50-foot-wide area. If a nest is suspected, the surveyor can block the entrance of the possible nest with a sterile vial or jar until nest activity is confirmed (no longer than 30 minutes). Identification shall include the qualified entomologist netting/capturing the representative bumble bee in appropriate insect nets, per the protocol in U.S. National Protocol Framework for the Inventory and Monitoring of Bees. If Crotch bumble bee nests are not detected, no further mitigation is required. However, if construction in a given phase area does not start						

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
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within a year of the last survey, surveys shall be repeated for that phase area. Additionally, if construction stops for 14 days or longer, surveys would be repeated if construction resumes in the nesting season. Outside of the nesting season, it is assumed that no live individuals would be present within the nest as the daughter queens (gynes) usually leave by September, and all other individuals disperse to outside of the construction footprint to surrounding open space areas. Following the habitat assessment and focused surveys, a written survey report shall be submitted to the City and CDFW prior to Project activities. The report will include survey methods, weather conditions, a description and map of the survey area, and survey results, including a list of insect species observed and a figure showing the locations of any Crotch bumble bee nest sites or individuals observed. The survey report shall include the qualifications/resumes of the entomologist(s) for identification of photo vouchers, detailed habitat assessment, and photo vouchers. If Crotch bumble bee are observed, the qualified entomologist shall provide the location of all nests within and adjacent to the Project site. The survey report shall also include the physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. This shall include native plant composition (e.g., density, cover, and abundance) within affected habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species). The qualified entomologist shall						

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
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also draft an Avoidance Plan with specific avoidance measures that will be implemented prior to and during Project activities. The Avoidance Plan shall be submitted to CDFW prior to Project activities for review. Upon CDFW approval of an Avoidance Plan, the qualified entomologist shall demarcate an appropriate buffer zone around all identified nest(s). If complete avoidance of Crotch's bumble bee is not feasible, the Project proponent shall continue consultation with CDFW to determine if take authorization from CDFW is required. Any measures determined to be necessary through the Incidental Take Permit process to offset impacts to Crotch bumble bee may supersede measures provided in this CEQA document. In the event an Incidental Take Permit is needed, the Project proponent shall provide compensatory mitigation at a minimum 1:1 nesting habitat replacement of equal or better functions and values to those impacted by the project, or as otherwise determined through the Incidental Take Permit process. Mitigation shall be accomplished either through off-site conservation and the Project proponent shall provide an endowment determined through the Incidental Take Permit process.						
MM-BIO-2. Least Bell's Vireo. Before starting construction, a qualified biologist must conduct eight focused surveys within suitable least Bell's vireo habitat between April 10 and July	Prior to construction	Conduct, and provide results of pre-construction surveys	USFWS, qualified biologist, City of Santa Clarita			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Monitoring Phase	*Monitoring Method*	*Enforcing Agency and Responsible Agency*	*Initial*	*Date*	*Comments*
31, and be spaced a minimum of 10 days apart, in accordance with the 2001 United State Fish and Wildlife Service (USFWS) Least Bell's Vireo Survey Guidelines. The eight focused protocol surveys must be completed, and the results of the surveys be submitted in a draft report to the City for review within 21 days of the completion of surveys. A final report must be prepared and submitted to the City and USFWS within 45 days following the completion of the surveys. If least Bell's vireo is determined to be absent, no further action is required. If least Bell's vireo is determined to be present based on the results of the protocol surveys, no construction may begin before consulting with California Department of Fish and Wildlife (CDFW) and USFWS for compliance with both the federal and State endangered species acts. Compensatory mitigation for impacts to 0.78 acre of marginally suitable least Bell's vireo habitat must be achieved in conjunction with Mitigation Measure BIO-4 for impacts to a jurisdictional drainage with mitigation ratio of at least 2:1.			Planning Division, Contractor			
MM-BIO-3. Nesting Birds. Before construction that would require removal of potential habitat for raptor and songbird nests between January 15 and September 1, the Project applicant must have a qualified biologist that is approved by the City conduct surveys for any and all active avian nests. Pre-construction nesting bird surveys must be conducted	Prior to construction	Conduct, and provide results of pre-construction surveys	City-approved biologist, City of Santa Clarita Planning Division, Contractor			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Monitoring Phase	*Monitoring Method*	*Enforcing Agency and Responsible Agency*	*Initial*	*Date*	*Comments*
weekly, within 30 days before initiation of ground-disturbing activities to determine the presence of active nests. The surveys should continue on a weekly basis with the last survey being conducted not more than three days before the start of clearance/construction work. Surveys should include examination of trees, shrubs, and the ground, within grasslands, for nesting birds, as several bird species known to the area are shrub or ground nesters, including mourning doves. If ground-disturbing activities are delayed, additional preconstruction surveys may be recommended by the City so that not more than three days elapse between the survey and ground-disturbing activities. If active nests are located during pre-construction surveys, clearing and construction activities within 300 feet of the nest (500 feet for raptors) must be postponed or halted until the nest is vacated and juveniles have fledged, as determined by the biologist, and there is no evidence of a second attempt at nesting. Limits of construction to avoid an active nest must be established in the field with flagging, fencing, or other appropriate barriers and construction personnel should be instructed on the sensitivity of nest areas. The nest buffers may be reduced by the monitoring biologist when there is a biologist present to observe the nest for changes in behavior. The biologist must serve as a construction monitor during those						

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
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periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur. The results of the survey, and any avoidance measures taken, shall be submitted to the City within 30 days of completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.						
MM-BIO-4. Sensitive Plant Communities. Before the Building Official issues a grading permit, impacts to sensitive plant communities (e.g., Fremont cottonwood/mulefat forest, Fremont cottonwood forest, and California sycamore woodland) must be mitigated through enhancement or restoration of remaining on-site sensitive plant communities at a ratio of 1:1 or the creation of new sensitive plant communities within the newly created channel area. A habitat mitigation and monitoring plan must be prepared by a City-approved biologist or restoration ecologist and approved by the City before the Public Works Director, or designee, issues a grading permit. The mitigation and monitoring plan must focus on the removal of nonnative elements within disturbed habitat areas of the project site or depict creation areas, planting/restoration methods and success criteria. In addition, this plan must provide details as to its implementation, maintenance, and future monitoring including the following components:	Prior to issuance of a grading permit and during construction activities	Completion of a habitat mitigation and monitoring plan	City-approved biologist or restoration ecologist, City of Santa Clarita's Public Works Director, City of Santa Clarita Planning Division, Contractor			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Monitoring Phase	*Monitoring Method*	*Enforcing Agency and Responsible Agency*	*Initial*	*Date*	*Comments*
• Description of existing sensitive plant communities on the Project site; • Summary of permanent impacts to the sensitive community based on approved Project design; • Proposed mitigation location areas, with description of existing conditions prior to mitigation implementation; • Detailed description of restoration or enhancement goals; • Description of implementation schedule, site preparation, erosion control measures, planting plans, and plant materials; • Provisions for mitigation site maintenance and control on non-native invasive plants; and • Monitoring plan, including performance standards, adaptive management measures, and • Monitoring reporting to the City of Santa Clarita Alternatively, mitigation for sensitive plant community impacts may be achieved through off-site restoration or enhancement at a ratio no less than 1:1 and may include the purchase of mitigation credits at an agency-approved off-site mitigation bank or an in lieu fee program within Los Angeles County acceptable to the City.						

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MM-BIO-5. Jurisdictional Aquatic Resources. Before the Public Works Director, or designee, issues any grading permit for permanent or temporary impacts in the areas designated as jurisdictional features, the applicant must obtain a Clean Water Act Section 404 permit from the United States Army Corps of Engineers (USACE), a Clean Water Act Section 401 permit from the Regional Water Quality Control Board (RWQCB), and Streambed Alteration Agreement permit under Fish and Game Code Section 1602 from the California Department of Fish and Wildlife (CDFW). The following shall be incorporated into the permitting, subject to approval by the regulatory agencies: • On- or off-site restoration or enhancement of USACE/RWQCB jurisdictional "waters of the U.S."/"waters of the State" and wetlands at a ratio no less than 2:1 for permanent impacts, and for temporary impacts, restore impact area to pre-project conditions (i.e., revegetate with native species, where appropriate). Off-site restoration or enhancement at a ratio no less than 2:1 may include the purchase of mitigation credits at an agency-approved off-site mitigation bank or in lieu fee program within Los Angeles County or within the same watershed acceptable to the City, where the location has comparable ecological	Prior to issuance of a grading permit	Permit obtainment, wetland and riparian restoration (conditions of permit approval)	City of Santa Clarita's Public Works Director, Project Applicant, USACE, RWQCB, CDFW			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Monitoring Phase	*Monitoring Method*	*Enforcing Agency and Responsible Agency*	*Initial*	*Date*	*Comments*
parameters such as habitat types and species mix; • On- or off-site restoration or enhancement of CDFW jurisdictional streambed and associated riparian habitat at a ratio no less than 2:1 for permanent impacts, and for temporary impacts, restore impact area to pre-project conditions (i.e., revegetate with native species, where appropriate). Off-site restoration or enhancement at a ratio no less than 2:1 may include the purchase of mitigation credits at an agency-approved off-site mitigation bank or in-lieu fee program within Los Angeles County or within the same watershed acceptable to the City, here the location has comparable ecological parameters such as habitat types and species mix.						
Cultural Resources						
MM-CUL-1. Retention of a Qualified Archaeologist. Before the Public Works Director, or designee, issues grading permit and before starting any ground-disturbing activity, the applicant must retain a qualified archaeologist, defined as one meeting the Secretary of the Interior's Professional Qualification Standards for archeology (U.S. Department of Interior 1983) to carry out all mitigation measures related to archeological resources.	Prior to grading permit issuance and ground-disturbing activity	Retention of a qualified archaeologist	Project archaeologist, City of Santa Clarita Public Works Director			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Monitoring Phase	*Monitoring Method*	*Enforcing Agency and Responsible Agency*	*Initial*	*Date*	*Comments*
MM-CUL-2. Cultural Resources Sensitivity Training. Before starting ground-disturbing activities, the qualified archaeologist must conduct cultural resources sensitivity training for all construction personnel. Construction personnel will be informed of the types of archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. The applicant must ensure that construction personnel attend the training and retain documentation demonstrating attendance.	Prior to construction	Cultural resources sensitivity training	Project archaeologist, City of Santa Clarita Planning Division, Project Applicant			
MM-CUL-3. Archaeological and Native American Monitoring. An archaeological monitor (working under the direct supervision of the qualified archaeologist) and a Native American monitor must be present during all ground-disturbing activities within areas of the Project mapped as containing Holocene-age undifferentiated alluvium. The qualified archaeologist, in coordination with the City's Project Manager, may reduce or discontinue monitoring if it is determined that the possibility of encountering buried archaeological deposits is low based on observations of soil stratigraphy or other factors. Archaeological monitoring must be conducted by an archaeologist familiar with the types of archaeological resources that could be encountered within the Project area. The Native American monitor must be selected from the Native American groups identified by	Prior to ground-disturbing activities, during construction, in the event of a discovery	Presence of construction monitors, completion of daily logs, final monitoring report	Project archaeologist, archaeological monitor, Native American monitor, City's Project Manager, applicable Native American tribes, City of Santa Clarita Planning Division			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Monitoring Phase	*Monitoring Method*	*Enforcing Agency and Responsible Agency*	*Initial*	*Date*	*Comments*
the Native American Heritage Commission (NAHC) as having affiliation with the Project area. The archaeological monitor and Native American monitor are empowered to halt or redirect ground-disturbing activities away from the vicinity of a discovery until the qualified archaeologist has evaluated the discovery and determined appropriate treatment. The archaeological monitor must keep daily logs detailing the types of activities and soils observed, and any discoveries. After monitoring is completed, the qualified archaeologist must prepare a monitoring report that details the results of monitoring. The report must be submitted to the City and any Native American groups who request a copy. A copy of the final report must be filed at the SCCIC.						
MM-CUL-4. Inadvertent Discovery of Archaeological Resources. Should unanticipated discovery of archaeological materials occur, the contractor must immediately cease all work activities in the area (within approximately 100 feet) of the discovery until it can be evaluated by a qualified archaeologist. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or tool-making debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools,	During construction, in the event of a discovery	Presence of a construction monitor	Project archaeologist, archaeological monitor, City of Santa Clarita's Project Manager, Native American representatives			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
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such as hammerstones and pitted stones. Historic-period materials might include stone or concrete footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. Construction may not resume until the qualified archaeologist has conferred with the City's Project Manager on the significance of the resource. If it is determined by the qualified archaeological monitor that the discovered archaeological resource constitutes a historical resource or unique archaeological resource under CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place maintains the important relationship between artifacts and their archaeological context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Data Recovery and Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with the City that provides for the adequate recovery of the scientifically						

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Monitoring Phase	*Monitoring Method*	*Enforcing Agency and Responsible Agency*	*Initial*	*Date*	*Comments*
consequential information contained in the archaeological resource. The qualified archaeologist and City's Project Manager must consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond those that are scientifically important, are considered.						
MM-CUL-5. Inadvertent Discovery of Human Remains. If human remains are encountered, the contractor must halt work in the vicinity (within 100 feet) of the discovery and contact the Los Angeles County Coroner in accordance with Public Resources Code (PRC) section 5097.98 and Health and Safety Code section 7050.5. The City's Project Manager must also be notified. If the County Coroner determines the remains are Native American, the Native American Heritage Commission NAHC must be notified in accordance with Health and Safety Code section 7050.5(c) and PRC Section 5097.98. The NAHC will designate a most likely descendent (MLD) for the remains per PRC section 5097.98. Until the landowner has conferred with the MLD, the contractor must ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further activities take into account the possibility of multiple burials.	During construction, in the event of a discovery	Presence of construction monitor	LA County Coroner, City of Santa Clarita's Project Manager, NAHC (if applicable)			

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	Monitoring Phase	*Monitoring Method*	*Enforcing Agency and Responsible Agency*	*Initial*	*Date*	*Comments*
Geology and Soils						
MM-GEO-1. Retain Qualified Paleontologist. Before starting construction activities, the developer must retain a Qualified Paleontologist that meets the standards of the Society for Vertebrate Paleontology (SVP) (2010) to carry out all mitigation measures related to paleontological resources.	Prior to construction	Retention of a qualified paleontologist	Qualified paleontologist, Project developer			
MM-GEO-2. Paleontological Resources Sensitivity Training. Before any person commences ground-disturbing activities, the Qualified Paleontologist must conduct pre-construction worker paleontological resources sensitivity training. The training must include information on what types of paleontological resources could be encountered during excavations, what to do in case an unanticipated discovery is made by a worker, and laws protecting paleontological resources. All construction personnel must be informed of the possibility of encountering fossils and instructed to immediately inform the construction foreman or supervisor if any bones or other potential fossils are unexpectedly unearthed in an area where a paleontological monitor is not present. The developer must ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.	Prior to ground-disturbing activities	Paleontological resources sensitivity training	Qualified paleontologist, Project developer			
MM-GEO-3. Paleontological Monitoring. The Qualified Paleontologist must supervise a paleontological monitor meeting the SVP	During construction	Presence of a paleontological monitor, preparation	Qualified Paleontologist, City of Santa Clarita's			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
	Monitoring Phase	*Monitoring Method*	*Enforcing Agency and Responsible Agency*	*Initial*	*Date*	*Comments*
standards (2010) and be present during all excavations extending beyond a depth of 5 feet. Monitoring must consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened standard sediment samples (up to 4.0 cubic yards) of promising horizons for smaller fossil remains (SVP 2010). Per the SVP standards (2010), once 50 percent of excavations or other ground disturbing activities are complete within geologic units assigned high paleontological sensitivity and no fossils are identified, monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the Qualified Paleontologist in consultation with the City's Project Manager. Monitoring activities must be documented in a Paleontological Resources Monitoring Report to be prepared by the Qualified Paleontologist at the completion of construction and be provided to the City within six months of Project completion. If fossil resources are identified during monitoring, the report will also be filed with the Natural History Museum of Los Angeles County.		of a Paleontological Resources Monitoring Report	Project Manager, City of Santa Clarita Planning Division, Natural History Museum of Los Angeles County (if applicable)			
MM-GEO-4. Inadvertent Discoveries. If a paleontological resource is discovered during construction, the paleontological monitor is empowered to temporarily divert or redirect grading and excavation activities in the area of the exposed resource to facilitate evaluation of the discovery. An appropriate buffer area must be established by the Qualified	During construction, in the event of a discovery	Presence of a paleontological monitor	Paleontological monitor, Qualified Paleontologist			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
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Paleontologist around the find where construction activities shall not be allowed to continue. Work may be allowed to continue outside of the buffer area. At the Qualified Paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor must assist in removing rock samples for initial processing and evaluation of the find. All significant fossils must be collected by the paleontological monitor and/or the Qualified Paleontologist. Collected fossils must be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected must be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they may be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs must also be filed at the repository and/or school.						
Hazards and Hazardous Materials						
See MM-FIRE-1 through MM-FIRE-3						
Hydrology and Water Quality						
MM-HYD-1. The applicant must submit an application for a Letter of Map Revision (LOMR) from the Federal Emergency Management Agency (FEMA) along with a hydrology and hydraulics report prepared by a California licensed engineer. The LOMR must	Prior to construction	Application submission, hydrology and hydraulics report	Project Applicant, FEMA, California licensed engineer			

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be based on the implementation of all physical measures that affect the hydrologic or hydraulic characteristics of the flooding source for the site that are to be included as part of the project before obtaining a building permit. The hydrologic and hydraulics report must demonstrate how modification of the existing regulatory floodway or the Special Flood Hazard Area for the project site will reduce flooding risks to within FEMA requirements. Once the LOMR is approved by FEMA and revises the Flood Insurance Rates Map or Flood Boundary and Floodway Map for the project site, construction of the proposed project may commence in accordance with applicable law.						
Land Use and Planning						
See MM-AQ-1, MM-BIO-1 through MM-BIO-5, MM-HYD-1, MM-NOI-1 through MM-NOI-2, and MM-FIRE-1 through MM-FIRE-3						
Noise						
MM-NOI-1. Construction equipment within 200 feet of the northern and eastern boundary of the project site is limited to small, reduced noise equipment that has a maximum noise generation level of 77 dBA L_{eq} at 50 feet. This measure also applies to construction equipment during the later phases of construction for residential buildings within 200 feet of the Senior Living Building after it is occupied.	During construction	Review of plans and specifications, construction inspections	Contractor, City of Santa Clarita Planning Division			
MM-NOI-2. Construction noise barriers must be installed during project construction with sufficient height to block the line-of-sight between the project construction area and	During construction	Construction inspections	Contractor, City of Santa Clarita Planning Division			

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adjacent sensitive receivers, including proposed on-site residential uses that are completed and occupied while construction in other parts of the project site continues.						
Recreation						
See MM-AQ-1, MM-BIO-1 through MM-BIO-4, MM-CUL-1 through MM-CUL-5, MM-GEO-1 through MM-GEO-4, MM-NOI-1 through MM-NOI-2, and MM-FIRE-1 through MM-FIRE-3						
Tribal Cultural Resources						
See MM-CUL-1 through MM-CUL-5						
Wildfire						
MM-FIRE-1. Extreme Fire Day Ignition Avoidance. All construction and maintenance activities must temporarily cease during Red Flag Warnings. The contractor's superintendent must coordinate with personnel to determine which low fire hazard activities may occur. Should the Fire Department declare a Red Flag Warning affecting the Wiley Canyon Project site, the same work activity restrictions occurring during National Weather Service Red Flag Warning periods apply.	During construction	Construction avoidance	Contractor, Contractor's superintendent			
MM-FIRE-2. Pre-Construction Requirements. Vegetation management must be conducted before the start of construction and throughout all construction phases. Perimeter fuel modification must be implemented and approved by the Fire Department before bringing combustible materials on site. Existing flammable vegetation must be reduced by 50% on vacant lots upon commencement of construction. Caution must	Prior to construction	Construction inspections	Contractor, Los Angeles County Fire Department, City of Santa Clarita Planning Division			

Mitigation Measure	Mitigation Monitoring			Verification of Compliance		
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be used to avoid causing erosion or ground (including slope) instability or water runoff due to vegetation removal, vegetation management, maintenance, landscaping or irrigation. Before delivering lumber or combustible materials onto the site, site improvements within the active development area must be in place, including utilities, operable fire hydrants, an approved, temporary roadway surface, and fuel modification zones established. These features must be approved by the Fire Department before combustibles being brought on site.						
MM-FIRE-3. LACFD FMZ Plant Selection Guideline Compliant. The Fire Department publishes a list of plants that would not contribute to extreme fire behavior are suitable for Fuel Modification Zones. All plants included within fuel modification zones of the proposed project must be from this list and if a minimum distance from structures is stated for the species, such listed species may not be planted closer to any structures associated with the proposed project than the stated minimum distance. No plant that is not listed by the Fire Department on its Fuel Modification Zone Plant Selection Guidelines may be included within a Fuel Modification Zone of the proposed Project without approval by Fire Department.	Prior to construction	Construction inspections	Contractor, Los Angeles County Fire Department, City of Santa Clarita Planning Division			