Final Recirculated Environmental Impact Report

Centennial Specific Plan Project

Prepared for

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1.0 INTRODUCTION AND SUMMARY

1.1 INTRODUCTION

This Final Recirculated Environmental Impact Report ("Final Recirculated EIR") has been prepared by the County of Los Angeles Department of Regional Planning, acting as the "Lead Agency," for the Centennial Specific Plan ("Project"). This Final Recirculated EIR has been prepared consistent with California Environmental Quality Act (CEQA) statutes (Cal. Pub. Res. Code, Sections 21000 et seq., as amended) and implementing guidelines (Cal. Code Regs., Title 14, Sections 15000 et seq.). This Final Recirculated EIR constitutes a distinct volume within the overall environmental review documentation for the Project. It supplements and is a component of the previously published Draft EIR (SCH No. 2004031072) ("Draft EIR"), 2019 Final EIR (SCH No. 2004031072) ("2019 Final EIR") and Consolidated 2019 Final EIR (SCH No. 2004031072) ("Consolidated 2019 Final EIR") (excluding chapters or sections removed, revised, or replaced by Recirculated Partial Draft EIR) and the Recirculated Partial Draft EIR ("RPDEIR"), collectively forming the complete set of the Revised Final EIR documents evaluated by the County in connection with the Project's environmental review.

Before approving a project, CEQA requires that the Lead Agency prepare and certify a Final EIR per State CEQA Guidelines Section 15090. As Lead Agency, the County has the principal responsibility for approval of the Project. The Revised Final EIR includes the following components:

- Draft EIR , as revised by the RPDEIR and this Final Recirculated EIR;
- 2019 Final EIR, as revised by the RPDEIR and this Final Recirculated EIR;
- Consolidated 2019 Final EIR, as revised by the RPDEIR and this Final Recirculated EIR (collectively, the Draft EIR, 2019 Final EIR, and Consolidated 2019 Final EIR are referred to as the "Centennial EIR");
- RPDEIR (SCH No. 2024031142); and
- Final Recirculated EIR (SCH No. 2024031142), including:
    - Comments and recommendations received on the RPDEIR either verbatim or in summary;
    - A list of persons, organizations, and public agencies commenting on the RPDEIR;
    - The County's responses to significant environmental points raised in the review and consultation process; and
    - Other information added by the County.

The information contained within the Revised Final EIR will be considered by applicable decisionmakers in determining whether to grant the necessary Project approvals. The County prepared this Final Recirculated EIR following the Second District Court of Appeal decision in *Center For Biological Diversity et al. v. County of Los Angeles et al.* (2025) 112

Cal.App.5th 317, issued on June 26, 2025. The decision affirmed the trial court judgment that granted in part and denied in part the Center for Biological Diversity and California Native Plant Society's (referred to collectively herein as "CBD/CNPS") petition for writ of mandate challenging the Centennial EIR and the County's 2019 approval of the Project under CEQA.

1.2 PUBLIC REVIEW PROCESS

The RPDEIR underwent two public review and comment periods pursuant to State CEQA Guidelines Section 15087. Refer to Appendix A, *Notices of Availability.*

The initial RPDEIR was made available for public review for 45 calendar days, from May 28, 2026, to July 12, 2026. This review period covered the initial scope of the document, including Section 1.0 (Introduction) and Sections 2.1 through 2.3 (Biological Resources, Climate Change, and Wildfire). Notification of this period was provided to the State Clearinghouse; local, trustee, and responsible agencies; and interested parties on May 29, 2026.

Following the initial review, the County determined that recirculation was warranted due to an administrative error regarding the omission of Section 3.0 (Cumulative Impacts) and a labeling correction in Section 2.1 (Biological Resources). Consequently, the RPDEIR was recirculated in its entirety for a new 45-day public review and comment period from June 30, 2026, to August 13, 2026. The recirculated RPDEIR was received by the State Clearinghouse (SCH No. 2024031142) on June 29, 2026, and all parties were re-notified.

During these periods, the RPDEIR was available for review at the Los Angeles County Department of Regional Planning website (https://planning.lacounty.gov/long-range-planning/centennial-specific-plan/) and at the following physical locations:

- **County of Los Angeles Building and Safety, Antelope Valley Field Office:** 335 East Avenue K-6 #A, Lancaster, CA 93535 (Monday–Friday, 8:00 a.m. to 4:30 p.m.)
- **Castaic Library:** 27971 Sloan Canyon Road, Castaic, CA 91384 (Monday–Thursday, 10:00 a.m. to 8:00 p.m.; Friday–Saturday, 10:00 a.m. to 6:00 p.m.)

Written comments regarding the RPDEIR were required to be submitted no later than August 13, 2026, at 5:00 p.m.

Because the only "significant new information" requiring recirculation pursuant to CEQA Guidelines section 15088.5 relates to Climate Change, Wildfire, and potential impacts to Crotch's bumble bee, the RPDEIR was limited to revising only those portions of the Centennial EIR, and only those revised portions of the Centennial EIR were recirculated for public review and comment in accordance with Subdivision (c) of State CEQA Guidelines Section 15088.5, and reviewers were requested to limit comments to the content of the RPDEIR. Responses to comments already received on the Draft EIR were prepared previously and are included in the 2019 Final EIR and Consolidated 2019 Final EIR, which is part of the Revised Final EIR for the Project.

2.0 RESPONSE TO COMMENTS

The following is a list of public agencies, organizations, and persons that submitted comments on the RPDEIR. Comments have been numbered and responses have been developed with corresponding letters/numbers.

2.1 LIST OF WRITTEN COMMENTERS

A list of the public agencies, organizations, and persons that submitted written comments on the RPDEIR is provided in Table 2-1, *Comments Received on the Public Review RPDEIR from Public Agencies, Organizations, and Individuals*.

TABLE 2-1
COMMENTS RECEIVED ON THE PUBLIC REVIEW RPDEIR FROM PUBLIC AGENCIES, ORGANIZATIONS, AND INDIVIDUALS

Comment Letter	Date	Name
Public Agencies		
A.1	June 24, 2026	California Highway Patrol (CHP)
A.2	July 7, 2026	California Department of Water Resources (DWR)
A.3	July 24, 2026	California Highway Patrol (CHP)
A.4	August 7, 2026	State of California Department of Fish and Wildlife (CDFW)
A.5	August 10, 2026	California Highway Patrol (CHP)
Organizations/Companies		
B.1	July 1, 2026	Lozeau Drury LLP
B.2	July 2, 2026	Center for Biological Diversity (Center)
B.3	July 7, 2026	Southern California Edison (SCE)
B.4	August 13, 2026	Center for Biological Diversity (Center) and the California Native Plant Society (CNPS)
B.5	August 13, 2026	Adams Broadwell Joseph & Cardozo Attorneys at Law on behalf of Coalition for Responsible Equitable Economic Development Los Angeles (CREED LA)
Individuals		
C.1	June 5, 2026	Myong Hwa Lim

2.2 COMMENTS AND RESPONSES

All comment letters received by the County during the 45-day public review periods for the RPDEIR and recirculated RPDEIR have been included and responded to in this Final Recirculated EIR. Comments that raise environmental issues have been addressed in these responses. Comments that do not require a response include those that (1) do not address the adequacy or completeness of the RPDEIR; (2) do not raise substantive

environmental/CEQA issues; (3) do not address the Project; or (4) request the incorporation of additional information not relevant to environmental issues.

Regarding the evaluation and response to comments, Section 15088 of the State CEQA Guidelines states:

a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response. The Lead Agency shall respond to comments raising significant environmental issues received during the noticed comment period and any extensions and may respond to late comments;

b) The Lead Agency shall provide a written proposed response, either in a printed copy or in an electronic format, to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report;

c) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the Lead Agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice. The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment; and

d) The response to comments may take the form of a revision to the Draft EIR or may be a separate section in the Final Recirculated EIR. Where the response to comments makes important changes in the information contained in the text of the Draft EIR, the lead agency should either:

    1. Revise the text in the body of the EIR; or

    2. Include marginal notes showing that the information is revised in the response to comments.

With respect to comments letters received, aside from certain courtesy statements, introductions, and closings, individual comments within the body of each letter have been identified and numbered. Brackets delineating the individual comments and a numeric identifier have been added to the right margin of the letter. The County's responses to each applicable comment are included in this section. Responses are delineated to match the numeric identifier of each comment letter.

In the process of responding to the comments, there were minor revisions to the text of the RPDEIR shown in this section and in Section 3.0, *Corrections, Clarifications, and Additions to the RPDEIR, Draft EIR, 2019 Final EIR, and Consolidated 2019 Final EIR as Relevant to the RPDEIR*, of this Final Recirculated EIR. None of the comments or responses constitute "significant new information" as that term is defined in Section 15088.5 of the California Code of Regulations, and, therefore, none of the conditions set forth in Section 15088.5 of the State CEQA Guidelines that would require recirculation of the RPDEIR have been met. Therefore, this Response to Comments section, Section 3.0, *Corrections, Clarifications, and Additions to the RPDEIR, Draft EIR, 2019 Final EIR, and Consolidated 2019 Final EIR as Relevant to the RPDEIR*, are included as part of this Final Recirculated EIR along with the RPDEIR, Draft EIR, 2019 Final EIR, and Consolidated 2019 Final EIR for consideration by the County Regional Planning Commission and ultimately the County Board of Supervisors.

2.2.1 TOPICAL RESPONSE A: SCOPE OF RECIRCULATED PARTIAL DRAFT EIR

Several recurring comments were raised during the public review process related to the scope of the RPDEIR. This topical response addresses those comprehensively and is cross-referenced in numerous individual responses below to ensure that each comment is thoroughly addressed and minimize repetition.

As described in Section 1.0 of the RPDEIR, the original Centennial Project Draft Environmental Impact Report, inclusive of appendices ("Draft EIR"), was prepared in 2017. At that time, the Draft EIR was circulated for public review for a total of approximately 90 days, from May 18, 2017, to August 16, 2017. Following the 2017 public review period, the County reviewed all comments received on the Draft EIR and prepared the 2019 Final EIR and Consolidated 2019 Final EIR. The 2019 Final EIR and Consolidated 2019 Final EIR included the Draft EIR, Draft EIR clarifications and revisions, a list of all persons, organizations, and public agencies that commented on the Draft EIR, responses to comments on the Draft EIR, and other information. Collectively, the Draft EIR, 2019 Final EIR, and Consolidated 2019 Final EIR are referred to as the "Centennial EIR."

In April 2019, the County Board of Supervisors approved the Project and certified the Centennial EIR. As certified, the Centennial EIR scope included the following issue areas: Geotechnical; Hydrology and Flood; Hazards and Fire Safety; Water Quality; Land Resources (Agricultural, Forestry, and Mineral Resources); Cultural and Tribal Resources; Biological Resources; Land Use, Entitlements, and Planning; Population, Housing, and Employment; Traffic, Access, and Circulation; Air Resources; Noise; Visual Resources; Parks and Recreation; Education; Fire and Law Enforcement Services; Other Public Services (Library, Solid Waste, and Other Public Facilities); Water Resources; Wastewater Collection; Dry Utilities (Electrical, Fossil Fuels [Natural Gas and Petroleum], Telephone, and Cable Service); Climate Change; Growth- Inducing Impacts; Cumulative Impacts; and Alternatives to the Proposed Project.

In May 2019, Climate Resolve and CBD/CNPS filed lawsuits challenging the Centennial EIR (collectively, the "Centennial Litigation"). The Centennial Litigation sought to set aside the County's certification of the Centennial EIR and approval of the Project. CBD/CNPS alleged a wide range of CEQA violations, including, but not limited to, failure to analyze adequately and/or mitigate aesthetic, recreational, and biological impacts; greenhouse gas ("GHG") emissions, noise impacts, transportation and traffic impacts, population and housing impacts, water quality impacts, air quality impacts, seismic impacts, water supply risks and impacts, and failure to adequately analyze alternatives. Climate Resolve alleged that the Centennial EIR failed to adequately analyze and mitigate GHG emissions and wildfire risk.

In April 2021, the Superior Court issued two orders (collectively, the "Superior Court Order") (a) rejecting all CBD/CNPS claims and arguments that the Centennial EIR was deficient under CEQA, (b) upholding the vast majority of the Centennial EIR, and (c) granting in part Climate Resolve's petition for writ of mandate on two grounds—(1) the Centennial EIR's discussion of GHG emissions improperly relied on state cap-and-trade regulations to reduce GHG emissions impacts below the level of significance and (2) the Centennial EIR failed to analyze off-site wildfire impacts beyond the Project site. In March 2023, after initially denying in full CBD/CNPS's petition for writ of mandate, the Superior Court, following CBD/CNPS's motion for reconsideration, entered judgment (a) in favor of CBD/CNPS solely on the GHG emissions and off-site wildfire impacts grounds raised in the Climate Resolve petition and (b) in favor of the County on all other claims and causes of action (the "Judgment"). The Superior Court ordered issuance of a writ of mandate directing the County to set aside its certification of the Centennial EIR and the Project and suspending all Project activity until the County complies with the requirements of CEQA with respect to the Centennial EIR deficiencies identified in the Superior Court Order (the "Writ").

In May 2023, the Project Applicant appealed the Judgment to the Second District Court of Appeal, and CBD/CNPS filed a cross-appeal in June 2023. In June 2025, the Second District Court of Appeal issued its decision in *Center For Biological Diversity et al. v. County of Los Angeles et al.* (2025) 112 Cal.App.5th 317 ("Opinion") affirming the Judgment. The published portion of the Opinion held that the Centennial EIR failed to comply with CEQA because (1) it improperly applied the state cap-and-trade program to the Project GHG emissions analysis and mitigation, and (2) its analysis of the wildfire risks associated with the Project's off-site infrastructure improvements lacked sufficient detail to enable those who did not participate in its preparation to consider meaningfully the Centennial EIR's conclusion of less than significant off-site wildfire impacts.

In September 2025, the Court of Appeal issued remittitur, thereby transferring jurisdiction over the Centennial Litigation back to the Superior Court. Thereafter, on September 22, 2025, the Superior Court issued the Writ.

On December 2, 2025, in compliance with the Writ, the Board of Supervisors adopted a resolution (i) vacating and setting aside all approvals and adoption of the Centennial Project Approvals, (ii) vacating and setting aside certification of the Centennial EIR, the Findings, Statement of Overriding Consideration, and Mitigation Monitoring and Reporting Program adopted in connection with the Centennial Project, and (iii) suspending any and all specific

project activity or activities, pursuant to the Centennial Project Approvals that could result in an adverse change or alteration to the physical environment, unless and until the County complies with the requirements of CEQA. On December 19, 2025, the County filed the return to the Writ in the Superior Court and a Proposed Order discharging the Writ.

The RPDEIR, which the County circulated for public review between May 28 and August 13, 2026, addressed the deficiencies identified in the Opinion. Specifically, the RPDEIR updated and provided additional analysis for the Centennial EIR's discussion of Climate Change and Wildfire. While the Opinion did not find any inadequacies in the Centennial EIR's analysis of Biological Resources, the RPDEIR also includes partial revision to the Biological Resources analysis to address potentially significant impacts to Crotch's bumble bee and mitigation to reduce those potential impacts to less than significant and portions of the analysis of Cumulative Impacts related to Climate Change, Wildfire, and Biological Resources. Therefore, the RPDEIR has revised portions of the Centennial EIR as follows:

- Updated Partial Biological Resources analysis as to impacts of the Project to Crotch's bumble bee (RPDEIR Section 2.1).
- Updated Climate Change/Greenhouse Gas Emissions analysis as to eliminating discussion of the state cap-and-trade program to the Project emissions analysis and mitigation (RPDEIR Section 2.2);
- Updated Wildfire analysis as to off-site impacts of the Project and impacts of the Project's off-site components (RPDEIR Section 2.3).
- Updated Partial Cumulative Impacts analysis related to Biological Resources, Climate Change, and Wildfire (RPDEIR Section 3.0).

In connection with the RPDEIR, the County considered whether any other portions of the Centennial EIR required recirculation as a result of the need to address new significant information pursuant to CEQA Guidelines section 15088.5, which describes the circumstances that require recirculation of an EIR. As used in that section, the term "information" can include "changes in the project or environmental setting as well as additional data or other information." (CEQA Guidelines Section 15088.5, subd. (a).) Importantly, "[n]ew information added to an EIR is not '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." (*Id.*) In other words, new information does not, by itself, require recirculation of an EIR. Recirculation is only required if new information is "significant" because, for example, it results in a disclosure showing that a new significant environmental impact would result from the project or that there would be a substantial increase in the severity of a previously disclosed environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance. (*Id.*)

As summarized in Section 1.6 of the RPDEIR, the County considered all of the environmental topics previously disclosed in the Centennial EIR and determined that, with the exception of

Climate Change, Wildfire, and Biological Resources, none of the changes to the Project, the environmental setting, or other data or information rose to the level of "significant" as defined in CEQA Guidelines Section 15088.5. This is due to the fact that neither the Project nor the Project site have substantially changed since circulation of the Draft EIR in 2017 (see Appendix B, *Evaluation of Baseline Biological Surveys Conducted for the Centennial Specific Plan Project*). The only changes proposed to the Project are the addition of local microgrid electrical distribution systems as a permitted land use and the dedication of the majority of the Cement Road Realignment as a public road. Neither change would introduce new disturbance areas or result in a new or substantially increased environmental impact, as discussed in RPDEIR pp. 1-4 through 1-6. For each resource area, Section 1.6 of the RPDEIR also confirms that the relevant conditions of the Project site have not changed since the Draft EIR was circulated for public review (RPDEIR pp. 1-10 through 1-21; see also Response A.4-3, below). Because the only "significant new information" added to the Centennial EIR relates to Climate Change, Wildfire, and potential impacts to Crotch's bumble bee, the RPDEIR is limited to revising only those portions of the Centennial EIR, and only those revised portions of the Centennial EIR were recirculated for public review and comment in accordance with Subdivision (c) of State CEQA Guidelines Section 15088.5. As CEQA Guidelines Section 15088.5, subdivision (f)(2) permits, the County requested reviewers to limit the scope of their comments to that material which is addressed within the text of the revised portions and the appendices included in the RPDEIR. The County also requested that reviewers limit their comments to the RPDEIR. Pursuant to CEQA Guidelines Section 15088.5, subdivision (f)(2), the County is only required to respond to (i) comments received during the initial Draft EIR circulation period (from May 18, 2017, to August 16, 2017) that relate to chapters or portions of the EIR that were not revised and recirculated, and (ii) to comments received during the recirculation period that relate to the chapters or portions of the earlier EIR that were revised and recirculated.

The County's responses to all comments received during the initial Draft EIR circulation period, as well as additional comments received prior to the County's 2019 certification of the Centennial EIR, are included in the Centennial Final EIR.[1] The County's responses to comments received in 2026 on the RPDEIR are included in this Section 2.0. Only comments that specifically address the analysis in the RPDEIR require a detailed response. However, the County has made a good faith effort to address all comments made on the RPDEIR, including those that go beyond the scope of what relates to the chapters or portions of the earlier EIR that were revised and recirculated, and they will be included in the administrative record and provided to County decisionmakers for their review and consideration.

2.2.2 PUBLIC REVIEW PERIOD COMMENT LETTERS

This section includes the comments received on the public review RPDEIR from public agencies, organizations, and individuals. Refer to Appendix C, *Public Review RPDEIR Comment Letters*.

[1] The Centennial Final EIR is provided online at: https://planning.lacounty.gov/wp-content/uploads/2026/02/centennial_FEIR_combined_11-27-18.pdf.

Response to Comment Letter A.1

California Highway Patrol
B. Purvis, Captain
Commander, Newhall Area
June 24, 2026

Response A.1-1

The comment expresses concern regarding traffic congestion, additional enforcement demands, increased incidents requiring emergency response during construction as well as traffic impacts on local freeways and the transport of hazardous materials. The California Highway Patrol (CHP) anticipates the Project would result in a negative impact on transportation and suggests traffic control measures to mitigate such impacts. The CHP requests that project construction and operations are conducted diligently, are monitored, and comply with vehicle safety rules pursuant to the California Vehicle Code.

The purpose of the RPDEIR is to address only the limited portions of the Centennial EIR that require further analysis, specifically biological resources, climate change, and wildfire. Please refer to Topical Response A, *Scope of Recirculated Partial Draft EIR,* for additional information about the scope of the RPDEIR. Regarding traffic congestion and impacts on local freeways, project impacts, regulatory compliance, and mitigation measures are addressed in Section 5.10, *Traffic, Access, and Circulation*, Thresholds 10-1 and 10-2 on pp. 5.10-48 through 5.10-139 of the Draft EIR. Regarding additional enforcement demands, Section 5.16, *Fire and Law Enforcement Services,* Threshold 16-2 on pp. 5.16-20 through 5.16-25 of the Draft EIR, analyzes the Project's impacts and the potential increase in demand for fire and law enforcement services on the Project site. Furthermore, Threshold 10-5 on pp. 5.10-140 through 5.10-141 of the Draft EIR analyzes emergency access and response during construction and operation. Lastly, regarding the transport of hazardous materials, Section 5.3, *Hazards and Fire Safety,* Thresholds 3-1 through 3-3 on pp. 5.3-15 through 5.3-19 of the Draft EIR addresses the potential for handling hazardous materials.

Response A.1-2

The comment provides contact information and does not address the content or adequacy of the RPDEIR under CEQA or the State CEQA Guidelines; no additional response is required.

Response to Comment Letter A.2

Department of Water Resources
Zack Ramsey, Manager
State Water Project Right-of-Way Management Section
Division of Operations and Maintenance
July 7, 2026

Response A.2-1

This comment provides introductory remarks and is included in the administrative record. The comment does not address the content or adequacy of the RPDEIR under CEQA or the State CEQA Guidelines. Therefore, no further response is required.

Response A.2-2

The comment provides a summary of the project description for the Centennial Specific Plan Project, states that the Project site is directly adjacent to and proposes crossing the California Aqueduct, which is part of the State Water Project (SWP), and details the four specific locations where the Centennial Specific Plan Project proposes to cross the California Aqueduct. The comment further notes that the Department of Water Resources (DWR) possesses statutory rights to protect the California Aqueduct from development associated with the proposed parcels due to the presence of DWR facilities in the vicinity of the project area.

The County acknowledges the DWR's jurisdiction and statutory rights regarding the protection of the California Aqueduct. The Project's proximity to and planned crossings of the California Aqueduct have been considered in the Project's infrastructure and development planning. The RPDEIR only addressed portions of the Centennial EIR, specifically biological resources, climate change and wildfire. Please refer to Topical Response A, *Scope of Recirculated Partial Draft EIR*, for additional information about the scope of the RPDEIR. All other environmental topic areas, such as utilities and service systems are addressed in Section 5.20, *Dry Utilities,* of the Draft EIR. Furthermore, the California Aqueduct and relevant crossings were addressed in full in Section 5.18, *Water Resources*, on pp. 5.18-17 through 5.18-70 of the Draft EIR.

Response A.2-3

The comment states that while the Centennial EIR previously included a drainage study and addressed DWR's previous concerns regarding the West Branch of the SWP, a detailed drainage study is still required to evaluate potential impacts. The comment further notes that the proposed Project may divert drainage runoff into the California Aqueduct, potentially impacting the SWP right-of-way, and requests a hydrology analysis comparing pre- and post-development peak stormwater runoff rates to ensure compliance with 23 CCR Section 625.6.

The Project's comprehensive drainage and stormwater management design directly addresses the Department of Water Resources' concerns regarding potential impacts to the SWP right-of-way and the California Aqueduct. The Project's drainage design is detailed in the Centennial Master Plan Hydrology (Draft EIR Appendix 5.2-A), which was reviewed and approved by the Los Angeles County Department of Public Works Hydrology Unit on May 10, 2017 (signed by VILONG TRUONG, RCE No. C82680).

The *Master Plan Hydrology* includes a complete drainage study with detailed hydrologic and hydraulic analysis across the entire project watershed. The study establishes baseline conditions for a 42,000-acre contributing watershed with 39,000 acres tributary to California Aqueduct crossings. Peak discharge rates at nine critical cross-sections (XS1 through XS9) were calculated for multiple design storm frequencies, including 2-, 5-, 10-, 25-, and 50-year events. The analysis demonstrates that the Project's drainage design achieves significant reductions in peak stormwater runoff at all cross-sections. Specifically, the 50-year design storm peak discharge comparisons show the following results:

- Oso Creek at NODE 467E (XS1, 19,282 acres tributary) is reduced from 2,446.4 cubic feet per second (cfs) to 2,346.3 cfs (–4.10%);
- Oso Creek at NODE 712D (XS2, 7,376 acres tributary) is reduced from 404.4 cfs to 358.3 cfs (–11.40%);
- Tentrock Creek (XS3, 1,754 acres tributary) is reduced from 9,884.5 cfs to 9,433.1 cfs (–4.60%);
- the 292nd Street Aqueduct Crossing (XS4, 2,022 acres tributary) is reduced from 9,143.2 cfs to 2,484.6 cfs (–72.80%);
- East Tributary 3 (XS5, 1,297 acres tributary) is reduced from 468.3 cfs to 42.7 cfs (–90.90%);
- East Tributary 2 (XS6, 875 acres tributary) is reduced from 697.4 cfs to 197.5 cfs (–71.70%);
- the 286th Street Aqueduct Crossing (XS7, 4,198 acres tributary) is reduced from 4,547.9 cfs to 2,104.9 cfs (–53.70%);
- Gorman Tributary (XS8, 232 acres tributary) shows no increase at 331.2 cfs (0.00%); and
- East Tributary 2 (XS9, 996 acres tributary) is reduced from 680.9 cfs to 315.8 cfs (–53.60%).

These reductions demonstrate that post-development peak runoff rates are maintained at or below existing levels at all project boundaries, as required by the County's development standards.

The Project specifically protects the California Aqueduct and SWP infrastructure through engineered design features. The Master Plan Hydrology identifies two critical Aqueduct crossing points, demonstrating substantial reductions in peak discharge rates: the 286th

Street Crossing (XS7) achieves a 53.70% reduction in peak discharge (from 4,547.9 cfs to 2,104.9 cfs), and the 292nd Street Crossing (XS4) achieves a 72.80% reduction (from 9,143.2 cfs to 2,484.6 cfs). These significant reductions in peak discharge rates at Aqueduct crossings directly reduce potential scour, erosion, and infrastructure impacts to the SWP right-of-way. Additionally, the Project incorporates specific mitigation measures to further protect water conveyance facilities.

The Project's drainage and stormwater management system incorporates six categories of mitigation measures to address drainage impacts and protect the SWP. First, drop and grade control structures are engineered to control velocity, reduce scour potential, and preserve riparian vegetation in drainage channels. Second, engineered channels with drop structures and pools lined with riprap protection manage channel erosion and sediment transport. Third, infiltration, retention, and detention basins regulate discharge rates and provide water quality treatment. Fourth, debris basins prevent sediment and debris transport in bulked flows during high-runoff events. Fifth, active sediment management techniques including erosion control measures, sediment control structures, and natural sediment movement facilitation are incorporated throughout the drainage system. Sixth, stormwater quality measures ensure compliance with Low Impact Development (LID) standards, include regional detention and retention basins, and incorporate best management practices.

The Project's stormwater management system is designed in compliance with the LA County LID Standards Manual and addresses all hydromodification requirements. The system includes twenty-six regional extended detention and retention basins (Basins 0–25) with a total capacity of 2,266.0 acre-feet and a total footprint of 294 acres. The Project's LID retention volume requirement is 207.5 acre-feet total. Individual basin retention depths range from 2 to 6 feet, with drainage characteristics that provide basin drawdown times ranging from 42 to 98 hours based on infiltration rates of 0.11 to 1.72 inches per hour. The hydromodification analysis demonstrates that the Project meets all regulatory requirements under 23 CCR Section 625.6 through comprehensive evaluation for multiple design storm recurrence intervals (2-, 5-, 10-, 25-, and 50-year events). This analysis ensures that there is no increase in peak discharge, runoff volume, flow depth, width, or velocity in water conveyance facilities leaving the Project site. The study also includes sediment transport capacity analysis demonstrating channel stability under post-development conditions.

The *Master Plan Hydrology* provides the detailed drainage study and pre-development and post-development runoff analysis that the DWR requested. The study was prepared in compliance with all applicable standards and was approved by the Los Angeles County Department of Public Works, the local water agency responsible for flood control and drainage management in the project area. The Project's drainage design ensures that peak stormwater runoff rates at all locations—including critical California Aqueduct crossings—are reduced compared to existing conditions, thereby reducing potential impacts to the State Water Project right-of-way and facilities. The comprehensive stormwater management system achieves full compliance with 23 CCR Section 625.6 and all applicable LA County and state stormwater quality standards.

Response A.2-4

The comment states that the Project will require Encroachment Permits (EP) from the DWR pursuant to 23 CCR Section 605 for any activities that may pose a threat to the physical integrity of the SWP or interfere with DWR's rights regarding access, inspection, repair, or maintenance. The comment further outlines specific scenarios requiring these permits, such as encroachments into the right-of-way, modifications to soil cover over pipelines, or discharging developed runoff into the right-of-way, and provides resources for initiating this process.

The County acknowledges the regulatory requirements for EP as set forth by the DWR. If approved, the Project would be required to comply with all applicable State and federal regulatory requirements, including the requirement to obtain an EP.

Response A.2-5

The comment provides contact information and does not address the content or adequacy of the RPDEIR under CEQA or the State CEQA Guidelines. As such, no additional response is required.

Response to Comment Letter A.3

California Highway Patrol
B. Purvis, Captain
Commander, Newhall Area
July 24, 2026

Response A.3-1

The comment is identical to the comment provided in the California Highway Patrol's letter of June 24, 2026, which is addressed above in Response to Comment Letter A.1.

Response A.3-2

The comment provides contact information and does not address the content or adequacy of the RPDEIR under CEQA or the State CEQA Guidelines; no additional response is required.

Response to Comment Letter A.4

California Department of Fish and Wildlife, South Coast Region
Victoria Tang, Environmental Program Manager
August 7, 2026

Response A.4-1

The comment provides introductory remarks regarding CDFW's role as a trustee and responsible agency under CEQA, summarizes the Project and biological setting, identifies special-status species and vegetation communities previously identified as occurring or potentially occurring on the Project site, and summarizes CDFW's prior involvement in review of the Project. The comment does not raise a specific issue regarding the content or adequacy of the RPDEIR. The comment is noted and will be included in the administrative record. No further response is required.

Response A.4-2

The comment states that development of the Project may increase human-wildlife conflicts and identifies potential effects associated with increased human presence adjacent to wildlife habitat, including wildlife displacement, vehicle collisions, unauthorized take, altered wildlife movement, domestic animal interactions, trash and other attractants, and increased demand for wildlife management. The comment recommends preparation of a Wildlife Conflict Management Plan and establishment of a permanent funding mechanism to implement the plan.

As CDFW's comment letter recognizes, the RPDEIR addresses deficiencies identified by the Court of Appeal in *Center For Biological Diversity et al. v. County of Los Angeles et al.* (2025) 112 Cal.App.5th 317 ("Opinion"). The Court of Appeal did not identify any inadequacy in the Centennial EIR's analysis of Biological Resources and expressly upheld the Centennial EIR's discussion of impacts on wildlife and native plant life. Since circulation of the Draft EIR in 2017, there is no new significant information that either the Project or the Project site have changed in a manner that would substantially increase a significant impact associated with human-wildlife conflict or result in a new significant impact or substantially more severe environmental impact than previously analyzed. The revised Biological Resources analysis in the RPDEIR is limited to consideration of potential impacts to Crotch's bumble bee (*Bombus crotchii*) and associated mitigation. This limited update was included because, following certification of the Centennial EIR in 2019, a subsequent habitat assessment confirmed that the Project site contains potentially suitable foraging and nesting habitat for the species. The County therefore updated the analysis to add species-specific mitigation to ensure that potential impacts would be avoided or reduced in accordance with current regulatory requirements.

The comment concerning general human-wildlife conflicts does not identify an inadequacy in the RPDEIR's analysis of Crotch's bumble bee and has already been responded to in Volume I of the Consolidated 2019 Final EIR (SCH No. 2004031072), which includes the

County's responses to CDFW's comments dated July 17, 2017, on the Draft EIR. Please also refer to Topical Response A, *Scope of Recirculated Partial Draft EIR*.

Although CEQA does not require the County to respond to comments on the RPDEIR that do not relate to the chapters or portions of the Centennial EIR that were revised and recirculated, the following information related to human-wildlife conflict is provided for informational purposes. As analyzed in detail in Section 5.7 of the Draft EIR, the Project will implement mitigation measures to minimize human-wildlife conflict. For example, MM 7-3 requires the Project Applicant/Developer to retain a qualified Biologist to ensure that incidental construction impacts on special-status wildlife species are avoided or minimized; MM7-6 requires the Project Applicant/Developer to remove dead cattle that are found or reported within 1,000 feet of the boundary of a residential or commercial development and all surfaced on new antennae and phone/utility towers must be designed and operated with anti-perching devices in conformance with Avian Power Line Interaction Committee standards; MM7-14 requires the SR-138 underpass to flare out on both sides of the highway to a 150-foot width in the Project open space to allow local wildlife to safely pass between open space areas on the opposite side of the highway, along with a 50-foot buffer along Cement Plant Road and the Aqueduct; MM7-15 requires waste and recycling receptacles that discourage foraging by wildlife species adapted to urban environments in all common areas and educational outreach by the Project homeowner's association regarding the importance of not feeding wildlife, trash containing food and micro trash that could potentially attract condors should not be accessible to wildlife, the necessity of keeping the ground free of fallen fruit from trees, and instructions about not leaving pet food outside; and MM7-17 requires the Project Applicant/Developer to implement a public awareness program in an effort to restrict public access to riparian and open space areas to designated trails and to prevent unleashed domestic animals from entering these areas (including signs and fencing) and further requires that all dogs be leashed in open space areas, all dogs and cats be neutered or spayed, and all be microchipped.

The comment will be included in the administrative record and provided to County decisionmakers for their consideration. No revisions to the RPDEIR are required in response to this comment.

Response A.4-3

The comment notes that certain biological surveys supporting the Centennial EIR were conducted between 1999 and 2015 and states that reliance on older surveys could result in the failure to detect special-status species present at the time of Project implementation.

To determine whether baseline survey updates were required to reflect existing conditions, the County considered the extent of previous surveys conducted on the project site, completed a focused literature review, and in light of project site conditions, species requirements, and other relevant factors, determined that survey updates were not necessary. As described in more detail below, based on this review and current site conditions, the County concluded site conditions and the habitat supporting the special-

status species evaluated in the Centennial EIR have not materially changed in a manner that would invalidate the previous analysis:

- **Plants:** Focused special-status plant surveys were conducted throughout the Project site over multiple years. Paul Pruett & Associates conducted focused surveys in 1999 and 2000; Impact Sciences conducted surveys for common and special-status plants from March through September 2001; Vollmar Consulting conducted focused spring and summer surveys in 2003 and 2004; Natural Resource Consultants conducted focused special-status plant surveys and grassland sampling and distribution studies between 2006 and 2008; and BonTerra Psomas conducted focused spring and summer special-status plant surveys in 2015. Vegetation mapping was conducted by BonTerra Consulting in 2005 and 2007 and updated by BonTerra Psomas in 2015. The methods and results of these efforts are summarized in Section 5.7, *Biological Resources*, of the Draft EIR and documented in the supporting biological technical reports cited in Appendix 5.7-B of the Draft EIR. Plant species documented during the surveys are identified in the plant compendium included as Appendix 5.7-A of the Draft EIR. The Project site has remained undeveloped and unchanged since completion of the most recent surveys in 2015, with no grading, vegetation removal, or alteration to soils or hydrology that would affect plant community composition or species presence to any measurable degree. Because special-status plant occurrences are primarily driven by habitat characteristics and disturbance history, both of which remain unchanged, the prior survey results continue to accurately characterize plant resources on the site.
- **Waters and Wetlands:** Jurisdictional waters and wetland features within the Project site were evaluated through a series of delineation and functional-assessment efforts. Impact Sciences conducted a preliminary jurisdictional delineation of the Project site from April through August 2001 using then-applicable U.S. Army Corps of Engineers and California Department of Fish and Game protocols (Impact Sciences 2002b). Glenn Lukos Associates subsequently delineated Phase One areas in October and November 2005, delineated previously unassessed Phase One and Future Phase areas and conducted a functional assessment from May through July 2006, and updated the jurisdictional delineation and functional assessment in 2008 (GLA 2005c, 2006c, 2009a, and 2009b). BonTerra Psomas completed the most recent update in June 2015, including newly added areas and a California Rapid Assessment Method functional assessment (BonTerra Psomas 2015a). The supporting reports are included in Appendix 5.7-B of the Draft EIR. The site has not experienced hydrologic modification, grading, or land use changes that would alter drainage patterns or aquatic feature extent to any measurable degree. As a result, the location, extent, and character of jurisdictional waters are expected to remain unchanged. Accordingly, the County concluded previously completed delineations remain valid for purposes of environmental analysis.
- **Invertebrates:** Focused and reconnaissance-level surveys for invertebrates were conducted between 2001 and 2007 in areas supporting potentially suitable habitat. In March 2001, Impact Sciences sampled several vernal or seasonal pools and cattle

ponds for fairy shrimp (Impact Sciences 2001c). Glenn Lukos Associates subsequently conducted wet-season protocol surveys at two potentially suitable locations during the 2004–2005 wet season; assessed fairy-shrimp habitat throughout the proposed impact area west of the California Aqueduct and within the 262-acre portion of the Project site south of SR-138 in October 2005; conducted wet- and dry-season protocol surveys at potentially suitable locations within those areas from October 2005 through April 2006; and conducted dry-season protocol surveys at eight seasonal depressions from September 2006 through January 2007 (GLA 2005a, 2005b, 2006a, 2006d, and 2007). Guy Bruyea conducted focused surveys for special-status butterflies and their larval and adult host plants within potentially suitable areas of the Project site from May through August 2001 and across larger portions of the site from May through August 2003 and May through September 2004 (Bruyea Biological Consulting 2001, 2003, and 2004). The supporting survey reports are included in Appendix 5.7-B of the Draft EIR. These surveys included multiple wet- and dry-season efforts conducted under the applicable protocols and during appropriate seasonal conditions. Invertebrate occurrence is strongly dependent on the presence of suitable host plants, soils, hydrologic conditions, and microhabitat features, all of which remain unchanged on the Project site. The site has not experienced grading, hydrologic alteration, or vegetation modification since completion of these surveys. Accordingly, prior invertebrate survey results remain representative of existing conditions, and additional focused surveys are not warranted.

- **Herpetofauna:** Surveys and habitat assessments for amphibians and reptiles were conducted between 1999 and 2006 within areas of potentially suitable habitat across the Project site. General biological surveys conducted by Paul Pruett & Associates in 1999 and 2000 included searches for amphibians and reptiles in potentially suitable areas (Impact Sciences 2003). In 2001, Impact Sciences conducted U.S. Fish and Wildlife Service protocol-level surveys for California red-legged frog and concurrent targeted surveys for two-striped garter snake and western pond turtle in potentially suitable areas of the site (Impact Sciences 2001a). Impact Sciences also conducted searches for special-status amphibians and reptiles in potentially suitable areas in 2003 and focused western spadefoot surveys in 2004 (Impact Sciences 2003 and 2004b). BonTerra Consulting conducted focused western spadefoot surveys during spring and summer 2005 and focused protocol surveys for arroyo toad, California red-legged frog, and Tehachapi slender salamander from February through June 2006 within potentially suitable areas west of the California Aqueduct and within the 262-acre portion of the Project site south of SR-138 (BonTerra Consulting 2005). The supporting survey reports are included in Appendix 5.7-B of the Draft EIR.

  No changes to aquatic features, upland habitat, or cover resources have occurred since those surveys were completed. Given the absence of new breeding habitat, hydrologic modification, or increased disturbance, conditions for herpetofauna remain consistent with those evaluated previously. Therefore, existing survey data are considered sufficient to assess potential impacts to amphibians and reptiles, and repeated surveys are not required.

In addition, western spadefoot was conservatively considered during prior analyses based on generalized habitat associations. Current species distribution and range information for western spadefoot indicates that the Project site is outside the species' known extant geographic range. Western spadefoot is generally associated with grasslands, vernal pool complexes, and foothill habitats of the Central Valley and coastal and inland regions of southern California, with no documented occurrences in the western Antelope Valley region (Jennings and Hayes 1994; Stebbins and McGinnis 2012; CDFW 2025). This refined understanding reflects a precautionary approach taken during earlier evaluations and does not change the conclusions of the biological analysis contained in the Centennial EIR. Accordingly, western spadefoot is not expected to occur on the Project site, and focused surveys for this species are not warranted.

- **Birds and Mammals:** Surveys and habitat assessments for mammals and special-status birds were conducted between 1999 and 2015 based on habitat suitability, site reconnaissance, and species-specific survey requirements. General wildlife surveys were conducted in potentially suitable areas of the Project site in 1999 and 2000, followed by small-mammal trapping in representative habitat areas in 2001, primarily east of the California Aqueduct in 2003, and at additional locations across the Project site in 2005 (Impact Sciences 2003; Crawford 2003; Ecological Sciences 2005). Focused surveys for Tehachapi pocket mouse were conducted within the Phase One areas from May through July 2006 (Ecological Sciences 2006). Focused burrowing owl surveys were conducted in potentially suitable areas in 2003 and in selected portions of the Project site and mitigation lands in April 2006 (Impact Sciences 2003; NRC 2006c).

  Focused bird surveys also included California spotted owl surveys from March through July 2006; least Bell's vireo and southwestern willow flycatcher surveys from April through July 2006 and again from April through July 2008; mountain plover surveys from February through April 2010; Swainson's hawk surveys from March through July 2013; and tricolored blackbird surveys from March through July 2015, where potentially suitable habitat was present (BonTerra Consulting 2006a, 2006b, 2008, and 2010; BonTerra Psomas 2013 and 2015c). California condor records, habitat conditions, and potential impacts were evaluated in 2007 and updated in July 2015 (Peter Bloom 2009; BonTerra Psomas 2015d). The supporting survey and assessment reports are included in Appendix 5.7-B of the Draft EIR.

  Recent observations of California condor consist exclusively of aerial flyovers, as well as additional records of wintering burrowing owl, bald eagle, and migrating Swainson's hawk flyovers in the Project vicinity (Cornell Lab of Ornithology 2026). These records reflect continued regional use patterns and do not indicate nesting, breeding, or habitat use within the Project site. Additional records for the species mentioned above do not change the conclusions of the Centennial EIR, as they do not reflect new habitat-based potential or site-specific use.

  The Project site has remained in the same general condition since completion of these surveys, with no changes to vegetation cover, soil conditions, forage resources,

potential nesting and roosting features, or connections with surrounding habitat. Because the site conditions used to evaluate whether special-status mammals and birds could occur remain materially unchanged, the existing survey data continue to characterize the site adequately. Therefore, additional focused surveys for special status mammals and bird species are not warranted.

- **Wildlife Movement:** Wildlife movement and habitat connectivity were previously evaluated in the Centennial EIR based on site context, surrounding land uses, and the presence of natural movement pathways, with a focus on wide-ranging species such as mountain lion, and the Opinion expressly determined that the Centennial EIR adequately analyzed wildlife connectivity impacts. Since completion of the prior wildlife movement studies, the Project site has not experienced development, fencing, or other physical changes that would alter movement pathways or connectivity functions. Review of current site conditions does not indicate changes to corridor function or linkage value. Based on analysis of the potential for wildlife movement through the Project site, the conclusions of the Centennial EIR remain valid, and additional wildlife movement studies are not warranted.

In addition, the comment does not account for MM 7-2, which requires preconstruction surveys prior to ground-disturbing activities and are intended to identify species that may be present at the time an individual phase or area of the Project is implemented. Accordingly, the Project will rely on updated surveys to determine species' presence at the time of construction.

The revised Biological Resources analysis in the RPDEIR addresses only one species: Crotch's bumble bee. A Crotch's Bumble Bee Habitat Assessment field survey was conducted in 2024 to evaluate current habitat conditions and the potential for the species to occur on the Project site (Refer to Appendix C of the RPDEIR). In addition, RPDEIR Mitigation Measure BIO-1 requires a habitat assessment and preconstruction surveys for Crotch's bumble bee in suitable habitat prior to ground-disturbing activities occurring during the colony active period, using methodology accepted by CDFW. MM BIO-1 further requires consultation with CDFW regarding potential take and compliance with the requirements of any incidental take permit issued by CDFW where avoidance of known nests is not feasible. Accordingly, with respect to Crotch's bumble bee, the substantive requirements of CDFW's proposed Mitigation Measures #3 and #4 are already addressed by MM BIO-1. Together, these provisions included in the RPDEIR ensure that Crotch's bumble bee presence is evaluated prior to ground-disturbing activities and that any applicable take authorization requirements have been adequately addressed.

The County acknowledges CDFW's comments regarding applicable take prohibitions and authorization requirements. The Project Applicant will be required to comply with applicable State and federal statutory requirements governing take. For the reasons discussed above, including the continued current relevance of surveys used in the Centennial EIR, the comment does not warrant addition of the broadly applicable special-status species survey or incidental take permit mitigation measures proposed by CDFW, does not identify

new significant information requiring recirculation of any other portion of the Centennial EIR, and does not result in changes or revisions that modify the findings of the RPDEIR.

Response A.4-4

The comment recommends that mitigation lands be protected and managed in perpetuity and that appropriate mechanisms be established to address topics such as access, land dedication, monitoring and management, illegal dumping, water pollution, human intrusion, and long-term funding.

The proposed Centennial EIR mitigation program already provides for the permanent preservation and long-term management of Project mitigation lands, as described in Centennial EIR Section 4.5.7. The Project's Mitigation Preserve is required to be preserved and managed in perpetuity for biological resource values, with restrictions on public access, motorized recreational use, development, and other activities that could adversely affect preserved habitat. Management of mitigation lands is governed by applicable management plans, and the Tejon Ranch Conservancy is responsible for long-term management obligations associated with conserved lands. The EIR also identifies mechanisms for funding long-term management and monitoring. (See 2019 Final EIR, Section 4.5.7, *Natural Resources/Open Space*, and Mitigation Measures 7-10, 7-11, 7-12, and 7-23.)

The comment does not identify a specific inadequacy in the RPDEIR's Crotch's bumble bee-specific analysis or mitigation or introduce new significant information. Please also refer to Topical Response A, *Scope of Recirculated Partial Draft EIR*. The comment will be included in the administrative record and provided to County decisionmakers for their consideration. No revisions to the RPDEIR are required in response to this comment.

Response A.4-5

The comment states that CDFW generally does not support translocation or transplantation as the primary mitigation strategy for unavoidable impacts to endangered, rare, or threatened plants and animals and indicates that permanent preservation and management of suitable habitat may provide a more effective long-term conservation strategy.

The County acknowledges CDFW's general recommendation regarding translocation and transplantation of special-status plants and wildlife. The mitigation program established by the Centennial EIR and supplemented by the RPDEIR does not rely on translocation, transplantation, or salvage as the primary mitigation strategy for special-status plants or wildlife. Rather, the mitigation program emphasizes avoidance and minimization of direct impacts, permanent preservation, and long-term management of suitable habitat, protection of retained populations and habitat features, and construction-period measures intended to avoid injury or mortality. Where salvage, propagation, or relocation is permitted, it functions as one component of this broader mitigation program and is subject to species-specific requirements, qualified-biologist oversight, and applicable agency review or authorization.

For special-status plants, MM 7-1 requires preservation and long-term management of existing and newly detected populations and mitigation at a 2:1 ratio. Seed collection and propagation are components of a broader Special Status Plant Species Restoration Plan subject to County and CDFW approval, rather than substitutes for permanent preservation (MM 7-1). The wildlife mitigation measures similarly emphasize preconstruction surveys, avoidance buffers, seasonal restrictions, construction monitoring, and habitat preservation. Where relocation is permitted, it is a limited measure to reduce direct injury or mortality and must comply with applicable plans, permits, and agency requirements.

MM BIO-1 applies the same approach to Crotch's bumble bee by requiring preconstruction surveys, biological monitoring, avoidance buffers around known nests, and measures to minimize impacts during vegetation removal and ground disturbance. Habitat loss is addressed through permanent preservation, restoration, and long-term management. Relocation or removal of a nest is not the primary mitigation strategy and may occur only with CDFW authorization and compliance with applicable take requirements (RPDEIR, pp. 2.1-4 through 2.1-6).

CDFW's recommendation is consistent with the Project's mitigation approach. The comment does not identify a measure that relies primarily on translocation or transplantation or demonstrate an inadequacy in the RPDEIR's mitigation for Crotch's bumble bee. The broader analysis and mitigation of impacts to special-status plants and wildlife were not revised or recirculated as part of the RPDEIR. Please refer to Topical Response A, *Scope of Recirculated Partial Draft EIR*.

Accordingly, no additional analysis or revision to the RPDEIR is required in response to this comment. The comments will be included in the administrative record and provided to County decisionmakers for their consideration.

Response A.4-6

The comment provides information regarding CDFW Scientific Collecting Permit requirements applicable to the capture, temporary possession, handling, monitoring, and relocation of wildlife in connection with Project-related activities.

The County acknowledges the information provided by CDFW regarding Scientific Collecting Permit requirements. The Project Applicant and biological personnel conducting Project-related activities would be required to comply with all applicable State and federal laws, regulations, and permit requirements, including applicable CDFW authorization requirements.

The comment does not identify an inadequacy in the environmental analysis contained in the RPDEIR. The comment will be included in the administrative record and provided to County decisionmakers for their consideration. No revisions to the RPDEIR are required in response to this comment.

Response A.4-7

The comment describes CDFW and California Fish and Game Commission policies regarding wetlands and recommends avoidance and minimization of impacts to wetland resources; mitigation for unavoidable losses of wetland acreage, functions, or habitat values; and retention of wetlands and watercourses with setbacks sufficient to protect riparian and aquatic functions.

The comment concerns wetlands, watercourses, and associated biological resource impacts generally and does not identify an inadequacy in the RPDEIR's revised analysis of Crotch's bumble bee or associated mitigation. Please refer to Topical Response A, *Scope of Recirculated Partial Draft EIR*. The Court of Appeal did not identify any inadequacy in the Centennial EIR's analysis of Biological Resources related to wetlands. The revised Biological Resources analysis in the RPDEIR is limited to consideration of potential impacts to Crotch's bumble bee (*Bombus crotchii*) and associated mitigation.

Notwithstanding the foregoing, the following information is provided regarding how the Centennial EIR addresses CDFW's concerns through Mitigation Measures 7-11 and 7-12. The Project avoids development in wetlands to the extent feasible and requires implementation of mitigation measures to assure there will be no net loss of either wetland habitat values or acreage. Specifically, MM7-11 requires the Project Applicant/Developer to create, enhance, and/or restore all impacted riparian and wetland vegetation types that are not considered jurisdictional by permitting resource agencies at a 1:1 ratio and MM7-12 requires the Project Applicant/Developer to obtain appropriate regulatory agency permits and/or agreements and comply with all mitigation measures specified in the permit and/or agreement prior to any fill or alteration to drainage tributaries, wetlands, and/or riparian vegetation. MM7-12 further requires the Project Applicant/Developer to create, enhance, and/or restore acreage to ensure that net habitat values are at least equal to those that will eventually be lost from Project implementation. Based on wetland functional assessments conducted for the Project, Project implementation with mitigation would result in a functional gain of 327.5 Functional Capacity Units, thereby ensuring a net increase in functionality in the post-project condition. In summary, implementation of the proposed jurisdictional resource mitigation will result in a net gain in the measurable functional capacity and therefore, the habitat values, of the on-site and off-site drainages and other aquatic features.

The comment will be included in the administrative record and provided to County decisionmakers for their consideration. No revisions to the RPDEIR are required in response to this comment.

Response A.4-8

The comment describes the California Fish and Game Commission's policy regarding protection of the quantity and quality of State waters and recommends avoidance of practices and structures that use excessive amounts of water and minimization of impacts that negatively affect water quality.

The comment does not address the revised Crotch's bumble bee analysis or identify an inadequacy in another portion of the RPDEIR that was revised and recirculated. Please refer to Topical Response A, *Scope of Recirculated Partial Draft EIR*. Please also refer to Response A.4-7. The Court of Appeal did not identify any inadequacy in the Centennial EIR's analysis of Biological Resources. The revised Biological Resources analysis in the RPDEIR is limited to consideration of potential impacts to Crotch's bumble bee (*Bombus crotchii*) and associated mitigation.

Notwithstanding the foregoing, the following information regarding analysis of water impacts in the Centennial EIR is provided for informational purposes. As described in section 5.18 of the Centennial EIR, the Project has been designed to minimize water demand. For example, as discussed in the Draft EIR (SCH No. 2004031072) Chapter 4.0, *Project Description,* page 4-52, the Project will include an on-site recycled water facility that will supply approximately 40% of the Project's total water demands. Further, to ensure the Project's water demand remains low, the Project will use low-flow indoor fixtures, irrigation equipment with electronic sensors, water-wise landscaping, water budget-based rates, full metering of all water use, and monitoring, enforcement, and response measures as required. The Project will also maximize opportunities for groundwater recharge and groundwater banking.

Furthermore, as discussed in Section 5.4, *Water Quality,* of the Draft EIR to protect water quality, the Project has been designed to meet or exceed the County's MS4 permit and low impact development requirements and to avoid impacts to surface water and groundwater beneficial uses designated by the Lahontan and Los Angeles Regional Water Quality Control Boards. The Project would also comply with the State Water Resources Control Board General Construction Permit requirements to ensure construction-related water quality impacts are avoided and minimized through implementation of a Stormwater Pollution Prevention Plan (SWPPP). Compliance with Mitigation Measures 4-1 and 4-2 would further ensure water quality impacts are avoided and minimized by formally requiring that all Low Impact Development (LID) performance standards, integrated pest management, and landscaping BMP requirements are reconfirmed in detailed drainage and landscape plans submitted to the County during each Project tract map review and approval process.

Accordingly, no additional analysis or revision to the RPDEIR is required in response to this comment. The comments will be included in the administrative record and provided to County decisionmakers for their consideration.

Response A.4-9

The comment recommends use of native plants for Project landscaping and restoration; avoidance of non-native invasive species; use of native vegetation occurring within or adjacent to the Project site; planting of native trees and understory vegetation beneficial to birds; retention of standing dead or dying trees where feasible; and use of vegetation having high insect and pollinator value.

The comment provides general recommendations concerning Project landscaping, vegetation, and habitat values and does not identify an inadequacy in the RPDEIR's revised analysis of Crotch's bumble bee or associated mitigation. Please refer to Topical Response A, *Scope of Recirculated Partial Draft EIR*. The County acknowledges CDFW's recommendations regarding landscaping and restoration. The Court of Appeal did not identify any inadequacy in the Centennial EIR's analysis of Biological Resources. The revised Biological Resources analysis in the RPDEIR is limited to consideration of potential impacts to Crotch's bumble bee (*Bombus crotchii*) and associated mitigation.

Notwithstanding the foregoing, the following information regarding mitigation measures that address native plants in the Centennial EIR is provided for informational purposes. As described in Section 5.7, *Biological Resources*, of the Draft EIR, MM 7-13 requires preparation of a Landscaping Plan subject to review and approval by the County Biologist, requires use of non-invasive species adapted to site conditions, prohibits planting and retail sale of identified invasive plant species within the Project site, and encourages planting of local native species typical of native vegetation occurring within 10 miles of the Project site. MM 7-13 also requires that homeowners be provided with the prohibited invasive-species list and a list of local native plants. Accordingly, the Project already includes measures addressing the principal concerns raised by CDFW regarding invasive species and use of local native vegetation. The comment does not warrant additional mitigation or revisions to the RPDEIR.

Response A.4-10

The comment recommends that the Project's environmental document and Mitigation Monitoring and Reporting Program incorporate the mitigation measures recommended by CDFW in its comment letter and notes that CDFW has provided a draft mitigation monitoring and reporting plan to assist the County.

Please refer to Responses A.4-2 through A.4-9 and Topical Response A, *Scope of Recirculated Partial Draft EIR*.

The Final Recirculated EIR includes a Mitigation Monitoring and Reporting Program to ensure that adopted mitigation measures and regulatory requirements are reported and monitored for compliance. The comment does not result in changes or revisions that modify the findings of the RPDEIR.

Response A.4-11

The comment requests that special-status species and natural communities detected during Project surveys be reported to the California Natural Diversity Database (CNDDB) and that information regarding special-status native plant populations and sensitive natural communities be submitted to CDFW's Vegetation Classification and Mapping Program, as applicable.

The County acknowledges CDFW's recommendations regarding submission of biological data. Biological data collected in connection with Project activities will be submitted to applicable resource agency databases in accordance with applicable laws, regulations, permits, and adopted mitigation measures. The comment does not identify an inadequacy in the environmental analysis contained in the RPDEIR, and no revisions to the RPDEIR are required in response to this comment.

Response A.4-12

The comment states that the Project would have an impact on fish and/or wildlife and provides information regarding CDFW filing fees payable upon filing of the Notice of Determination.

The County acknowledges the information provided by CDFW regarding applicable filing fees. Required CDFW filing fees will be addressed by the Lead Agency in accordance with applicable requirements at the time the Notice of Determination is filed. The comment does not address the content or adequacy of the RPDEIR under CEQA or the State CEQA Guidelines, and no revisions to the RPDEIR are required in response to this comment.

Response A.4-13

The comment provides concluding remarks, requests an opportunity to review and comment on the County's responses to CDFW's comments, and requests notification of forthcoming Project hearing dates.

The County acknowledges CDFW's review of and comments on the RPDEIR. CDFW's requests regarding receipt of the County's proposed responses and notification of future Project hearings are noted. The County will comply with applicable CEQA procedural and noticing requirements. The comment does not identify an inadequacy in the environmental analysis contained in the RPDEIR, and no revisions to the RPDEIR are required in response to this comment.

Response to Comment Letter A.5

California Highway Patrol
R. E. Alcaraz, Lieutenant
Commander, Fort Tejon Area
August 10, 2026

Response A.5-1

The comment expresses concern regarding traffic congestion, additional enforcement demands, increased incidents requiring emergency response during construction as well as traffic impacts on local freeways and the transport of hazardous materials. The California Highway Patrol (CHP) anticipates the Project would result in a negative impact on transportation and suggests traffic control measures to mitigate such impacts. The CHP requests that project construction and operations are conducted diligently, are monitored, and comply with vehicle safety rules pursuant to the California Vehicle Code. CHP's concerns and requests for diligence are acknowledged.

The purpose of the RPDEIR is to address only the limited portions of the Centennial EIR that required further analysis, specifically biological resources, climate change, and wildfire. Please refer to Topical Response A, *Scope of Recirculated Partial Draft EIR,* for additional information about the scope of the RPDEIR. Regarding traffic congestion and impacts on local freeways, project impacts, regulatory compliance, and mitigation measures are addressed in Section 5.10, *Traffic, Access, and Circulation*, Thresholds 10-1 and 10-2 on pp. 5.10-48 through 5.10-139 of the Draft EIR. Regarding additional enforcement demands, Section 5.16, *Fire and Law Enforcement Services,* Threshold 16-2 on pp. 5.16-20 through 5.16-25 of the Draft EIR, analyzes the Project's impacts and potential increase in demand for fire and law enforcement services on the Project site. Furthermore, Threshold 10-5 on pp. 5.10-140 through 5.10-141 of the Draft EIR analyzes emergency access and response during construction and operation. Lastly, regarding the transport of hazardous materials, Section 5.3, *Hazards and Fire Safety,* Thresholds 3-1 through 3-3 on pp. 5.3-15 through 5.3-19 of the Draft EIR addresses potential for handling hazardous materials.

Response A.5-2

The comment provides contact information and does not address the content or adequacy of the RPDEIR under CEQA or the State CEQA Guidelines; no additional response is required.

Response to Comment Letter B.1

Lozeau Drury LLP
Richard Drury
July 1, 2026

Response B.1-1

The comment is submitted on behalf of the Supporters Alliance for Environmental Responsibility (SAFER) and states that the RPDEIR fails as an informational document and does not impose all feasible mitigation measures to reduce the Project's impacts. The comment requests that the Department of Regional Planning revise and recirculate the RPDEIR to address these perceived shortcomings prior to project approval.

The County acknowledges the comments submitted by SAFER on behalf of its members; however, SAFER's letter does not contain any specific comments on the RPDEIR's analysis, nor any evidence to support its purported concerns. The RPDEIR, which is limited to revisions regarding biological resources, climate change, and wildfire, provides a thorough and reasoned analysis of the Project's potential environmental impacts in accordance with the State CEQA Guidelines. This focused revision, when integrated with the non-recirculated portions of the Centennial EIR, constitutes a comprehensive record that appropriately addresses the Project's environmental impacts in a manner consistent with law. The RPDEIR and Centennial EIR identify all feasible mitigation measures where warranted.

Response to Comment Letter B.2

Center for Biological Diversity
Seth Alston, Associate Attorney
Urban Wildlands Program
July 2, 2026

Response B.2-1

This comment requests confirmation regarding the RPDEIR public review periods. The comment also states that the Notice of Availability (NOA) included on the County's Planning website has not been updated to reflect the NOA submitted to State Clearinghouse.

The County responded directly to this comment on July 6, 2026, confirming the public comment period was extended, consistent with the recirculation of the document, and the County's website was updated to reflect the updated NOA. The comment does not address the content or adequacy of the RPRDEIR under CEQA or the State CEQA Guidelines, and therefore, no additional response is required.

Response to Comment Letter B.3

Southern California Edison
Stevi N Luevano
Third Party Environmental Reviews
Major Projects Division, EHSQ
July 7, 2026

Response B.3-1

This comment provides introductory remarks and is included in the administrative record. The comment did not provide new, substantial evidence with respect to the disposition of significant environmental impacts evaluated in the RPDEIR. Therefore, no further response is required.

Response B.3-2

The comment provides a summary of Southern California Edison's (SCE's) electrical facility, and states that the Project is subject to CPUC General Order 131-D, which governs electric facilities ranging from 50 kilovolts (kV) to over 200 kV.

The County acknowledges the information provided by SCE regarding their role in maintaining electrical transmission and distribution facilities within the County of Los Angeles, and the regulatory requirements associated with the CPUC General Order 131-D. The Project would be required to comply with all applicable State and federal regulatory requirements.

The Draft EIR Chapter 4.0, *Project Description,* includes on and off-site dry utilities, including electrical facilities (see Draft EIR, pp. 4-63 through 4-67), and the physical environmental impacts of off-site features, including SCE facilities, were addressed as part of the Project analyzed in the Draft EIR, 2019 Final EIR, Consolidated 2019 Final EIR, and RPDEIR. Refer to Section 1.2 of this Final Recirculated EIR for a catalog of prior environmental documents availability for review. Further, the RPDEIR includes a detailed analysis of wildfire impacts associated with proposed off-site electrical facilities, including transmission lines. (See RPDEIR pp. 2.3-23 through 2.3-28, pp. 2.3-49 through 2.3-50, pp. 2.3-76 through 2.3-77, p. 2.3-112, p.2.3-114, p. 2.3-117, p. 2.3-119 through 2.3-120, pp. 2.3-150 through 2.3-152, pp. 3-5 through 3-6, and p. 3-9.) The comment does not warrant changes or revisions that modify the findings of the RPDEIR.

Response B.3-3

The comment states that SCE appreciates the opportunity to provide comments on the Centennial Specific Plan Project and expresses a desire to collaborate with the County of Los Angeles moving forward. The comment does not address the content or adequacy of the RPDEIR under CEQA or the State CEQA Guidelines; no additional response is required.

Response to Comment Letter B.4

Center for Biological Diversity/California Native Plant Society
Tiffany Yap, D. Env/PhD, Senior Scientist
John Buse, Senior Counsel
Nick Jensen, PhD, Conservation Program Director
Michelle N. Black
August 13, 2026

Response B.4-1

The comment provides introductory remarks, summarizes the history of the litigation surrounding the Centennial Specific Plan Project, and states the organizations' concerns regarding biological resources, wildfire risk, greenhouse gas emissions, and the scope of the RPDEIR. The comment also asserts that unrevised sections of the Centennial EIR must be updated to account for new information regarding dry utilities, water resources, and climate change, and requests a complete revision and recirculation of the EIR.

The County acknowledges the introductory remarks and the background regarding the Project's litigation history. As discussed in Topical Response A, *Scope of Recirculated Partial Draft EIR*, the RPDEIR addressed the deficiencies the Court of Appeal identified in *Center For Biological Diversity et al. v. County of Los Angeles et al.* (2025) 112 Cal.App.5th 317 ("Opinion"). Specifically, the RPDEIR updated and provided additional analysis for the Centennial EIR's discussion of Climate Change and Wildfire. While the Opinion did not find any inadequacies in the Centennial EIR's analysis of Biological Resources, the RPDEIR also includes partial revision to the Biological Resources analysis to address potentially significant impacts to Crotch's bumble bee and mitigation to reduce those potential impacts to less than significant and portions of the analysis of Cumulative Impacts related to Climate Change, Wildfire, and Biological Resources. As summarized in Section 1.6 of the Recirculated Partial Draft EIR, the County considered all of the environmental topics previously disclosed in the Centennial EIR and determined that, with the exception of Climate Change, Wildfire, and Biological Resources, none of the changes to the Project, the environmental setting, or other data or information rose to the level of "significant" as defined in CEQA Guidelines Section 15088.5. In general, this is due to the fact that neither the Project nor the Project site have substantially changed since circulation of the Draft EIR in 2017. The specific rationale for this conclusion for each individual resource area is discussed in Section 1.6 of the Recirculated Partial Draft EIR.

Regarding the comment's statement regarding concern about the Project's impacts to sensitive and special-status species and habitats, please refer to Responses B.4-3 through B.4-12.

Regarding the comment's statements regarding concern that the RPDEIR's wildfire risk and greenhouse gas emissions impact analysis remain deficient, please refer to Responses B.4-13 through B.4-32.

The comment states that the RPDEIR should include new sections on dry utilities and water supply due to what the commenters characterize as "significant new information" relating to statewide data center growth, general snowpack and water supply data and modeling. As discussed in Topical Response A, *Scope of Recirculated Partial Draft EIR*, "[n]ew information added to an EIR is not '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." (CEQA Guidelines Section 15088.5, subd. (a).) New information does not, by itself, trigger the need to recirculate an EIR. Recirculation is only required if new information is "significant" because, for example, it results in a disclosure showing that a new significant environmental impact would result from the project or that there would be a substantial increase in the severity of a previously disclosed environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance. (*Id.*) The commenters' broad statements regarding statewide trends are not "significant" as that term is used in CEQA because they do not demonstrate that the Project would result in a substantial adverse environmental effect. Therefore, these comments do not introduce significant new information requiring recirculation under CEQA Guidelines Section 15088.5.

Similarly, the comment's generalized commentary on climate change projections does not reveal a new significant impact that would occur as a result of Project development.

Regarding the comment's statement that the RPDEIR should include a new section on climate change in light of new information on climate change and climate modeling, the RPDEIR does include a comprehensive revised and recirculated section on climate change (RPDEIR Section 2.2). Pursuant to CEQA Guidelines Section 15064.4, this climate change analysis is subject to a good faith and reasonableness standard. Under CEQA, there is no requirement to continuously update modeling to reflect new or evolving methodologies or to conduct exhaustive analyses. For these reasons, the comment does not identify a deficiency in the RPDEIR requiring further revision or recirculation. The comment will be included in the administrative record and provided to County decisionmakers for their consideration.

Response B.4-2

This comment describes the organizational background, membership, and missions of the Center for Biological Diversity and the California Native Plant Society. The comment does not address the content or adequacy of the RPDEIR under CEQA or the State CEQA Guidelines. Therefore, no further response is required.

Response B.4-3

This comment addresses the revised Biological Resources analysis concerning Crotch's bumble bee and associated mitigation contained in Section 2.1 of the RPDEIR.

The comment provides information regarding the ecology, conservation status, and population status of Crotch's bumble bee and states that the RPDEIR does not adequately

establish the environmental baseline for the species. The comment cites historical observations on the Project site and more recent observations at Quail Lake and asserts that protocol-level surveys should have been conducted. The comment further states that the Project should avoid and minimize impacts before relying on mitigation, questions the adequacy and location of the Preserve System, identifies the potential for take of individual bumble bees, and asserts that the Project would disrupt habitat connectivity between areas east and west of the Project site.

The RPDEIR conservatively identifies all natural vegetated portions of the Project Area as potentially suitable Crotch's bumble bee habitat. It further quantifies impacts to approximately 6,918 acres of potentially suitable foraging and nesting habitat and concludes that impacts to Crotch's bumble bee would be significant before mitigation (RPDEIR, pp. 2.1-3 through 2.1-4.) The observations at Quail Lake identified by the commenter are consistent with the RPDEIR's conservative assumption that the species may occur in suitable habitat in the Project Area and vicinity.

The RPDEIR's updated analysis of impacts to Crotch's bumble bee adequately establishes an existing conditions baseline based on existing site-specific biological information, previous biological surveys, current scientific literature and agency guidance, and a Crotch's Bumble Bee Habitat Assessment prepared in 2024 to evaluate current habitat conditions, the potential for the species to occur, and potential Project-related effects (RPDEIR, pp. 2.1-1 and 2.1-3; Appendix C). Because the RPDEIR already treats all natural vegetated portions of the Project Area as potentially suitable habitat, contemporary protocol-level surveys would not identify a greater geographic extent of potentially occupied habitat than that already considered in the impact analysis. Although such surveys could theoretically document foraging individuals or active nests present during a particular survey period, bumble bee nests move sites each year.[2] As a result, conducting protocol level surveys would have only provided a temporal snapshot, would not establish the locations of nests or individual bumble bees at the time future ground-disturbing activities occur, and therefore would not have altered the County's characterization of the environmental baseline in a way that would have affected the RPDEIR's impact analysis. Similarly, non-detection during protocol-level surveys would not establish that the species could not subsequently use otherwise suitable habitat. As such, the RPDEIR established an adequate existing conditions baseline supported by substantial evidence and evaluated potential impacts to the species against that baseline. Under CEQA Guidelines Section 15151, disagreement among experts, such as regarding appropriate baseline surveys, is permitted as long as the County has made a good-faith effort at disclosure.

The County has also considered CDFW's August 3, 2026, guidance regarding conservation of candidate bumble bee species (CDFW 2026). The guidance expressly states that it is non-regulatory and that its practical application must be based on project- and site-specific circumstances. With respect to surveys, the guidance explains that the appropriate number and type of surveys may vary depending on the project and site. It recognizes that where

[2] See, e.g. California Department of Fish and Wildlife. 2023. Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species.

candidate bumble bees are known or assumed to be present, preconstruction surveys may be appropriate, while protocol-level surveys may be more appropriate under other circumstances.

The approach adopted in the RPDEIR is consistent with this project-specific framework. MM BIO-1 requires a qualified biologist to conduct a habitat assessment before ground-disturbing activities scheduled during the colony active period to identify suitable foraging and nesting habitat. The assessment must be conducted during every year in which such activities are scheduled to occur or if vegetation is allowed to be reestablished. The qualified biologist must then conduct preconstruction surveys within suitable habitat using methodology approved by CDFW. Regardless of the survey results, a qualified biologist must be present during ground-disturbing activities occurring during the colony active period. These recurring requirements allow conditions to be evaluated closer in time to actual construction activities rather than relying solely on a single project-wide survey conducted years before individual areas are disturbed.

Contrary to the assertions in the comment, the RPDEIR does not rely solely on compensatory habitat preservation without providing for avoidance and minimization. If Crotch's bumble bee is detected, MM BIO-1 prohibits ground-disturbing activities within 100 feet of a known nest location, or within a different distance determined appropriate by a qualified biologist based on topographic features or the distribution of nectar resources. The buffer must remain in place for the duration of the nesting colony active period unless the nest is determined to be inactive or is relocated or removed with CDFW authorization. MM BIO-1 also requires grubbing to be minimized to the extent feasible and, where grubbing is necessary, requires measures addressing season, cutting height, time of day, and equipment speed. Construction vehicle speeds are also limited to 15 miles per hour (RPDEIR, pp. 2.1-5 through 2.1-6). Thus, MM BIO-1 distinguishes between suitable habitat in which the species may occur and confirmed detections or known nest locations, requiring additional avoidance and minimization measures where nests are identified.

MM BIO-1 separately addresses the potential for take. If Crotch's bumble bee remains a candidate species or is listed as threatened or endangered under CESA and avoidance of known nests is determined not to be feasible, the Project Applicant must consult with CDFW regarding the potential for Project activities to result in take. The Project Applicant must also comply with all avoidance, minimization, and compensatory mitigation requirements imposed through any incidental take permit issued by CDFW. MM BIO-1 therefore does not authorize take or assume that active nests occur throughout all suitable habitats. It requires avoidance of known nests where feasible and compliance with applicable take-authorization requirements where avoidance is not feasible.

The comment also questions reliance on the Project's Preserve System because the preserved lands provide mitigation for other biological impacts. As explained on page 2.1-4 of the RPDEIR (as corrected in Section 3.0 of this Final Recirculated EIR), the Mitigation Preserve Program includes a 43,079-acre preserve system consisting of approximately 3,866 acres of unimpacted or Significant Ecological Area lands on site and approximately 39,213 acres in off-site areas, including lands on Tejon Ranch (Consolidated 2019 Final EIR, Section

4.0, pp. 4-129, 4-164 through 4-166, and 4-194). The Preserve System encompasses the major habitat types affected by the Project, as described below, and would provide greater than a 6:1 preservation-to-impact ratio. In addition, the applicable habitat-based mitigation measures require preservation and long-term management of comparable, high-quality habitat at a minimum 2:1 ratio.

Preserve selection included vegetation mapping and analysis of plant-community composition to identify lands that closely matched the habitats affected by the Project. The location and biological characteristics of these lands are documented in Appendix 5.7-C, *Mitigation Preserve Review*, of the Draft EIR. Exhibit 1 depicts the Preserve System in relation to the Project boundary and surrounding Tejon Ranch conservation lands, and Exhibits 2a through 2h depict the individual preserve areas. Table 4 identifies approximately 14,375 acres of grasslands within the on-site and off-site mitigation lands. As revised in the 2019 Final EIR to add Off-Site Preserve Area 7, the Mitigation Preserve includes approximately 14,908 acres of grasslands (Consolidated 2019 Final EIR, Section 4.0, pp. 4-169 and 4-194; MM 7-10, Table A). Field descriptions document extensive wildflower fields in multiple preserve areas, including phacelia and lupines, providing potential Crotch's bumble bee foraging resources. The preliminary assessment further indicates that the preserve lands evaluated support higher-quality habitat with less intensive grazing effects than the corresponding impact areas (Draft EIR Appendix 5.7-C). The preservation of 14,908 acres of grassland/wildflower fields vegetation as well as several other vegetation types provides greater than a 2:1 preservation-to-impact ratio of potentially suitable Crotch's bumble bee habitat.

A recent CNDDB review also identified a documented Crotch's bumble bee occurrence within Off-Site Preserve Area 4, demonstrating use of a portion of the Preserve System (CDFW 2026, Element Occurrence No. 440). Together, the habitat comparisons, documented floral resources, and species occurrence support the suitability of the preserve lands to compensate for impacts to Crotch's bumble bee habitat. Permanent protection and long-term management of these resources benefit the species even where the same lands also mitigate impacts to other biological resources.

As summarized in CDFW's August 3, 2026, guidance regarding conservation of candidate bumble bee species, Crotch's bumble bee is a member of the *Cullumanobombus* subgenus, which is predominantly associated with grasslands in North America, and the species has been documented using open grasslands, shrublands, chaparral, desert margins including Joshua tree and creosote scrub, and semi-urban settings. The species has also been observed on a wide variety of plants in the Fabaceae, Apocynaceae, Asteraceae, Lamiaceae, Hydrophyllaceae, Plantaginaceae, Onagraceae, Papaveraceae, Polygonaceae, and Boraginaceae families.[3] These findings in the Mitigation Preserve Review therefore support the value of the Preserve System for Crotch's bumble bee and the habitat-based mitigation approach described in the RPDEIR (Draft EIR Appendix 5.7-C, p. C-10 and pp. C-13 through C-17).

[3] CDFW, 2026.

The fact that preserved habitat provides benefits for multiple species and biological resources does not prevent that habitat from also mitigating impacts to Crotch's bumble bee where it provides the relevant habitat functions. The RPDEIR conservatively evaluates impacts based on suitable habitat rather than confirmed occupancy and applies the same habitat-based approach in evaluating the conservation value of the Preserve System. Mitigation Measure MM 7-10 requires permanent preservation and long-term management of grasslands, including associated wildflower fields; Mitigation Measure MM 7-11 requires preservation, creation, enhancement, or restoration of oak woodland and other sensitive vegetation types; and Mitigation Measure MM 7-12 requires streambed and wetland habitat creation and enhancement. Collectively, these measures protect and manage habitat that provides potential Crotch's bumble bee resources. Mitigation Measure MM 7-10 also requires implementation of the Ranch-wide Management Plan, including grazing-management practices, invasive-plant mapping, and targeted weed removal to maintain the biological value of preserved habitat.

The comment raises concerns regarding the potential for Project development to disrupt movement of Crotch's bumble bee between remaining habitat areas east and west of the Project site. The County acknowledges that habitat connectivity is relevant to the species' access to foraging resources, dispersal, and persistence. Habitat connectivity depends on the distribution and quality of available resources and the characteristics of intervening land uses.

The preserve configuration places protected habitat adjacent to the Project and within the surrounding undeveloped landscape. The On-Site Northern Preserve Area adjoins Off-Site Preserve Area 2, which includes upper Oso Canyon and habitat extending toward the Tehachapi Mountains. The On-Site Southern Preserve Area adjoins Off-Site Preserve Area 1, which contains extensive wildflower fields and a riparian drainage connecting with undeveloped lands toward the Liebre Mountains. This configuration provides a basis to expect that opportunities for Crotch's bumble bee movement would remain between the on-site preserves, adjoining off-site mitigation lands, and other surrounding undeveloped habitat following Project buildout (Draft EIR Appendix 5.7-C, pp. C-1 through C-2, C-14 through C-16, and Exhibit 1).

CDFW's August 3, 2026, guidance regarding conservation of candidate bumble bee species documents Crotch's bumble bee in semi-urban settings and identifies its use of a variety of native and non-native flowering plants (CDFW 2026). These observations indicate that developed areas are not necessarily unavailable to the species. Landscaped portions of the completed Project therefore may provide supplemental nectar and pollen resources where suitable flowering plants are present. The extent and duration of those resources would depend on the planting palette, seasonal flowering, and landscape management practices. While potential use of landscaped areas would not, by itself, be expected to maintain connectivity equivalent to existing natural habitat, it may contribute to the connectivity provided by the preserve configuration described above.

The RPDEIR does not rely on potential future use of landscaped areas to reduce its estimate of habitat impacts. It identifies approximately 6,918 acres of potentially suitable foraging

and nesting habitat that would be impacted and evaluates that loss as significant before mitigation. The analysis relies on the habitat-preservation and management requirements described on page 2.1-4 and the construction-related avoidance and minimization requirements of MM BIO-1. Potential supplemental foraging opportunities within the completed Project would therefore be additional to, and are not credited toward, the habitat mitigation described in the RPDEIR.

The RPDEIR adequately evaluates potential impacts to Crotch's bumble bee based on current habitat conditions and a conservative assumption of potential occurrence throughout suitable natural habitat. Implementation of MM BIO-1 and the applicable habitat-preservation and management requirements would reduce impacts to Crotch's bumble bee to less than significant. No revisions to the RPDEIR are required in response to this comment.

Response B.4-4

The comment cites provisions of CEQA and the State CEQA Guidelines concerning significant new information and changed circumstances and asserts that additional biological-resource analysis and recirculation are required. The comment claims that information regarding Significant Ecological Areas (SEAs), special-status species, and the biological effects of wildfire mitigation are grounds for revising and recirculating the Centennial EIR. As demonstrated below and in subsequent response to comments, this information does not constitute new significant information triggering recirculation.

The Court of Appeal did not identify any inadequacy in the Centennial EIR's analysis of Biological Resources. The revised Biological Resources analysis in the RPDEIR is limited to consideration of potential impacts to Crotch's bumble bee and associated mitigation. Please refer to Topical Response A, *Scope of Recirculated Partial Draft EIR*, for discussion of the scope of the revised environmental review and the County's consideration of whether other portions of the Centennial EIR require recirculation.

As explained in Topical Response A, *Scope of Recirculated Partial Draft EIR*, the County considered whether new information or changed circumstances would result in new significant or substantially more severe environmental impacts than previously analyzed. The comment's assertions regarding SEAs and special-status species implicate portions of the Biological Resources analysis that were not revised or recirculated. Those concerns are addressed in Responses B.4-5 through B.4-6 and B.4-8 through B.4-12.

The comment also raises concerns regarding potential biological effects of wildfire mitigation addressed in the RPDEIR. These concerns are addressed in Response B.4-7, including the relationship between vegetation-management activities, the Project impact boundary, and adjacent preserve areas. Accordingly, the response to those concerns considers their relationship to the revised wildfire analysis.

The comment will be included in the administrative record and provided to County decisionmakers for their consideration. Please refer to the responses identified above for discussion of the specific information and potential impacts cited by the commenter.

Response B.4-5

The comment states that the 2025 Significant Ecological Areas Study recommends expansion of the San Andreas Significant Ecological Area (SEA) to include Subarea 17c, which would encompass a greater portion of the Project site. The comment states that the proposed expansion reflects the area's ecological value, rare plant species richness, biological diversity, climate resilience, and importance for regional wildlife connectivity. The comment also describes the existing SEA criteria and proposed Criterion G addressing habitat connectivity. Based on the 2025 SEA Study, the comment asserts that significant new information demonstrates that the Project area is critical for regional connectivity and biodiversity and requests that the EIR analyze Project impacts to both existing and proposed SEAs. The comment does not identify an inadequacy in the RPDEIR's revised analysis of Crotch's bumble bee or associated mitigation. Please refer to Topical Response A, *Scope of Recirculated Partial Draft EIR*, and Response B.4-1 regarding the standards applicable to significant new information.

The County acknowledges the 2025 SEA Study and its recommendation to expand the San Andreas SEA. As background, SEAs are officially designated areas within LA County with important biological resources. The SEA Program objective is to conserve genetic and physical diversity within LA County by designating biological resource areas that are capable of sustaining themselves into the future. The County's SEA Ordinance establishes the permitting, design standards, and review process for development within SEAs, balancing preservation of the County's natural biodiversity with private property rights. The SEA Program, through the County's General Plan goals and policies, is intended to ensure that privately held lands within the SEAs retain the right of reasonable use, while avoiding activities and developments that are incompatible with the ability of SEAs to thrive in the long term. Published in May 2026, the 2025 SEA Study was conducted to inform the General Plan's Conservation and Natural Resources Element Update to comply with Senate Bill 1425 (Stern, 2022) and Assembly Bill 1889 (Friedman, 2024), which require local governments to improve access to open spaces, enhance wildlife connectivity, and support biodiversity by mitigating the impacts of human activities on natural habitats (Los Angeles County Department of Regional Planning 2026). The 2025 SEA Study informed proposed revisions to the SEA Policy Map, which provides the boundaries where the General Plan policies and zoning regulations will apply (Los Angeles County Department of Regional Planning 2026). Thus, the 2025 SEA Study and proposed Subarea 17c boundary are part of an ongoing County planning process. The proposed revisions to the SEA Policy Map remain in draft form, are undergoing public review, and must proceed through public hearings before they may be adopted. Accordingly, the recommended boundary does not alter the currently adopted SEA boundary or impose new SEA requirements on the Project at this time. For purposes of CEQA, the relevant question is whether the 2025 SEA Study includes "significant new information" requiring recirculation of the EIR because it demonstrates that the Project would cause a new significant environmental impact or a substantial increase in the severity of an impact previously analyzed (CEQA Guidelines Section 15088.5(a).). As explained below, the proposed boundary does not, by itself, demonstrate such an impact, nor is there any

information in the 2025 SEA Study that rises to the level of "significant new information" as that term is defined in CEQA.

First, although the proposed Subarea 17c boundary represents an updated regional planning recommendation, the ecological characteristics cited in support of that recommendation were already recognized and evaluated in the Centennial EIR. Specifically, the Centennial EIR described the San Andreas SEA, the mosaic of habitats along the San Andreas Fault Zone, and the area's role in the regional linkage between the San Gabriel and Tehachapi Mountains (Draft EIR, p. 5.7-8). The Draft EIR also recognized the Project site's location near the convergence of the Mojave Desert, San Gabriel Mountains, and Tehachapi foothills and the resulting diversity of vegetation communities (Draft EIR, pp. 5.7-14 and 5.7-31). Approximately 3,866 acres of the Project site within the adopted SEA 17 boundary would be preserved as potential on-site mitigation lands (Draft EIR, p. 5.7-172 and Exhibit 5.7-15; Consolidated 2019 Final EIR, Section 4.0, pp. 4-129, 4-130, and 4-165).

The biological values associated with the Project site and its proximity to the San Andreas SEA also influenced the Project's planning and design. The County and the Significant Ecological Area Technical Advisory Committee (SEATAC) reviewed and commented on the Project during its development, and the Project was modified in response to that review. Those modifications included reductions to the development footprint and retention of additional lands within the Project's Preserve System. The proposed SEA expansion therefore does not demonstrate that these biological values were overlooked during the Project's environmental review. Rather, the Project was designed through a site-specific review process that considered the same types of biological resources and regional conservation values now cited in support of the proposed SEA expansion.

Second, the record demonstrates that the Centennial EIR considered the biological resources and regional conservation considerations cited in support of the proposed SEA expansion. The Project's biological resources were evaluated by multiple consultants over many years, as summarized in the EIR's biological survey table (Draft EIR, p. 5.7-18 and Table 5.7-2, pp. 5.7-19 through 5.7-23). This work included preparation of the 2003 Centennial Biota Report for the Los Angeles County Department of Regional Planning and SEATAC (Draft EIR, p. 5.7-203 and Appendix 5.7-B, Gen-6), multiple rounds of focused special-status plant surveys, detailed vegetation mapping, grassland and wildflower studies (Draft EIR, pp. 5.7-19 through 5.7-26), and evaluation of regional and local wildlife movement (Draft EIR, pp. 5.7-49 through 5.7-59). The resulting analyses documented the biological resources present within the Project site (Draft EIR, pp. 5.7-31 through 5.7-144), evaluated the site's relationship to the San Andreas SEA and the regional landscape linkage (Draft EIR, p. 5.7-8 and pp. 5.7-49 through 5.7-59), and informed a Project design that preserves approximately 3,866 acres of on-site land within adopted SEA 17 as part of the broader Preserve System (Draft EIR, p. 5.7-172 and Exhibit 5.7-15; Consolidated 2019 Final EIR, Section 4.0, pp. 4-129 and 4-165).

Further, the Centennial EIR adequately analyzed the Project's impacts to special-status plants and identified appropriate mitigation, consistent with the 2025 SEA Study's regional characterization of Subarea 17c as supporting high rare plant species richness. Specifically,

the Centennial EIR identified the special-status plant species that would be affected by the Project, quantified impacts to documented populations, identified occurrences that would be retained in open space, and evaluated the significance of those impacts (Draft EIR, pp. 5.7-141 through 5.7-145 and Appendix 5.7-C, pp. C-10 through C-18). For example, MM 7-1 requires preservation and establishment of special-status plant populations within the Mitigation Preserve and requires focused surveys of mitigation lands to confirm compliance with the applicable mitigation ratios. The Mitigation Preserve Review also documents special-status plant populations and potentially suitable habitat within the Preserve System.

The Centennial EIR likewise adequately considered regional wildlife connectivity. The Draft EIR expressly recognized the regional linkage between the San Gabriel and Tehachapi Mountains and evaluated the Project site's contribution to wildlife movement at both regional and local scales. The comment quotes a statement from the Centennial EIR, which acknowledges that the Biological Resource Assessment "does not reference any studies that demonstrate that the Project site serves a significant element of the regional landscape linkage" (Draft EIR, p. 5.7-57). The comment suggests that the 2025 SEA Study includes new information not previously addressed in the Draft EIR. That is incorrect. Although the Centennial EIR noted that the prior SEA assessment did not cite studies demonstrating that the Project site itself constituted a significant element of the regional linkage (Draft EIR, p. 5.7-57), the Draft EIR separately recognized the regional linkage and evaluated the Project site's contribution to that linkage based on site-specific habitat conditions, topography, existing barriers, retained open space, and anticipated wildlife-movement patterns (Draft EIR, pp. 5.7-55 through 5.7-59 and 5.7-164 through 5.7-166). Indeed, the Court of Appeal expressly concluded that "the EIR adequately analyzed wildlife connectivity impacts." (RPDEIR Appendix A, Court of Appeal Opinion, p. 80.)

Further, the 2025 SEA Study does not provide the site-specific evidence that the comment attributes to it. The study recommends a broad regional planning boundary for Subarea 17c and describes the connectivity functions of that larger landscape, but the study does not demonstrate that the current Project impact area constitutes a critical element or bottleneck of the regional landscape linkage. Accordingly, the study's regional characterization does not establish that the Project would cause a new significant impact or a substantial increase in the severity of the wildlife-movement impacts previously analyzed in the Centennial EIR.

For clarity, Figure 1 in the comment correctly depicts the overall Project boundary, but it does not distinguish the Project's development impact boundary from Preserve System lands on-site. In the western portion of the Project site, the lands within the overall Project boundary that overlap the currently adopted San Andreas SEA are designated for preservation and are not part of the development impact area. The proposed Subarea 17c boundary would cover portions of the development impact area; however, the overlap between the proposed SEA and the overall Project boundary does not mean that all land within that boundary would be developed or affected. Project impacts were evaluated based on the development impact boundary, under the assumption that the on-site preserve lands would remain undeveloped and would be managed for their biological resource values as

part of the broader Preserve System (Draft EIR, p. 5.7-172; Appendix 5.7-C, Exhibits 1, 2a, and 2b).

For these reasons, the 2025 SEA Study and proposed SEA boundary do not constitute significant new information demonstrating that the Project would cause a new significant biological impact or a substantial increase in the severity of an impact previously analyzed in the Centennial EIR. The comment will be included in the administrative record and provided to County decisionmakers for their consideration. No revisions to the RPDEIR are required in response to this comment.

Response B.4-6

The comment disputes the RPDEIR's statement that biological conditions on the Project site have not materially changed since the Centennial EIR was prepared. The comment states that botanical surveys have not been conducted since 2015; identifies climate change, ongoing land uses, adjacent wildfire, and the regional spread of stinkwort and stinknet as circumstances that may have altered site conditions; and cites CDFW's 2018 plant-survey protocols in support of conducting updated botanical surveys. The comment further asserts that invasive plants may affect special-status species and increase wildfire risk and affect the accuracy of wildfire, land resources, biological resources, and cumulative impact analysis. To the extent the comment requests updated botanical surveys and renewed analysis of special-status plants and vegetation communities, it concerns portions of the Centennial EIR's Biological Resources analysis that were not revised or recirculated for public review. Please refer to Topical Response A, *Scope of Recirculated Partial Draft EIR*, and Response B.4-1 regarding the applicable significant new information standard.

The passage of time since the 2015 surveys, standing alone, does not demonstrate that biological conditions on the Project site have materially changed. The Project site remains undeveloped, and available records and recent field observations do not indicate material grading, vegetation removal, changes in land use, or alterations to soils or hydrology since completion of the biological surveys. During the August 30, 2024, Crotch's bumble bee habitat assessment, biologists familiar with the Project site traversed a substantial portion of the site and observed no notable changes in habitat conditions compared with those evaluated previously. Cattle grazing is a longstanding use of the site that was incorporated into the Centennial EIR's description and evaluation of existing conditions (Draft EIR, pp. 5.7-10 and 5.7-14), and Ranch records indicate that grazing intensity has remained consistent during the intervening years. Accordingly, the comment does not provide evidence demonstrating that the habitat conditions or disturbance history underlying the Centennial EIR's special-status plant analysis have materially changed or that the EIR's characterization of the existing conditions baseline is inadequate. Please also see Response A.4-3, which responds to comments from CDFW on the RPDEIR and contains additional details explaining how the County determined that site conditions and the habitat supporting the special-status species evaluated in the Centennial EIR have not materially changed.

The comment's distinction between a focused special-status plant survey and a floristic survey does not accurately characterize the Project's botanical-survey record. CDFW's

botanical survey protocols recommend floristic surveys that identify plants to the taxonomic level necessary to determine rarity and listing status (CDFW 2018[4], pp. 4–5). Although described as "focused," the Project's surveys were not restricted to a predetermined list of special-status species. All plant species observed during the 2015 survey were recorded in field notes, and plants that could not be identified in the field were collected for later identification. Plants were identified to the taxonomic level necessary to determine whether they qualified as special-status species. The Centennial EIR therefore relied on a multi-year botanical-survey program using accepted methods appropriate for identifying and evaluating special-status plant resources, rather than relying solely on searches for a limited list of previously known occurrences (Draft EIR, pp. 5.7-29 through 5.7-31 and Appendix 5.7-B).

The references cited in the comment regarding the regional spread of stinkwort and stinknet and observations at a broader geographic scale, but do not establish the presence, abundance, or distribution of either species within or in the vicinity of the Project site. The cited publications address broader distribution and invasion potential rather than documenting populations in the vicinity of or on the Project site. Brinkmann's stinkwort research examined study populations in northern California and San Diego County, while Melen et al. (2024) studied stinkwort populations in Santa Clara County. Hedrick and McDonald (2020) describe stinknet's spread in Southern California and summarize distribution at the County scale, but do not identify a population's location, abundance, or infestation extent within the Project vicinity. Thus, the studies support regional spread potential but do not establish that either species is established or widespread within or in the vicinity of the Project site. Nor does the comment demonstrate that either species has materially altered an identified special-status plant occurrence, vegetation community, or habitat condition analyzed in the Centennial EIR. Regional expansion of an invasive species does not by itself establish a new significant environmental effect or a substantial increase in the severity of an impact previously analyzed. An independent review of Consortium of California Herbaria and iNaturalist records conducted on October 23, 2026 likewise identified no documented occurrences of stinkwort or stinknet within the Project site or its vicinity (CCH2 Portal 2026; iNaturalist 2026[5]). Separately, Calflora's Potential Range Mapper, using the watershed-based potential-habitat layer shown in the maps, does not map the Project site within the potential range of either species (Calflora 2026a, 2026b[6]). In summary, though neither the database review nor the mapped potential range definitively establishes that either species are absent, the information reviewed also does not indicate that either species is established or widespread in the vicinity of the Project such that Project development could result in impacts related to the spread of either species.

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4 California Department of Fish and Wildlife (CDFW). 2018 (March 20). Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities.

5 CCH2 Portal. 2026. *Consortium of California Herbaria specimen database*. Accessed October 23, 2026; iNaturalist. 2026. Accessed October 23, 2026.

6 Calflora. 2026a. *Plant Range: Dittrichia graveolens* (stinkwort). Calflora. https://www.calflora.org/entry/dgrid.html?crn=8482. Accessed November 6, 2026; Calflora. 2026b. *Potential Range: Oncosiphon pilulifer* (stinknet). Calflora. https://www.calflora.org/entry/dgrid.html?crn=13639. Accessed November 6, 2026.

Furthermore, the Specific Plan includes detailed landscaping and design requirements that will ensure that the Project site is developed and maintained in a manner that will limit the spread of invasive species. The Project site will be developed with buildings, roads, sidewalks, paving, and landscaping that excludes invasive exotic species. The Specific Plan specifically excludes invasive exotic species from the regionally sensitive plant palette, favoring instead native and drought tolerant trees, grasses, and plants with low irrigation needs (Specific Plan, p. M-5.). Section 3.4.4 includes a prohibited plant list at Table 3-9 and acknowledges that any list of invasive detrimental plants is not entirely comprehensive because many non-native species, under favorable environmental conditions, can become invasive or detrimental. For this reason, the Specific Plan allows the community forester with approval from the County staff biologist to modify the prohibited plant list over time (Specific Plan, p. 3-50.). The Specific Plan Green Development Program Measures requires that the use of invasive plant species as specified in Section 3.4.4 be prohibited through adoption of community-wide requirements in the Master Owners' Associations and CC&Rs, to be implemented at the Final Map stage (Specific Plan, Table 2-A-1.) The Project also includes measures addressing the potential introduction and spread of invasive plants during Project implementation. Project Design Feature PDF 7-8 and MM 7-13 require preparation of a Landscaping Plan subject to review and approval by the County Biologist, require the use of non-invasive species adapted to site conditions, prohibit the planting and retail sale of identified invasive plant species within the Project site, and encourage the use of local native species typical of vegetation occurring within 10 miles of the Project site. MM 7-13 also requires that homeowners be provided with the prohibited invasive-species list and a list of local native plants. These requirements reduce the potential for Project landscaping to introduce or propagate invasive species within the development area or adjoining preserved habitat (Draft EIR, p. 5.7-167; PDF 7-8; MM 7-13). In addition, MM 7-10 requires management of the Mitigation Preserve in accordance with the Ranch-wide Management Plan, which incorporates weed-management practices, including invasive-plant mapping and targeted removal actions. These requirements address invasive plants within preserved habitat through ongoing management (MM 7-10; Ranch-wide Management Plan, Volume II, Sections 5.1 and 5.2).

Regarding the claim that potential occurrence of stinkwort or stinknet renders the revised wildfire analysis inadequate, protocol-level floristic surveys conducted for special-status plants are not a scientifically accepted methodology used to evaluate wildfire behavior or characterize wildfire fuels. Wildfire analysis instead evaluates characteristics relevant to fire behavior, including vegetation structure and fuel type, fuel loading and continuity, fuel moisture, topography, and weather and wind conditions. Although botanical information may help characterize vegetation communities, a complete species-level inventory is not required to determine the applicable fuel conditions. The RPDEIR's wildfire analysis accounts for the grassland and herbaceous fuels that predominate on and around the Project site and evaluates fire behavior under conservative, extreme fire-weather conditions. The possible presence of additional annual herbaceous species would not invalidate fuel model assumptions or require different fire-behavior modeling. The comment does not provide site-specific information demonstrating that stinkwort or stinknet occurs within the Project impact area at an abundance sufficient to materially change any fuel-model input or the

conclusions of the wildfire analysis (RPDEIR, Section 2.3 and Appendix G, Centennial Wildfire Safety Plan). Please refer also to Responses B.4-18 and B.5-11.

Accordingly, the information cited in the comment does not demonstrate a material change in on-site biological or wildfire-fuel conditions, a new significant environmental impact, or a substantial increase in the severity of an impact previously analyzed. It therefore does not establish a corresponding deficiency in the RPDEIR's impact analyses. The comment will be included in the administrative record and provided to County decisionmakers for their consideration. No revisions to the RPDEIR are required in response to this comment.

Response B.4-7

The comment states that the RPDEIR proposes new wildfire mitigation that includes removing more vegetation and habitat than previously analyzed, and claims that associated lawn mowing and vegetation removal and thinning within 200 feet of structures could have significant impacts on special-status and sensitive species. The comment further states that MM 7-21 from the Centennial EIR is evidence that expanded fuel modification requirements within the Project site could have a significant impact on special-status species because it prohibits vegetation management within the portion of Significant Ecological Area and mitigation preserve areas within or bordering the Project site and the County is currently considering amendments to the SEA program to expand the boundary of the SEA to include the Project site. The comment states that vegetation management should be developed and implemented in coordination and collaboration with CDFW and that prescribed fire and cultural burns should be considered as a mitigation strategy, in coordination with Tribes, fire practitioners, and CDFW.

The comment concerns portions of the Centennial EIR's Biological Resources analysis that were not revised or recirculated for public review. Please refer to Topical Response A, *Scope of Recirculated Partial Draft EIR*, and Response B.4-1 regarding the applicable significant new information standard.

The comment incorrectly characterizes the RPDEIR as proposing a new wildfire mitigation program that would remove substantially more vegetation and habitat than was disclosed and analyzed in the Centennial EIR. The fuel modification framework described in the RPDEIR is consistent with the fuel modification approach evaluated in the Centennial EIR and reflects established Los Angeles County Fire Department (LACoFD) requirements for wildfire protection.

First, the wildfire mitigation measure requiring preparation of Fuel Modification Plan imposes the same requirements in both the Centennial EIR and the RPDEIR. As provided in the Centennial EIR, MM 3-9 required:

> ***MM 3-9*** *The Project Applicant/Developer shall prepare a Fuel Modification Plan demonstrating compliance with the County Fire Code Title 32 and shall provide all residents and business owners with recorded Covenants, Conditions, and Restrictions*

> *(CC&Rs) or disclosure statements that identify the responsibilities for maintaining the fuel modification zone(s) on their property, as defined in the approved Fuel Modification Plan. The CC&Rs or disclosure statements prepared by the Project Applicant/Developer shall be submitted to the County to confirm that new property owners would be informed of their responsibilities for maintaining the fuel modification zone(s) on their property (Draft EIR, pp. 1-38 through 1-39 and 5.3-39.).*

The RPDEIR replaces MM 3-9 with MM WILD-2, which imposes the same requirements, as described below.

> ***MM WILD-2*** ***Fuel Modification Plan.*** *The Project Applicant/Developer shall prepare a Fuel Modification Plan demonstrating compliance with the LA County Fire Code Title 32 and shall provide all residents and business owners with recorded Covenants, Conditions, and Restrictions (CC&Rs) or disclosure statements that identify the responsibilities for maintaining the fuel modification zone(s) on their property, as defined in the approved Fuel Modification Plan. The CC&Rs or disclosure statements prepared by the Project Applicant/Developer shall be submitted to the County to confirm that new property owners would be informed of their responsibilities for maintaining the fuel modification zone(s) on their property. (RPDEIR, p. 2.3-158.)*

Next, the fuel modification framework described in the RPDEIR is consistent with the fuel modification approach evaluated in the Centennial EIR. As described in Section 4.0, *Project Description*, of the Centennial EIR, the default modification setback standard within a Very High Fire Hazard Severity Zone (VHFHSZ) is 200 feet from the closest structure; however, some flexibility is permitted where land characteristics do not warrant such large setback requirements. (Draft EIR, pp. 4-83, 5.3-31 to 5.3-32, and 5.3-36 to 5.3-37.) Fuel modification was described in the Centennial EIR as a three-zone system extending up to 200 feet from structures, where warranted by site-specific conditions and approved by LACoFD. Specifically:

- **Zone A** consists of a minimum 30-foot setback immediately adjacent to structures and is intended to provide protection from direct flame contact through irrigated, low-fuel landscaping, hardscape features, or other fire-resistant treatments.
- **Zone B** extends from the edge of Zone A to up to 100 feet from structures and functions as an irrigated transition zone where existing vegetation may be modified and replaced with fire- and drought-resistant landscaping, while allowing limited retained vegetation consistent with approved planting guidelines.
- **Zone C** extends from the edge of Zone B to as much as 200 feet from structures and consists primarily of native vegetation that is thinned and spaced to reduce fire

intensity and rate of spread before a wildfire reaches structures or the irrigated fuel modification zones. (Draft EIR, pp. 4-83 through 4-84 and 5.3-31 through 5.3-32.)

The RPDEIR does not introduce a new concept of vegetation management extending to 200 feet from structures, nor does it establish a blanket requirement that all vegetation within that distance will be removed. As previously disclosed in the Centennial EIR and described in the RPDEIR, fuel modification distances and treatment requirements are site-specific and are determined based on fire behavior characteristics, topography, fuel conditions, and LACoFD requirements. (See RPDEIR, pp. 2.3-55 to 2.3-58 [describing Zones A, B, and C and that widths will either total 100, 150, or 200 feet, depending on anticipated fire behavior].) As described above, fuel modification does not equate to wholesale clearing of habitat. In Zone C, the primary fuel treatment consists of thinning and spacing of vegetation to slow fire spread and reduce flame lengths while maintaining native vegetation cover.

The RPDEIR acknowledges revisions to Public Resources Code Section 4291 directing the Board of Forestry and Fire Protection to establish an ember-resistant defensible space within the first five feet surrounding a structure, referred to as Zone 0. (RPDEIR, p. 2.3-23.) On August 19, 2026, the California Board of Forestry and Fire Protection voted 8-0 to adopt the state's first "Zone 0" ember-resistant defensible space regulations, covering the first five feet around homes and other structures. As adopted, the rule would have: (a) restricted combustible materials within the full five-foot area, prohibiting combustible material located directly next to the structure and under the roof eaves, (b) allowed existing trees to remain, subject to maintenance; (c) allowed well-maintained, low, non-woody plants and lawns in the outer part of Zone 0; and (d) required a five-foot noncombustible section where fences or gates attach to a structure, bars new combustible fences or gates within five feet, and requires outbuildings in Zone 0 to be noncombustible. To be effective, the proposed Zone 0 regulations require review and approval by the California Office of Administrative Law. On September 8, 2026, the Board of Forestry and Fire Protection withdrew its proposed Zone 0 regulations from the Office of Administrative Law review.

If Zone 0 regulations are ultimately adopted in substantially the form proposed in August 2026, compliance with those standards will not substantially change the amount of vegetation and habitat removed from the amount previously analyzed in the Centennial EIR. The Zone 0 requirements will be applicable only to the first five feet around structures where fuel modification was already proposed. More importantly, the structures and immediately surrounding developed lots where Zone 0 would be implemented are located within the Project's previously analyzed development footprint. The requirement affects the landscaping and materials permitted immediately adjacent to future structures; it does not expand the development footprint, increase the amount of native habitat authorized for removal, or authorize vegetation clearing within the Project's Preserve System. These limited additional restrictions within the immediate perimeter of structures would not be expected to result in a new or increased significant impact on special-status and sensitive biological species.

The Centennial EIR already accounted for the biological effects of vegetation removal and fuel modification within the Project's 7,751-acre development footprint. As explained in the

Centennial EIR, the Project's fuel-modification zones are included within the development footprint and impact boundary depicted on Exhibits 5.7-11a and 5.7-11b of the Draft EIR. No Project-related fuel-modification activities, including vegetation clearing, may occur outside that boundary. The EIR therefore did not, as the comment asserts, assume that native vegetation or wildlife habitat would remain within areas designated for development and later subject to fuel modification (Consolidated 2019 Final EIR, Response to Comment F.8-64).

The Centennial EIR also includes measures preventing fuel-modification activities from extending into protected biological areas. MM 7-22 requires fuel-modification zones to remain within the Project impact boundary and prohibits their intrusion into the adjacent Significant Ecological Area. MM 7-21 further prohibits fuel-modification zones from encroaching into the adjacent Significant Ecological Area, and MM 7-1 restricts fuel modification in areas occupied by identified special-status plants. Accordingly, implementation of MM WILD-2 in accordance with current fire-safety requirements does not authorize additional disturbance within preserve lands or other areas outside the biological impact boundary analyzed in the Centennial EIR.

For the same reason, Zone 0 would not result in a new or substantially more severe effect on wildlife movement. The Centennial EIR's wildlife-movement analysis considered the conversion of the entire development footprint, rather than assuming that landscaping immediately adjacent to future structures would function as undisturbed movement habitat. The Project's movement functions are retained principally through its approximately 43,079-acre Preserve System, including preserve lands along the Project's northern, western, and southern boundaries and connections to adjoining undeveloped lands. Requiring noncombustible or ember-resistant treatment within five feet of structures inside the development footprint does not reduce those preserve areas, sever an additional movement pathway, or alter the EIR's conclusions concerning regional wildlife connectivity.

MM WILD-2 updates the Project's Fuel Modification Plan requirement to reflect current fire-safety regulations. It does not enlarge the area subject to development or fuel modification. The change in the treatment of the area immediately adjacent to structures therefore does not cause additional habitat loss beyond the disturbance already analyzed or result in a new or substantially more severe biological impact. Accordingly, the expected Zone 0 requirements do not require additional biological analysis, mitigation, or constitute significant new information or a substantial increase in the severity of impacts requiring recirculation of the RPDEIR.

Fuel Modification Zones (FMZs) associated with the Project would be developed, reviewed, and approved in coordination with the LACoFD to ensure compliance with applicable Los Angeles County Fire Code requirements and Project-specific fire protection objectives. The extent, treatment methods, and long-term maintenance requirements for FMZs would be subject to LACoFD review and approval as part of the Project's fire protection planning and implementation process. The Project would comply with all applicable laws regarding vegetation management and will coordinate with CDFW, where required. To the extent feasible and consistent with fire safety requirements, the Project would consider vegetation

management strategies such as prescribed fire and cultural burns as vegetation management strategies.

Regarding the County's consideration of expansions to its SEA boundaries, please refer to Response B.4-5.

Response B.4-8

The comment summarizes provisions of the California Endangered Species Act (CESA) concerning endangered, threatened, and candidate species; the prohibition against unauthorized take; CDFW's authority to authorize incidental take; and State policies concerning conservation and mitigation. The comment also cites the mandatory finding of significance in State CEQA Guidelines Section 15065(a)(1) and asserts that projects reducing the habitat, number, or range of a CESA-protected species necessarily have a significant environmental impact. Species-specific assertions concerning mountain lion, gray wolf, western burrowing owl, and western spadefoot are addressed in Responses B.4-9 through B.4-12.

The County acknowledges that CESA generally prohibits unauthorized take of wildlife species designated as endangered, threatened, or candidates for listing. CDFW may authorize incidental take under Fish and Game Code Section 2081 where the taking is incidental to an otherwise lawful activity and applicable minimization, and mitigation requirements are satisfied. Candidate species receive CESA take protection during the period of their candidacy. The provisions cited in the comment concerning bird nests, birds of prey, and migratory birds provide separate protections that also apply where relevant. The Project Applicant will be required to comply with all applicable State and federal requirements governing take, regardless of the conclusions reached under CEQA (Fish & Game Code Sections 86, 2080, 2081, and 2085).

The comment overstates the effect of CESA protection on the CEQA significance determination. State CEQA Guidelines Section 15065(a)(1) requires a mandatory finding of significance where substantial evidence shows that a project may, among other things, cause a wildlife population to fall below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of an endangered, rare, or threatened species. It does not provide that every project affecting some amount of habitat or potentially affecting an individual member of a protected species, necessarily results in a significant impact as a matter of law. The significance determination depends on the nature, extent, and context of the effect, including the species' use of the affected habitat and the effectiveness of adopted avoidance, minimization, and compensatory mitigation. Compliance with CESA's take prohibition and authorization requirements is related to, but legally distinct from, the lead agency's determination of environmental significance under CEQA.

The RPDEIR applies this framework to Crotch's bumble bee, the species addressed in the revised Biological Resources analysis. The RPDEIR recognizes the species' candidate status and associated CESA protection, conservatively assumes that the species may occur in

suitable habitat, and determines that the loss of approximately 6,918 acres of potentially suitable foraging and nesting habitat would constitute a significant impact before mitigation. The RPDEIR does not rely on the absence of confirmed occupancy to avoid a significance determination. It requires preservation and long-term management of suitable comparable habitat at a minimum 2:1 ratio, The preservation of 14,908 acres of grassland/wildflower fields vegetation as well as several other vegetation types within the Preserve System provides greater than a 2:1 preservation-to-impact ratio of conservatively estimated potentially suitable Crotch's bumble bee habitat. Please refer to Response B.4-3 for further discussion of the Preserve System's suitability for Crotch's bumble bee, including the habitat comparisons used in preserve selection, documented floral resources, and the recorded occurrence within Off-Site Preserve Area 4.

MM BIO-1 further requires habitat assessments and preconstruction surveys using methodology accepted by CDFW before ground-disturbing activities conducted in suitable habitat during the colony active period. If the species is detected, MM BIO-1 requires avoidance of known nests, implementation of construction measures intended to minimize potential take, and consultation with CDFW regarding potential take when avoidance of a known nest is not feasible. The Project Applicant must comply with the avoidance, minimization, and compensatory mitigation requirements of any incidental take permit issued by CDFW. With implementation of the habitat-preservation measures and MM BIO-1, impacts to Crotch's bumble bee would be reduced to a less-than-significant level (RPDEIR, pp. 2.1-2 through 2.1-6; MM BIO-1).

Importantly, the fact that the CESA regulatory status of the mountain lion, western burrowing owl, and western spadefoot has changed since publication of the Centennial EIR does not constitute significant new information unless it deprives the public of a meaningful opportunity to comment upon the project's substantial adverse effect on these species. (Guidelines Section 15088.5(a).) A change in the legal characterization of a species does not equate to an adverse physical impact on the species. Here, as further explained in Responses B.4-9 through B.4-12, the change in the regulatory status of these species does not result in a new or more severe significant impact to these species than previously disclosed.

The comment will be included in the administrative record and provided to County decisionmakers for their consideration. No revisions to the RPDEIR are required in response to this comment.

Response B.4-9

The comment states that new information concerning the status, genetics, mortality, habitat needs, and movement of mountain lions requires preparation of a subsequent EIR. The comment notes the 2026 listing of specified Southern California and Central Coast mountain lion populations as threatened under CESA and cites scientific literature concerning habitat loss, fragmentation, genetic isolation, vehicle strikes, rodenticide exposure, human disturbance, wildfire, and other threats. The comment also presents telemetry data for a collared male mountain lion, M419, and asserts that the data show the Project area is critical to movement and gene flow between the Sierra Nevada and mountain lion populations in

Southern and Central California. The comment contends that development of the Project would impair mountain lion movement and behavior through habitat loss, roads, traffic, noise, lighting, rodenticides, invasive species, domestic animals, human activity, and disease. The comment requests preparation of a subsequent EIR evaluating these effects and adoption of additional mitigation.

As a preliminary matter, the comment's citation to Public Resources Code section 21166 and its request for a "subsequent EIR" is misplaced. Public Resources Code section 21166 governs what an agency must do when new information about a project or the circumstances under which it will be undertaken arise *after* certification of an EIR. That analysis is inapplicable here, because the prior Centennial EIR was decertified in December 2025. A different test applies where, as here, new information is disclosed *prior* to certification of an EIR. As further discussed in Topical Response A, *Scope of Recirculated Partial Draft EIR,* and Response B.4-1, new information does not, by itself, trigger the need to recirculate an EIR. Recirculation is only required if new information is "significant" because, for example, it results in a disclosure showing that a new significant environmental impact would result from the project or that there would be a substantial increase in the severity of a previously disclosed environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance. (CEQA Guidelines Section 15088.5, subd. (a).)

The Court of Appeal did not identify any inadequacy in the Centennial EIR's analysis of Biological Resources. The Court expressly upheld the EIR's analysis of the Project's effects on the Tehachapi Linkage and wildlife movement, including movement of mountain lions. The Court determined that the EIR adequately disclosed the importance of the regional linkage, described the Project site's characteristics and potential effects on wildlife movement, considered the competing views presented by public agencies and commenters, and identified the evidence supporting the County's conclusions (RPDEIR Appendix A, Court of Appeal Opinion, pp. 80-87.). The Project has not changed in a manner that would result in a new or substantially more significant impact on mountain lions or wildlife movement.

As explained in Response B.4-8, recirculation of an EIR is not required merely because additional studies have been published or because the regulatory status of a species has changed. The new information must demonstrate that the Project would cause a new significant environmental effect or a substantial increase in the severity of a significant effect previously analyzed (CEQA Guidelines Section 15088.5, subd. (a)). The County acknowledges that the California Fish and Game Commission voted in February 2026 to list specified Southern California and Central Coast mountain lion populations as threatened under CESA and that the listing regulation became effective June 10, 2026 (California Fish and Game Commission 2026). The listing reflects the Commission's evaluation of threats affecting mountain lion populations across a broad geographic area. The change in regulatory status does not itself constitute a new physical condition at the Project site or establish that the Project would cause a new significant impact or a substantial increase in the severity of an impact previously analyzed.

The comment misconstrues the CEQA Guidelines and CEQA case law regarding required impact significance conclusions for projects with the potential to affect CESA-listed species.

As explained in Response B.4-8, State CEQA Guidelines Section 15065(a)(1) does not require a mandatory finding of significance whenever a project may affect an individual member of a listed species. State CEQA Guidelines Section 15065(a)(1) requires a mandatory finding of significance where substantial evidence shows that a project has the potential for a substantially adverse effect on a species such as through reducing the number or restricting the range of a regional population of an endangered, rare, or threatened species. The listing of specified mountain lion populations therefore does not, in itself, establish that the Project would have a significant effect under that standard.

The Centennial EIR adequately accounted for the presence of mountain lions, and the subsequent listing of mountain lions does not change that analysis. The Centennial EIR expressly stated that mountain lions frequent the surrounding foothills and are expected to forage occasionally at lower elevations, including within the Project site. The EIR also disclosed that mountain lion tracks had been observed along a drainage immediately north of SR-138 and east of the California Aqueduct. In its wildlife-movement analysis, the EIR further recognized that dispersal events by species such as mountain lions may be infrequent but nevertheless important to ecological interactions and the maintenance of genetic diversity among regional populations. Thus, both occasional use of the Project site by mountain lions and the potential genetic importance of individual dispersal events were incorporated into the EIR's analysis (Draft EIR, pp. 5.7-50, 5.7-63, and 5.7-164 through 5.7-170).

The County acknowledges the telemetry information for M419 presented in the comment. That information is consistent with the EIR's conclusion that individual mountain lions may occasionally enter or move through portions of the broader Project area. It does not contradict an assumption upon which the EIR's analysis depended. Nor does the comment present information about the status of mountain lion populations in the area, mountain lion population dynamics, reproduction, or dispersal that indicates the Project site plays a previously unrecognized role in mountain lion conservation or is otherwise important to the species in ways not already addressed in the EIR. Information presented in the comment does not implicate a substantial increase in impacts on mountain lion populations.

For clarity, the "Centennial Footprint" depicted in Figure 2 encompasses both areas proposed for development and lands that would remain permanently protected within the Project's Preserve System. The M419 locations depicted in the western portion of the Project occur within land designated for preservation. Although the figure indicates that M419 entered the broader Project boundary, it does not depict continuous movement across the proposed development footprint nor demonstrate that the development area constitutes a necessary through-corridor. The limited number and distribution of M419 locations within the broader Project boundary also does not indicate concentrated or repeated use of the proposed development footprint or show a directional movement path through the development area connecting habitat on opposite sides of the Project. At most, the figure documents occasional use of the western portion of the Project site, principally within land designated for preservation. This is consistent with, rather than contrary to, the Centennial EIR's recognition that individual mountain lions may occasionally forage or disperse through portions of the Project site.

The County does not dispute that an individual dispersal event may contribute to genetic connectivity. That general principle, however, does not establish that every location used by a dispersing animal constitutes a critical movement corridor or that development of other portions of the Project site would obstruct the movement depicted in Figure 2. The telemetry information does not demonstrate that the proposed development footprint constitutes a bottleneck, an indispensable regional movement route, or a regularly used connection between mountain lion populations. Nor does the comment provide site-specific evidence that the development footprint supports a mountain lion nursery site, established scrape site, resident population, or other site-specific resource not considered in the Centennial EIR.

The Centennial EIR evaluated wildlife movement at both regional and local scales based on several wildlife-movement studies. The EIR recognized the regional importance of the linkage between the Tehachapi and San Gabriel Mountains while explaining that the Project site is located largely outside the primary regional movement corridor. The core of the regional linkage occurs several miles north and northwest of the development area. The EIR also considered the California Aqueduct, I-5, and SR-138 as existing impediments to wildlife movement and acknowledged that Project development could alter some movement patterns. Its conclusion was not that existing movement patterns would remain entirely unchanged. Rather, the EIR determined that the Project would not substantially interfere with the regional linkage or cause regional wildlife populations in adjacent areas to become isolated because the principal regional linkage would remain available and movement opportunities would be retained within and around the Project (Draft EIR, pp. 5.7-164 through 5.7-170). The data presented in the comments are consistent with that conclusion.

The Project's Preserve System further supports that conclusion. The approximately 43,079-acre Preserve System (Consolidated 2019 Final EIR, Section 4.0, p. 4-166) includes on-site preserve lands along the Project's northern, western, and southern edges, as well as adjoining off-site preserve lands. The 2,898-acre On-Site Northern Preserve Area is located north and west of the development footprint and includes Oso Canyon. Off-Site Preserve Area 2 adjoins that preserve to the north and includes upper Oso Canyon, retaining movement pathways between the on-site open space preserve and the Tehachapi Mountains. The On-Site Southern Preserve Area and adjoining Off-Site Preserve Area 1 preserve habitat along the Project's southern and southwestern sides, including a riparian corridor providing connectivity to the wildlands associated with Liebre Mountain. Collectively, these lands provide substantial protected habitat and maintain connections with surrounding undeveloped lands (Draft EIR Appendix 5.7-C, pp. C-1 through C-2 and C-14 through C-15).

The western portion of the Project site, where the M419 locations shown in Figure 2 occur and where the EIR identified the most likely north-south passage in or near the Project site, would therefore remain largely as permanent open space. The Project would not construct a continuously developed barrier across the regional landscape. In addition, MM 7-14 requires a 100-foot-wide wildlife underpass where SR-138 crosses the Project's western boundary, flaring to a width of 150 feet within adjoining Project open space, and requires open-space buffers along Cement Plant Road and the California Aqueduct to increase connectivity between preserved open-space areas and potential Aqueduct crossing locations. These

features complement the substantially larger areas of preserved habitat surrounding the development footprint (Draft EIR, pp. 5.7-189 through 5.7-190).

The Centennial EIR also evaluated the types of indirect effects identified in the comment. It considered the potential effects of nighttime lighting and glare, invasive plants, urban-adapted and pest species, pathogens associated with landscaping, increased human presence, domestic animals, refuse and wildlife attractants, construction noise, and operational noise on wildlife habitat and movement. MM 13-2 and MM 13-6 require implementation of a Lighting Plan, also referred to as the Dark Sky Plan, to minimize light and glare affecting biological resources. MM 7-13 requires a County-approved Landscaping Plan using non-invasive species and prohibits identified invasive plants. MM 7-15 requires wildlife-resistant waste and recycling receptacles in common areas and educational materials addressing wildlife feeding, refuse, fallen fruit, and outdoor pet food. MM 7-16 and MM 7-18 establish measures to minimize the introduction and spread of Argentine ants, pathogens, and other pests through landscaping and restoration activities. MM 7-17 restricts public access in natural open-space areas to designated trails, limits recreation in those areas to passive uses, and requires dogs to be leashed within designated natural open space. The Project design also locates higher-density development and higher-volume roadways toward the interior of developed areas and places lower-density, and lower-traffic uses along the interface with preserved open space to reduce operational noise effects on wildlife (Draft EIR, pp. 5.7-166 through 5.7-170 and 5.7-189 through 5.7-193).

The comment's concern regarding anticoagulant rodenticides was also expressly addressed in the Consolidated 2019 Final EIR. MM 4-2 prohibits the use of all rodenticides containing anticoagulants on the Project site and Mitigation Preserve lands. The prohibition must be disclosed to homebuyers through their purchase contracts and the Project's covenants, conditions, and restrictions. In addition to enforcement through those instruments by the master developer and homeowners' association, MM 4-2 is enforceable by the County through the mitigation monitoring and reporting program. Accordingly, the Project includes an enforceable measure addressing the anticoagulant-rodenticide exposure pathway discussed in the comment (Consolidated 2019 Final EIR, Response to Comment B.4-16).

The studies cited in the comment do not demonstrate that the Project would sever the regional linkage, prevent genetic exchange among mountain lion populations, cause the loss of a regional mountain lion population, or produce the ecosystem-wide effects discussed in the comment. Instead, the studies provide information concerning regional threats to mountain lions and the responses of mountain lions to roads, development, lighting, noise, human presence, habitat fragmentation, and other sources of disturbance—all issues previously addressed in the EIR. They also describe the ecological role of mountain lions and the potential ecosystem consequences of the loss of a regional population. These general principles are consistent with the Centennial EIR, which recognized the importance of regional connectivity, the genetic value of infrequent dispersal, and the potential for development-related disturbance to alter wildlife behavior and movement.

The Project also remains subject to applicable requirements of CESA. If a future Project activity may result in take of a mountain lion belonging to a listed population, any required

authorization must be obtained from CDFW before such take occurs. This continuing regulatory obligation does not establish that Project implementation necessarily would result in take, nor does it demonstrate that the Project would cause a new significant environmental effect or a substantially more severe effect than was analyzed in the Centennial EIR.

In summary, the 2026 listing and the telemetry information for M419 are not new significant information as that term is defined in CEQA Guidelines Section 15088.5(a). The EIR already recognized occasional mountain lion use of the Project site, the importance of individual dispersal events to genetic diversity, and the Project's potential direct and indirect effects on wildlife movement. The M419 locations depicted within the Project's western portion occur on land designated for preservation and do not demonstrate concentrated or repeated use of the proposed development footprint or a through-corridor that would be severed by Project development. The Project's substantial Preserve System and applicable mitigation measures retain movement opportunities and address the development-related effects identified in the comment. The information presented in the comment therefore does not demonstrate that the Project would cause a new significant environmental effect or a substantial increase in the severity of an environmental effect previously analyzed. Recirculation of the RPDEIR is not required in response to this comment. The comment will be included in the administrative record and provided to County decisionmakers for their consideration.

Response B.4-10

The comment states that gray wolves are protected as endangered under CESA and the federal Endangered Species Act. It reports that, in February 2026, female gray wolf BEY03f traveled south from the Yowlumni Pack territory in Tulare County through the Antelope Valley and Sierra Pelona Mountains before returning north through the Tehachapi Mountains. The comment states that BEY03f was documented near and may have moved through the Project area, representing the first documented gray wolf occurrence in Los Angeles County in more than a century. Based on this occurrence, the comment asserts that the Project area is important for wildlife connectivity and that a subsequent EIR must analyze and mitigate the Project's potential effects on gray wolves and gray wolf movement.

As discussed in Response B.4-9, the correct test for recirculation of an EIR is whether "new significant information" has been added that deprives the public of a meaningful opportunity to comment upon the project's substantial adverse effect, including a disclosure showing that a new significant environmental impact would result from the project or that there would be a substantial increase in the severity of a previously disclosed environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance. (See CEQA Guidelines Section 15088.5(a).) As explained below, the information presented in the comment does not demonstrate that the Project would have a significant effect on gray wolves or substantially increase the severity of the Project's previously analyzed effect on regional wildlife movement.

As the comment recognizes, BEY03f's 2026 movement represented the first documented gray wolf occurrence in Los Angeles County in more than a century. Since the comment was submitted, CDFW has published additional relevant information. CDFW's October 2026 account identifies the female that briefly entered Los Angeles County as CA091 and reports that she subsequently returned to Tulare and Kern counties. (CDFW 2026a[7], pp. 7–8.) CDFW's July–September 2026 Wolf Management Update likewise identifies CA091 as a dispersing wolf observed without other wolves in Tulare and Kern counties. (CDFW 2026b[8], p. 3.) Neither report identifies an established wolf pack or Area of Wolf Activity in the Project vicinity. CDFW's account distinguishes CA091's brief movement into Los Angeles County from her predominant use of the Yowlumni pack territory in Tulare and Kern Counties and documents her subsequent return to that range (CDFW 2026a, pp. 7–8). This supports characterizing the Los Angeles occurrence as a temporary movement outside that territory, rather than evidence that the Project vicinity had become part of an established wolf territory or supported resident or recurring wolf use. As explained below, this distinction between temporary dispersal and established use is central to evaluating the Project's potential effects on gray wolves.

The comment and subsequent CDFW reports do not identify an established pack territory, den, breeding area, or recurring pattern of wolf use on or near the Project site. BEY03f was a dispersing individual associated with the Yowlumni Pack territory in Tulare and Kern Counties, not a member of a resident population or pack occupying the Project vicinity. CDFW's evaluation of gray wolf ecology explains that dispersing wolves can travel great distances and traverse most habitat types, whereas suitability for sustained occupation depends on factors including adequate prey and water, den sites, human disturbance, road density, and topography (CDFG 2011[9], pp. 14 and 16). Although a dispersing animal may use an area temporarily, that use alone does not establish resident occupation or demonstrate that the area functions as a regularly used or necessary movement corridor.

This distinction is the relevant consideration because the CEQA significance criteria for biological resources address a project's effects on a species' habitat, populations, range, and established movement routes, rather than whether an individual animal has been recorded in an area. Under CEQA Guidelines Appendix G, the questions are whether the Project would have a substantial adverse effect, either directly or through habitat modifications, on a special-status species, and whether it would interfere substantially with the movement of native wildlife or with established native resident or migratory wildlife corridors. Similarly, CEQA Guidelines Section 15065(a)(1) asks whether a project would substantially reduce the habitat of a wildlife species, cause a wildlife population to drop below self-sustaining levels, or substantially reduce the number or restrict the range of an endangered, rare, or threatened species. Each of these questions depends on how the species uses an area: whether the area supports a population, provides habitat the species relies on for breeding, denning, rearing young, foraging, or shelter, or functions as an established route between

7 CDFW 2026a: *California's Known Wolves—Past and Present*. October 2026.
8 CDFW 2026b: *Wolf Management Update: July–September 2026*.
9 CDFG 2011: *Gray Wolves in California: An Evaluation of Historical Information, Current Conditions, Potential Natural Recolonization and Management Implications*. December 2011.

occupied areas. A single, temporary occurrence of a dispersing individual does not, by itself, show that an area serves any of these functions.

This approach is consistent with how species ranges form and persist. A species' range reflects the areas where conditions allow a population to survive, reproduce, and persist over successive generations. Range boundaries are not static. Individuals, particularly dispersing juveniles and young adults, periodically move beyond occupied areas in search of mates, unoccupied territory, or prey. Most of these movements do not result in occupation of the new area. Dispersing individuals in unoccupied areas generally face higher mortality and a low likelihood of finding a mate, and many do not survive or return toward occupied range. As a result, occasional occurrences of individuals beyond the edge of a species' range are expected, while the range itself is defined by where populations persist. Gray wolves illustrate this pattern: dispersing wolves can travel great distances and cross most habitat types, but sustained occupation occurs only where habitat conditions support it (CDFG 2011, pp. 14 and 16). BEY03f's movement into Los Angeles County, the first documented occurrence in more than a century, followed by her return to the Yowlumni Pack range in Tulare and Kern Counties, is consistent with exploratory dispersal beyond the edge of occupied range rather than expansion of that range.

For these reasons, the BEY03f occurrence does not change the EIR's impact conclusions. The Project site does not support a resident wolf population, pack territory, den or rendezvous site, or recurring wolf use. Project development therefore would not remove or degrade habitat on which gray wolves currently rely, and would not affect the survival or reproduction of the Yowlumni Pack, whose territory is located in Tulare and Kern Counties outside the Project vicinity. Because the occurrence also does not show that the development footprint functions as an established or necessary movement corridor, it does not show that the Project would interfere with wolf movement beyond the effects on regional wildlife movement already analyzed in the EIR, as discussed below.

Furthermore, the geographic information provided in Figure 3 does not establish that BEY03f entered the Project site. The comment states only that she was documented in proximity to the Project area and "may have moved through" it. Figure 3 depicts generalized locations on two dates and does not provide an exact travel path between those locations. It therefore cannot establish that BEY03f crossed the Project boundary, traveled through the proposed development footprint, or used a route that would be obstructed by Project development. Even if she passed through the site, that passage alone would not demonstrate regular use or establish that the development footprint constitutes a necessary regional connection.

The Centennial EIR nevertheless evaluated the Project's effects on regional movement by wide-ranging wildlife. The analysis considered multiple wildlife-movement studies, the regional linkage between the Tehachapi and San Gabriel Mountains, site-specific habitat conditions and topography, existing barriers and deterrents such as the California Aqueduct, I-5, and SR-138, and movement opportunities within retained open space (Draft EIR, pp. 5.7-55 through 5.7-59 and 5.7-164 through 5.7-170). It determined that the core of the regional linkage occurs several miles north and northwest of the development area and that

the Project would not cause regional wildlife populations in adjacent areas to become isolated. The generalized BEY03f location information does not contradict the EIR's characterization of the regional linkage or its analysis of the Project's effects on that linkage (Draft EIR, pp. 5.7-55 through 5.7-59 and 5.7-164 through 5.7-170).

As discussed further in Response B.4-9, the Project would retain substantial movement opportunities within and around the Project through its approximately 43,079-acre Preserve System. Preserve lands extend along the Project's northern, western, and southern edges and connect with larger areas of undeveloped habitat outside the development footprint. MM 7-14 additionally requires a wildlife underpass at SR-138 near the Project's western boundary and open-space buffers along Cement Plant Road and the California Aqueduct to increase connectivity between preserved open-space areas and potential Aqueduct crossing locations. These measures retain movement opportunities should wolves disperse through the region in the future. The BEY03f information does not demonstrate that these preserved areas and movement opportunities would be inadequate for an animal dispersing through the broader regional landscape.

In summary, the BEY03f occurrence reflects an individual wolf's exceptional long-distance dispersal through the broader region, rather than establishment of a resident population or expansion of an established pack territory into the Project vicinity. The available information does not establish that BEY03f entered the Project site, that the Project site supports resident or recurring gray wolf use, that the proposed development footprint constitutes a regularly used or necessary wolf movement corridor, or that Project development would obstruct the route she traveled. Substantial undeveloped lands would remain outside the Project site, including approximately 39,213 acres of off-site lands within the Project's Preserve System on Tejon Ranch (Consolidated 2019 Final EIR, Section 4.0, pp. 4-165 and 4-166), providing potential habitat and movement opportunities should wolves expand their range into the region. Considered together with the absence of documented resident or recurring wolf use of the Project site, the continued availability of these lands supports the conclusion that the Project would not significantly reduce habitat available for regional wolf establishment or substantially interfere with future dispersal. The occurrence therefore does not demonstrate that the Project would cause a new significant environmental effect or a substantial increase in the severity of an environmental effect previously analyzed. Recirculation is not required in response to this comment. The comment will be included in the administrative record and provided to County decisionmakers for their consideration.

Response B.4-11

The comment states that western burrowing owl populations have continued to decline in California and that the species became a candidate for listing under CESA in October 2024. It describes regional threats to the species, including habitat loss and fragmentation, destruction of occupied burrows, pesticide use, elimination of burrowing mammals, unsuccessful relocation, predation, and vehicle mortality. The comment states that the Antelope Valley is an important area for breeding burrowing owls and notes that burrowing owls previously were observed on and near the Project site. It further asserts that the focused surveys supporting the Centennial EIR are outdated and did not follow CDFW's 2012

Staff Report on Burrowing Owl Mitigation. Based on the species' candidacy and asserted regional decline, the comment requests additional surveys, impact analysis, and mitigation consistent with CDFW guidance.

The Project has not changed in a manner that would substantially increase a significant impact on western burrowing owl, and the comment does not identify significant new information showing that a new significant impact or a substantially more severe environmental impact than previously analyzed would occur.

The Centennial EIR identified potentially suitable burrowing owl foraging and nesting habitat throughout much of the Project site, disclosed that one pair was observed on the site in 2001, and disclosed that one individual was observed immediately north of the site during surveys in 2006. The 2001 and 2006 observations informed the EIR's assessment of burrowing owl occurrence potential. Based on the available survey data and the presence of potentially suitable habitat, the EIR concluded that burrowing owls could occur on the Project site in low numbers (Draft EIR, p. 5.7-114). . The EIR evaluated the loss of potentially suitable habitat and potential impacts to individual owls, and recognized those impacts to burrowing owls could be significant but would be mitigated to less than significant with implementation of MM 7-2 (Draft EIR, pp. 5.7-114 and 5.7-150). Mitigation Measure MM 7-2 requires preconstruction burrowing owl surveys consistent with CDFW's 2012 guidance, repeat surveys following lapses in construction, and avoidance buffers of 50 to 500 meters around occupied burrows, depending on the season and disturbance level. Buffer reductions require CDFW approval (MM 7-2). As discussed in Response A.4-3, to determine whether baseline survey updates were required to reflect existing conditions, the County considered the extent of previous surveys conducted on the project site, completed a focused literature review, and in light of project site conditions, species requirements, and other relevant factors, determined that survey updates were not necessary. Refer to Response A.4-3 for further information on this review and conclusion that site conditions and the habitat supporting the special-status species evaluated in the Centennial EIR have not materially changed in a manner that would invalidate the previous analysis. This review did not identify changes that would invalidate the EIR's burrowing owl impact analysis. Mitigation Measure MM 7-2 separately requires surveys near the time of construction to identify and protect any owls then present.

The western burrowing owl's subsequent designation as a candidate species under CESA is a change in the species' regulatory status, but it does not reveal a previously unknown physical condition at the Project site. Nor does it establish that the species occurs on the Project site in greater numbers or uses the site differently than considered in the Centennial EIR, or that the Project site's importance to the species differs from that disclosed in the EIR.

The general information and studies cited in the comment address statewide and regional population declines and threats to burrowing owls. They do not provide evidence of a new occurrence, breeding population, or changed habitat conditions within the Project impact area, or suggest the Project site plays a previously unrecognized role in burrowing owl conservation or is otherwise important to the species in ways not already addressed in the EIR. As explained in Responses B.4-1 and B.4-8, new regulatory information and additional

scientific literature does not trigger recirculation unless it demonstrates that the Project would cause a new significant environmental effect or a substantial increase in the severity of a significant effect previously analyzed. Here, the EIR already identified suitable burrowing owl habitat and prior observations on and near the Project site (Draft EIR, p. 5.7-114), recognized the potential loss of individual burrowing owls as potentially significant, and identified MM 7-2 to minimize those impacts (Draft EIR, p. 5.7-150). MM 7-2 requires preconstruction surveys, repeat take-avoidance surveys following lapses in construction, and avoidance buffers around occupied burrows, with CDFW approval required for buffer reductions (MM 7-2).

The commenter's review of current avian database records identified additional observations of wintering burrowing owls in the Project vicinity. Those records reflect continued regional wintering use and do not identify nesting, breeding, or other new site-specific use within the Project site. The Project site also has not experienced development, grading, hydrologic alteration, or other physical changes that would materially alter the grassland habitat conditions evaluated in the Centennial EIR. Accordingly, the available information does not indicate that the Project site presently supports a materially different level or type of burrowing owl use or habitat value for the species than was considered in the EIR, nor does it demonstrate that any new or more severe significant impacts would occur.

The comment's criticism of the timing of the earlier focused surveys does not account for the conservative approach taken in the EIR. Although those surveys were completed before the recommendations contained in CDFW's *2012 Staff Report on Burrowing Owl Mitigation*, the EIR did not use the surveys' results to eliminate the species from consideration. Instead, it assumed that burrowing owls could use the Project site based on habitat conditions and the prior observations and evaluated impacts accordingly.

The comment does not identify inadequacies in the EIR's proposed mitigation measures that are protective of burrowing owls. MM 7-2 requires preconstruction burrowing owl surveys in all potentially suitable habitats before initial site preparation. The measure expressly requires the surveys to follow CDFW's 2012 burrowing owl survey protocol. Surveys must be conducted weekly beginning 30 days before the start of construction or ground-disturbing activities, with a final survey conducted one day before construction. Because Centennial is a phased Project, these requirements will evaluate conditions in potentially suitable habitat in advance of disturbance of the applicable phase or construction area. The preconstruction surveys therefore ensure that any burrowing owls that may occupy the site at the time of project construction will be identified and protected through implementation of avoidance and minimization measures (Draft EIR, pp. 5.7-175 through 5.7-176). MM 7-2 also requires implementation of avoidance and minimization measures consistent with the requirements of CDFW's *2012 Staff Report on Burrowing Owl Mitigation*.

The County acknowledges that, as a CESA candidate species, western burrowing owl presently receives the take protections applicable to threatened and endangered species. MM 7-2's provisions regarding burrowing owl avoidance are revised as described below to emphasize establishment of avoidance buffers around active burrowing owl nests, should

any be located during pre-construction surveys for the Project. Added text is shown in underline, and deleted text is shown in ~~strikethrough~~:

MM 7-2: …

Burrowing Owl Avoidance and Mitigation Measures

~~Submit for DRP and CDFW approval and subsequently implement a Burrowing Owl Exclusion Plan, which includes four avoidance and relocation strategy tiers and associated mitigation requirements set forth in the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012): Tier 1 – Avoidance Buffers; Tier 2 – Passive Relocation; Tier 3 – Prevention of Recolonization of Development Areas; and Tier 4 – Active Relocation (Optional). Site monitoring shall be required prior to, during, and after exclusions of burrowing owls from their burrows. Excluded burrowing owls shall be monitored and documented using artificial or natural burrows on adjoining Mitigation Preserve lands or other open space.~~

If active (occupied) burrowing owl burrows are detected, ~~A~~avoidance buffers shall be established in accordance with the buffer distances described in the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012), which range from 50 to 500 meters, depending on the season and level of disturbance. The buffers may be reduced, but only after consultation with and approval from CDFW.

If avoidance of an occupied burrow is infeasible, the Project Applicant shall consult with CDFW before conducting activities within the buffer. If CDFW determines that an Incidental Take Permit (ITP) or other take authorization is required, no activities that could result in take shall occur unless and until the Project Applicant obtains the required authorization and complies with all conditions imposed by CDFW.

Passive relocation or burrow exclusion shall not occur during the breeding season, and shall be conducted by a qualified biologist. During the non-breeding season, passive relocation or burrow exclusion shall not occur unless authorized by CDFW pursuant to a Burrowing Owl Exclusion Plan approved through the ITP process or other applicable written authorization. At a minimum, the plan shall:

a. Confirm by site surveillance that the burrow(s) is empty of burrowing owls and other species preceding burrow scoping;

b. Type of scope to be used and appropriate timing of scoping to avoid impacts;

c. Occupancy factors to look for and what shall guide determination of vacancy and excavation timing (one-way doors should be left in place 48 hours to ensure burrowing owls have left the burrow before excavation, visited twice daily and monitored for evidence that owls are inside and can't escape i.e., look for sign immediately inside the door).

d. How the burrow(s) shall be excavated. Excavation using hand tools with refilling to prevent reoccupation is preferable whenever possible (may

include using piping to stabilize the burrow to prevent collapsing until the entire burrow has been excavated and it can be determined that no owls reside inside the burrow);

e. Removal of other potential owl burrow surrogates or refugia onsite;

f. Photographing the excavation and closure of the burrow to demonstrate success and sufficiency.

This revision does not constitute significant new information requiring recirculation. Rather, it clarifies and strengthens implementation of the existing preconstruction survey requirement in MM 7-2 by requiring avoidance of occupied burrows whenever feasible, consultation with CDFW and acquisition of any required take authorization before activities that could result in take, and, if passive relocation or burrow exclusion is necessary, implementation of minimum performance standards through a CDFW-approved Burrowing Owl Exclusion Plan. The revision also removes any possible implication that reference to CDFW's 2012 *Staff Report on Burrowing Owl Mitigation* independently authorizes passive relocation. Because the revision increases protection for burrowing owls by clarifying existing mitigation structures and does not disclose a new significant environmental effect, it does not require recirculation of the RPDEIR.

The Project's Mitigation Preserve also contains habitat capable of supporting burrowing owls. Burrowing owls were detected within Off-Site Preserve Area 4 during evaluation of the mitigation lands, and the Preserve System contains occupied burrowing owl habitat and hundreds of acres of additional potentially suitable habitat. Preservation of these lands protects grassland habitat similar to the habitat affected by the Project and provides long-term habitat for the species within the region (Draft EIR Appendix 5.7-C, pp. C-17 through C-18).

In summary, the Centennial EIR identified suitable burrowing owl habitat, disclosed prior observations on and near the Project site, assumed that the species could occur in low numbers, evaluated the loss of suitable habitat and potential loss of individual owls, and required current preconstruction surveys and implementation of avoidance and minimization measures consistent with CDFW's 2012 *Staff Report on Burrowing Owl Mitigation*. The species' CESA candidacy changes the regulatory requirements applicable to any owl detected before construction, but it does not demonstrate a new physical condition or a new or substantially more severe Project impact. As clarified, MM 7-2 requires avoidance of occupied burrows whenever feasible and, where avoidance is infeasible, consultation with CDFW, acquisition of any required take authorization, and implementation of any passive relocation or burrow exclusion pursuant to a CDFW-approved plan containing specified minimum performance standards. No additional analysis or recirculation of the EIR is required in response to this comment. The comment will be included in the administrative record and provided to County decisionmakers for their consideration.

Response B.4-12

The comment states that western spadefoot populations are declining and are sensitive to loss and fragmentation of aquatic breeding sites and surrounding upland habitat. It discusses the importance of metapopulation connectivity, annual variation in breeding success, and the potential effects of climate change on breeding habitat. The comment notes that the California Fish and Game Commission voted on August 13, 2026, to advance western spadefoot to candidacy under CESA. It further asserts that the Centennial EIR's analysis is incomplete because focused surveys conducted in 2004 and 2005 covered only approximately 2,855 acres west of the California Aqueduct, while other portions of the Project site contain cattle ponds, ephemeral ponds, and other seasonally ponded areas. The comment contends that the EIR contradicts itself by stating both that western spadefoot is not expected to occur and that the species may occur in unsurveyed areas containing potentially suitable habitat. It requests focused surveys east of the Aqueduct, additional impact analysis, and mitigation.

The County acknowledges that the California Fish and Game Commission voted on August 13, 2026, to advance western spadefoot to candidacy under CESA. The species' candidacy constitutes new regulatory information, but it does not by itself establish that western spadefoot occurs on the Project site or reveal a previously unknown physical condition within the Project impact area. As explained in Responses B.4-1 and B.4-8, additional environmental review is required only where new information demonstrates that the Project would cause a new significant environmental effect or a substantial increase in the severity of a significant effect previously analyzed.

As discussed in Response B.4-6, focused surveys and habitat assessments for amphibians and reptiles previously were conducted based on habitat suitability and species-specific requirements. These included western spadefoot surveys by Impact Sciences in 2004 and BonTerra Consulting in spring and summer 2005, together with surveys for other special-status amphibians and reptiles where potentially suitable habitat was present (Draft EIR, Table 5.7-2, pp. 5.7-21 through 5.7-22, and Appendix 5.7-B). A review of available database records also did not identify any new western spadefoot occurrences within or adjacent to the Project site. Current species-distribution and range information continues to indicate that the Project site is outside the species' known extant geographic range, with no documented occurrences in the western Antelope Valley region (Jennings and Hayes 1994; Stebbins and McGinnis 2012; CDFW 2025).

The two EIR statements identified in the comment are not contradictory. The species account conservatively acknowledged that certain cattle ponds, ephemeral ponds, and other seasonally ponded areas exhibited generalized characteristics potentially associated with western spadefoot habitat and that occurrence in unsurveyed areas could not be categorically excluded. The impact analysis subsequently evaluated that generalized habitat potential together with the Project site's location outside the species' known geographic range, the absence of documented occurrences in the western Antelope Valley, the results of multiple amphibian surveys, and the negative focused surveys conducted in the areas supporting the highest-quality potential habitat. Based on the totality of that information,

the EIR concluded that western spadefoot was not expected to occur on the Project site. A conservative acknowledgment of uncertainty in the species account does not conflict with the ultimate impact conclusion based on the full evidentiary record (Draft EIR, pp. 5.7-109 through 5.7-110 and 5.7-146).

The comments' comparison of the focused survey acreage with the total Project acreage also does not demonstrate that the surveys or analysis were inadequate. Focused wildlife surveys are based on the location of potentially suitable habitat and the ecological requirements of the target species; they are not necessarily intended to constitute an acre-by-acre census of an entire project site. Because the Project site is outside the species' known range, focused western spadefoot surveys were conducted in those areas identified as providing the highest-quality potential habitat. Western spadefoot was not detected during those surveys or during the other amphibian surveys conducted between 2000 and 2006. The geographic extent of the surveys was disclosed in the EIR and considered together with habitat conditions, range information, and the absence of regional occurrence records.

The presence of a cattle pond, ephemeral pond, or other areas that temporarily hold water also does not, standing alone, demonstrate that western spadefoot is present or that a feature provides functional breeding habitat. Evaluation of occurrence potential also considers geographic range, hydroperiod, substrate, surrounding upland habitat, landscape context, and known regional records. Although the EIR conservatively identified certain ponded features as having generalized habitat characteristics, neither the previous surveys nor the subsequent database and range review identified evidence that western spadefoot occupies the Project site or the western Antelope Valley.

The scientific literature cited in the comment describes the species' population declines, dependence on aquatic and upland habitat, variable reproductive success, metapopulation dynamics, and potential sensitivity to climate change. This information supports the importance of protecting occupied western spadefoot habitat and maintaining connectivity among extant populations. It does not, however, provide Project-specific evidence that the species occur on the Project site, that the site is connected to an existing western spadefoot population, or that Project implementation would fragment or isolate an extant population. General information concerning threats affecting the species elsewhere does not demonstrate that the Project would cause a new or substantially more severe impact at a site outside the species' known extant range.

The Project remains subject to applicable requirements of CESA. If western spadefoot is unexpectedly detected in connection with future Project activities, the Project must comply with the protections and authorization requirements applicable to the species at that time. This continuing regulatory obligation does not establish that western spadefoot currently occurs on the Project site or that focused surveys and additional CEQA mitigation are required where the species is not expected to occur.

In summary, the Centennial EIR conservatively considered western spadefoot based on generalized habitat characteristics, disclosed the limited potential associated with seasonally ponded features, and evaluated the results of focused and general amphibian

surveys together with the Project site's location outside the known range and the absence of regional occurrence records. Subsequent review has identified no new occurrence or physical change indicating that western spadefoot is present on or adjacent to the Project site. The species' CESA candidacy changes its regulatory status but does not demonstrate a new physical condition or a new or substantially more severe Project impact. Additional focused surveys, mitigation, or revisions to the RPDEIR are not required in response to this comment, nor does the information in the comment rise to the level of "new significant information" requiring recirculation pursuant to CEQA Guidelines Section 15088.5(a). The comment will be included in the administrative record and provided to County decisionmakers for their consideration.

Response B.4-13

The comment states that placing more people in fire-prone landscapes increases ignition risk and the RPDEIR fails to adequately assess and mitigate the Project's impact to wildfire risk. The comment describes impacts of historical destructive wildfires, including property damage, deaths, human health impacts, and economic losses. The comment states that almost all destructive wildfires are accidentally ignited by humans or human infrastructure near roads and development and that development and roads in fire-prone landscapes increases ignition risk while climate change is amplifying fire conditions. The comment states that the RPDEIR fails to comply with CEQA requirements that a project's significant environmental impacts be identified and analyzed, including those caused or exacerbated by bringing development and people into wildfire risk areas.

As described in RPDEIR Section 1.1 and Topical Response A, *Scope of Recirculated Partial Draft EIR*, the Second District Court of Appeal's Opinion held that the Centennial EIR's analysis of the wildfire risks associated with the Project's off-site infrastructure improvements lacked sufficient detail to enable those who did not participate in its preparation to understand and to consider meaningfully the Centennial EIR's conclusion of less than significant off-site wildfire impacts. On-site wildfire impacts were not at issue in the appeal, because no party appealed the Superior Court's April 5, 2021, Order, which found that the Centennial EIR "adequately discloses the risk of the fire from the Project related to introducing people to the Project site" and that the "EIR's discussion and analysis of the on-site potential impact of the Project related to wildfires as less than significant is sufficient" (2021 Superior Court Order, pp. 53-58).

To address the deficiencies identified by the Court of Appeal in the Opinion, Section 2.3, *Wildfire*, of the RPDEIR, supersedes the fire safety analysis set forth in Section 5.3.3 of the Draft EIR. The wildfire analysis is a standalone section that incorporates the new threshold questions for wildfire and a revised threshold question for hazards and hazardous materials related to fire safety from Appendix G of the CEQA Guidelines, which were added in December 2018 as part of a comprehensive update to the CEQA Guidelines.

The RPDEIR includes a robust analysis of potential wildfire impacts associated with the Project, including impacts caused or exacerbated by bringing development and people into the Project area. The analysis uses a comprehensive, first-ever modeling approach detailed

in Appendix J - *Centennial Off-Site Ignition Risk Assessment.* The focused Off-site Ignition Risk assessment evaluates the potential for the Project to cause fires that ignite on-site and subsequently spread off-site, thereby impacting existing land uses in the Project's proximity. This assessment relies on the Project's wildfire environment, potential ignition sources, and wildfire risk reduction measures to determine the Project's relative level of risk for causing off-site ignitions. The Project's existing conditions are described, including the Project area's climate, topography, vegetation, and State Fire Hazard Severity Zone designations. Advanced wildfire behavior modeling was conducted to understand and disclose wildfire hazard along the Project's edges and within the greater region. Modeling outputs such as flame length, rate of spread, fireline intensity, landscape burn probability, and integrated hazard are provided to assess the multiple contributors of wildfire hazard. In addition, the Project also analyzed the potential for wildfire spread near the Project site through wildfire progression modeling. A total of three wildfire progression scenarios were modeled to highlight likely origins of wildfire ignitions surrounding the Project, and the subsequent wildfire spread towards the Project site. These scenarios were utilized to inform the assessment of the Project's evacuation capacity. Wildfire progression modeling was also performed to assess the effects of the Project's perimeter fuel modification zones towards slowing the spread of off-site wildfires (See Figures 9-10 of RPDEIR Appendix J - *Centennial Off-Site Ignition Risk Assessment.)* As detailed in Appendix J and Section 2.3 of the RPDEIR, the overall Project Wildfire Off-Site Ignition Risk Level is considered to be "Moderate" as defined in the assessment. (See RPDEIR Appendix J - *Centennial Off-Site Ignition Risk Assessment*, p. 75 ["The method has been developed so that it provides a narrow possibility of achieving a Moderate off-site fire ignition risk if a project is located within a Very High FHSZ. In this case, a project would need to meet a very high bar for mitigating wildfire hazards as the only path to achieve a Moderate final ranking. It is far more common for projects to result in a High or Very High off-site ignition risk result than Moderate, unless the project provides a strategic, targeted set of mitigation measures addressing the primary ways that fire could ignite and move to off-site fuels."].)

The RPDEIR evaluates the potential for increased wildfire ignitions caused by urban development in the wildland-urban interface. (RPDEIR, pp. 2.3-40 through 2.3-44; Appendix G, Centennial *Wildfire Safety Plan*, Chapter 5.) As described in the RPDEIR, the Project would develop a new community with commercial uses, recreational uses, and institutional/civic uses, some of which would include healthcare facilities or spaces that would have the potential to hold large events or assembly of people. The Project's proposed development would introduce approximately 57,150 people into currently undeveloped areas. In general, research has suggested that urban development in the wildland-urban interface (WUI) has resulted in more wildland fire ignitions when analyzing all WUI communities built nationwide from 1990-2010. (Radeloff et al. 2018.) Chen and Jin found that most human-caused wildfire ignitions in California occur near populated areas and along traffic corridors. (Chen and Jin, 2022.) In Southern California, Syphard and Keeley identified powerlines, arson, and equipment use as the main sources of these ignitions. (Syphard and Keeley, 2015.) Therefore, new developments in the WUI may result in an increased potential for these specific ignition types. This potential risk is disclosed and evaluated in Section 2.3 of the RPDEIR.

In its current state, the Project site is largely undeveloped, and human presence is generally limited. With a greater number of people and structures, there is a greater potential for activities and accidents involving the use of fire, flammable/combustible materials, and electrical systems, along with the creation of fire hazards from candles, cooking, electrical and heating sources, and smoking and the use of equipment, appliances, and materials that may cause fire, explosion, or the release of smoke, gas, and/or hazardous materials. In addition, secondary impacts of new development in the WUI such as increased vehicle traffic and road use have the potential to increase the likelihood of roadside ignitions caused by vehicles themselves or human negligence (*e.g.*, cigarette disposal, dragging chains). Thus, the RPDEIR describes that new development in the WUI may increase the likelihood of incidents requiring LACoFD response and calls for service over existing conditions.

While recognizing that new development may increase fire ignitions generally, the RPDEIR also acknowledges that it is difficult to determine an exact direct correlation between ignition risk and increased population residing in the WUI. For example, there is no standard method to assess how many new ignitions will occur as a result of bringing in roughly 57,150 people to the WUI due to the dynamic nature of wildfire risks and ignitions. Further, existing research related to wildfire ignitions generally does not distinguish between the various potential forms of urban development that may occur within the WUI. As evident from many studies, wildfire risk to structures and the potential for human-caused ignitions are not identical across all forms of WUI development. For example, both wildfire risk and ignition risk have been found to be higher where houses meet or intermingle with wildfire prone vegetation (*i.e.*, the Wildland-Urban Intermix). (Radeloff et al., 2018; Theobald et al., 2007; Stewart et al., 2007; Sirca et al., 2007.) Research explains that "[t]he WUI, where housing spacing is low to intermediate, is an apparent influence in most ignition maps," further enforcing the conclusion that more rural/large parcel housing poses a higher ignition risk than master planned communities with more urbanized landscapes. (Syphard and Keeley, 2015.) In fact, the highest ignition risks are often associated with low-density housing where structures are interspersed with natural vegetation. (Syphard and Keeley, 2019.) As the degree of development-adjacent vegetation increases, so does the potential for vegetative ignition and wildfire. This relationship is true for wildfire risks to structures, as well as the risk for ignitions to occur and spread offsite. Conversely, the potential for human-caused ignitions in higher-density developments with a clear boundary between urban and wildland areas (*i.e.*, Wildland-Urban Interface) is inherently lower due to low or absent levels of wildfire prone vegetation intermingled between structures and roadways. (Syphard and Keeley, 2019.) Syphard and Keeley state, "However, it appears that when human population density and development reach a certain threshold density, ignitions decline, and this is likely the result of diminished and highly fragmented open space with fuels insufficient to sustain fire. In addition, above a certain population threshold, fire suppression resources are likely to be more concentrated in the WUI." The authors go on to state "Contrary to what might be expected, fire activity is not highest where population is highest. Instead fire frequency, and to a lesser extent, area burned, tend to peak at low- to intermediate population and housing density (Syphard et al., 2007; Westerling and Bryant, 2008; Mann et al., 2016); this relationship has also been observed in other areas across the globe (Syphard et al., 2009; Aldersley et al., 2011; Bistinas et al., 2013)."

As described in the RPDEIR, the evidence does not demonstrate that the Project will increase off-site wildfire ignitions. Its design as a fire-resilient interface community (*i.e.*, modern, master-planned housing developed with appropriate hardscaping and landscaping meeting fuel modification best practices as opposed to housing intermingling with wildfire prone vegetation) aligns with conditions shown in the literature to have low ignition risk, especially compared to low-density intermix WUI development. While the Project would introduce new land uses and people in an area that is within moderate, high, and very high fire hazard severity zones, upon development of the Project, the site would become a fire-hardened, defensible community that includes hardened evacuation routes out of the area. The Project's approach to fire risk reduction is multi-layered and includes the following measures:

- Unlike developments in the WUI prior to 2007, wildfire risks associated with the Project are reduced due to modern fire safety standards such as extended defensible space mandates, including the "Zone 0 – ember resistant zone (the area within 0 to 5 feet of a structure most critical for preventing home ignition during a wildfire), which will apply to the Project when Zone 0 regulations are adopted. This zone is designed to eliminate combustible materials and minimize places where embers can accumulate and ignite) which has been proven to greatly increase home survivability during wildfire exposure. (Zamanialaei et al, 2025; IBHS, 2023.)
- State-of-the-art, ignition-resistant construction regulatory requirements for all new residential, non-residential, and public facility buildings meeting Chapter 5 of the California Wildland-Urban Interface Code (formerly Chapter 7A of the California Building Code), Title 26 of the County of Los Angeles Building Code (LACBC), and the Los Angeles County Fire Department (County Fire) requirements. These standards require, among many other measures, fire-resistant roofing to resist ignition from embers or building-to-building fires, vent covering and opening limitations to avoid ember intrusion, noncombustible or ignition-resistant exterior walls, ignition-resistant eaves, and porch ceilings, insulated windows and exterior doors, fire-resistant exterior decks and walkways, and ignition-resistant under-flooring and appendages. These standards have proven to substantially reduce the risk of buildings catching fire or spreading fires during a wildfire event.
- Fuel modification zones around the perimeter of the Project ranging from 100-200 feet to provide defensible space and firefighter access to protect against encroaching fires and minimize the risk of fires originating on the Project site from moving off-site. The fuel modification zones are based on Los Angeles County Fire requirements and confirmed with site-specific modeling. The zones will be implemented by knowledgeable professionals, inspected by third-party inspectors, and maintained in perpetuity by the HOA, as required by applicable regulations.
- Ongoing, funded maintenance, inspections, and enforcement of fuel modification zones and other fire protection features by the HOA or similar organization funded by an assessment or tax on parcels within the Project, as required by applicable regulations.

- Existing and planned firefighting capabilities, including new fire stations, to ensure a response to fire and medical emergencies, as required by applicable regulations.
- In all structures, additional fire protection systems, including internal fire sprinkler systems, as required by applicable regulations.
- Fire-resistant landscaping regulatory requirements.
- Multiple access routes for fire apparatus and emergency vehicles, as required by applicable regulations.
- Multiple evacuation routes during a wildfire event. (See RPDEIR Appendix H, Wildfire Evacuation Technical Report, for a detailed description of evacuation routes.)
- Code-compliant water capacity, delivery, and availability, with additional surface water supply.
- Ongoing resident fire safety education and evacuation planning.
- Undergrounding of all site electrical lines, as required by applicable regulations.

For a complete list of the Project's risk reduction measures including regulatory requirements, Specific Plan requirements, requirements from the Climate Resolve Settlement Agreement, Project specific mitigation measures, and additional safety measures, see Appendix K of the RPDEIR.

The RPDEIR also evaluates increased ignition risks during the construction phase. (See RPDEIR, pp. 2.3-38 through 2.3-39.) As described in the RPDEIR, ignition risks during construction are heightened by the use of heavy equipment and tools. Earth-moving equipment, vehicles, chainsaws, welders, grinders, woodchippers, torches, and blasting activities (if required) can generate sparks, heat, or fuel leaks that may ignite dry vegetation. Compost piles left on-site for extended periods may also combust and produce embers. Human-caused accidental ignitions, such as discarded smoking materials, temporary electrical connections, improperly placed generators, and poor equipment maintenance, further contribute to wildfire risk during construction. Left unaddressed, the risk these on-site construction activities present would be considered a significant impact.

To address this impact, MM WILD-1 requires the project proponent/operator to implement all protocols for reducing the potential of ignitions during construction set forth in the Project's proposed Construction Fire Prevention Plan (CFPP), included as Appendix I to the RPDEIR, to minimize construction-phase ignition risks by establishing comprehensive controls on combustible materials, equipment use, and site operations. The CFPP reduces fire risk by limiting the amount of flammable and combustible materials stored on-site and requiring any necessary materials to be stored away from potential ignition sources. Additionally, the CFPP reduces the likelihood of vehicle-related ignitions by requiring vegetation management around parking areas, including clearing grass and brush within a minimum 10-foot buffer, and other measures such as fire-safe hot work practices, dedicated fire watch, and other operational requirements. The CFPP also ensures evacuation routes remain unobstructed, supporting both fire safety and emergency response.

The comment points to general information relating to destructive wildfires in other communities with different baseline characteristics and design requirements and does not provide substantial evidence demonstrating that the analysis in the RPDEIR is insufficient. As stated on page 2.3-16 of the RPDEIR, the State Fire Marshal's data shows that homes constructed according to CWUIC Chapter 5 standards (formerly California Building Code Chapter 7A) significantly reduce fire risks for properties located in the wildland-urban interface (WUI) and fire hazard severity zones. (CBIA, 2022.) Additionally, the risk of major structural damage is greatly minimized when homes are part of a well-planned and mitigated master-planned community, such as the Project. (FEMA, 2023.) According to the Office of the State Fire Marshal Property Loss Data, no master-planned community built after the adoption of the California Building Code Chapter 7A has experienced significant structural losses. Therefore, modern code-compliant master planned communities provide a baseline level of high wildfire safety when designed to modern fire code requirements.

The RPDEIR describes how the Project will differ from communities affected by historical destructive wildfires, concluding that Centennial's wildfire risk is substantially lower than those of older communities (such as Paradise, Coffey Park, Pacific Palisades, and Eaton Canyon). (RPDEIR, pp. 2.3-39 through 2.3-43, 2.3-60 through 2.3-61, Appendix G, *Centennial Wildfire Safety Plan*, Section 4.9.1.)

For example, during both the Palisades and Eaton Fires of January 2025, wildfire was driven into the Palisades and Altadena communities by extreme Santa Ana winds exceeding 80 mph. This rare level of extreme weather combined with other factors, such as outdated home construction and dense urban vegetation without enforced or prevalent fuel modification, can contribute to urban conflagrations. Structural conflagration is defined as fire encompassing all of a given structure. A built environment conflagration can result from wildfires, where fire spreads uncontrollably from structure to structure. In both the Palisades and Eaton Fires, structures themselves became the main driver of wildfire spread. (IBHS 2025.) While methods for modeling the potential for structural conflagration and the resulting fire behavior are currently being researched, the key factors listed below are common community characteristics believed to have contributed to widespread structure losses during the Eaton and Palisades Fires. (IBHS 2025.) The Project's comparison to these features is also provided below.

- The majority of the construction in the Palisades and Eaton neighborhoods took place in the 1950s, before the introduction of California Building Code Chapter 7A, which regulates building standards in wildfire-prone areas.

  The Project's proposed structures would be built utilizing the most current construction methods designed to reduce wildfire exposure and reduce the likelihood for structure fires to spread into off-site areas. Construction methods intended to reduce wildfire exposure would comply with the wildfire protection and ignition resistant building construction requirements contained in the Los Angeles County Building Code and Chapter 5 of the California Wildland-Urban Interface Code; Los Angeles County Building Code, Chapter 7A; Los Angeles County Residential Code, Section R327; Los Angeles

County Referenced Standards Code, Chapter 12-7A, Materials and Construction Methods for Exterior Wildfire Exposure.

- Connective fuels laced between homes and hazardous plant species in the Palisades and Eaton neighborhoods (palms, cypress, pines) created pathways for structure-to-structure fire spread and contributed to extreme fire behavior within the Palisades and Altadena communities.

  Zone A fuel modification regulatory requirements for the Project (MM WILD-2) will require highly maintained, irrigated vegetative landscaping between homes and perimeter Fuel Modification Zones to keep an active flaming front at great distances from structures and support defensibility for the existing fire environment.

- Narrow roadways and road blockages in the Palisades and Eaton neighborhoods caused by parked and abandoned vehicles prevented and slowed emergency response and limited direct wildfire suppression efforts.

  All Project on-site roads would facilitate emergency ingress and egress and will be constructed to County standards and would include a 28-foot-wide private access road that will be used for LACoFD access. In addition, the Project includes multiple evacuation routes that may be utilized during a wildfire event. *See RPDEIR Appendix H, Wildfire Evacuation Technical Report, for a detailed description of evacuation routes.* Further, the Project includes a robust wildfire education program which will educate residents and employees regarding wildfire evacuation and fire safety measures.

The Project's fire-smart design, in accordance with current and updated regulations, is believed to mitigate the potential for structure loss from wildfire. Additionally, the State Fire Marshal's data shows that homes constructed according to CBC Chapter 7A standards (now Chapter 5 of the California Wildland-Urban Interface Code) significantly reduce fire risks for properties located in the WUI and FHSZs. Therefore, newer, code-compliant master planned communities, such as Centennial, provide a baseline level of high wildfire safety when designed to updated fire code requirements. The differences between modern construction and older communities impacted by wildfires are depicted and further described in the RPDEIR at pages 2.3-66 through 2.3-76.

The comment implies that the Centennial Project would result in an increase in large and destructive wildfires, therefore contributing to direct and indirect financial impacts. However, the RPDEIR includes a robust analysis of the potential for off-site ignitions provided in Appendix J – *Centennial Off-Site Ignition Risk Assessment.* Based on the site-specific analysis and considering the various input factors for the fire environment, the Project's hazard, ignition risk and mitigation measures, the overall Project Wildfire Off-Site Ignition Risk Level is considered to be Moderate. Financial impacts caused by structure losses and damages from wildfire are unlikely due to the Project's fire-hardened design including highly ignition resistant building construction and wide and maintained perimeter fuel modification zones (features not present within the Palisades and Altadena

communities). Further, under CEQA, economic or social effects of a project are not to be treated as significant effects on the environment (CEQA Guidelines Section 15131(a).) CEQA requires only analysis of physical environmental impacts. (Pub. Res. Code Section 21100(d) ["…[A]ny significant effects on the environment shall be limited to substantial, or potentially substantial, adverse changes in physical conditions…"].) Significant impacts analyzed under CEQA must be related to a physical change in the environment. (CEQA Guidelines Sections 15382, 15358(b); *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, 576-582 [CEQA does not require an analysis of social impacts]; *Maintain Our Desert Env't v. Town of Apple Valley* (2004) 124 Cal.App.4th 430, 445 ["…[S]ocial, economic and business competition concerns are not relevant to CEQA analysis unless it is demonstrated that those concerns will have a significant effect on the physical environment."] Further, while not required to mitigate wildfire impacts to less-than-significant levels, Centennial and Climate Resolve entered into a Settlement Agreement that requires Centennial to establish a Good Neighbor Firewise Fund of $500,000 annually to aid communities with a population of less than 100,000 located within 15 miles of the Tejon Ranch in order to reduce off-site fire risks, increase fire prevention, protection, and response measures and reduce or avoid impacts to Project residents and neighboring communities. (See RPDEIR, p. 2.3-1.)

The comment cites various newspaper and journal articles as support for commenter's assertions, including:

- AccuWeather news article estimating damages and economic loss from Los Angeles wildfires. (Danielle, 2025.)
- UCLA Anderson School of Management website post summarizing the estimated economic impact of the Los Angeles fires. (Li & Yu, 2025.)
- The comment cites D. Wang et al., 2021, which is cited in the UCLA Anderson School post, but the original reference document is not provided.
- The comment cites Balch et al., 2024 but this reference document is not included.
- Environmental Research Letters article investigating the spatial distribution of contemporary wildfire ignitions in California, using a machine model to examine the complex relationships between ignitions and a suite of environmental co-variates, including human settlement, climate, fuels, and topographical variables, with the goal of providing guidance on prioritizing where and which fire management strategies may be pursued. (Chen & Jin, 2022.)
- Global Environmental Change article summarizing a modeling framework study to compare the importance of climatic and human variables for explaining fire patterns and structure loss. (Syphard, Rustigian-Romsos, 2019.)
- Center for Biological Diversity report recommending legislation prioritizing stopping new home construction in highly fire-prone wildlands and retrofitting existing homes with high fire risk. (Yap et al., 2021.)

The cited articles reference generalized information with respect to the impact of historical fires and wildfire research. These articles do not raise any specific environmental issues particular to the Project site or any deficiency in the RPDEIR analysis. Danielle, 2025 reports on a preliminary estimate of total damage and economic loss associated with the Los Angeles fires. Li & Yu, 2025 summarized the estimated economic impacts of the Los Angeles fires. Chen & Jin, 2022 investigated the spatial distribution of contemporary wildfire ignitions in California, using a machine model to examine the complex relationships between ignitions and a suite of environmental co-variates, including human settlement, climate, fuels, and topographical variables, with the goal of providing guidance on prioritizing where and which fire management strategies may be pursued. Syphard, Rustigian-Romsos, 2019 developed a modeling framework to compare the importance of climatic and human variables for explaining fire patterns and structure loss for three diverse California landscapes. Yap et al., 2021, a report prepared by the commenter, recommends land use reforms to address wildfire risk. CEQA requires that the Final Recirculated EIR address comments submitted during the public comment period that raise significant environmental issues on the adequacy of the RPDEIR. (PRC Section 21091(d)(2)(B); CEQA Guidelines Section 15088(c).) "The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information or does not explain the relevance of evidence submitted with the comment." (CEQA Guidelines Section 15088(c).) Please refer to the entirety of this Response B.4-13 with respect to commenter's statements it claims are supported by the various articles. CEQA does not require analysis of speculative impacts.

In addition, the Global Environmental Change article (Syphard, Rustigian-Romsos, 2019), cited in the comment for the claim that almost all destructive wildfires are accidentally ignited by humans or human infrastructure, is more nuanced than claimed in the comment. The article's conclusion is that housing and human infrastructure have been more responsible for explaining fire ignitions, but climate, topography, and fuel variables have been more important for explaining large fire patterns. The study found that most structure loss occurred in areas with low housing density (from 0.08 to 2.01 units/ha). As described above and in the RPDEIR, the article states: "Contrary to what might be expected, fire activity is not highest where population is highest. Instead fire frequency, and to a lesser extent, area burned, tend to peak at low- to intermediate population and housing density (citation omitted); this relationship has also been observed in other areas across the globe (citations omitted). This hump-based relationship reflects, in part the increased ignitions in rural and residential areas (compared to wildlands), balanced against lower potential for fire spread and/or greater suppression in urban areas (citations omitted)." The article continues: "One commonality across regions was that anthropogenic variables were most important in explaining patterns of fire ignitions, whereas large fires were more related to topography, climate, and fuel (via AET and CWD). This finding is not surprising given that most fires in California are started by humans (citation omitted). The finding is also consistent with other studies that have shown differences between the drivers of small and large fires (citations omitted) and that large fires are more likely to occur in remote areas where fuel continuity is greater, with severe winds better able to propagate fires via long-distance ember

production, and access to suppression is lower." The article concludes: "Thus, small, frequent fires caused by human ignitions do not necessarily lead to highly destructive fires. Instead, the fires most likely to cause structure loss tend to be ignited in low-intermediate population or housing density (citations omitted), adjacent to areas of high fuel loading."

The article states that the most effective mitigation may be land use and urban planning decisions that reduce the exposure of homes to wildfires; however, the article also concludes that "mitigation measures focused on defensible space and fire-safe construction materials, particularly when houses are closely spaced, are also critical for preventing future losses (citations omitted), as are other traditional fire management practices such as fire suppression and strategic location of fuel breaks to allow safe firefighter access to defend homes." The findings of this article are consistent with the analysis in the RPDEIR, which acknowledges the potential risk of increased ignition from the presence of additional humans and infrastructure but requires mitigation measures to control the spread of a fire so as to avoid structure loss and other environmental impacts.

In summary, the RPDEIR adequately evaluates potential impacts associated with development of a new community at the Project site, including both on-site and off-site Project facilities. The Project goes above and beyond to mitigate wildfire risk and provides a comprehensive approach to wildfire risk mitigation. The Project's risk reduction requirements and mitigation measures (38 in total) are provided in Section 7 of the Wildfire Safety Plan included at the RPDEIR at Appendix G.

Response B.4-14

This comment states that the RPDEIR fails to adequately analyze the area's historical fire regimes and the role Indigenous communities likely played in shaping the fire ecology habitats in and adjacent to the Project area. The comment further states that Indigenous communities are disproportionately impacted by wildfire due to community proximity to high fire-prone areas and high vulnerability due to socioeconomic barriers impacting recovery and health care access and recommends that consultation with Native Tribes and incorporation of Indigenous science, including but not limited to oral histories, ethnographies (that may include burn scars and charcoal records), and archeological data should be incorporated into the fire history analysis.

The RPDEIR includes a detailed discussion of the fire history of the Project site and its vicinity, taking into account CAL FIRE records and more than 150 years of human management of the Project site. (RPDEIR, pp. 2.3-9 through 2.3-10.) Based on fire history records included in CAL FIRE's Fire and Resource Program database and the Integrated Reporting of Wildland-Fire Information database, the RPDEIR documents 23 wildland fires that have occurred within 1 mile of Project site dating back to 1800, and 196 reported wildfire ignitions within 5 miles of the Project site. CAL FIRE records are routinely relied on by lead agencies and provide substantial evidence supporting the RPDEIR's discussion of the wildfire environmental setting for the Project. (14 Cal. Code Regs. Section 15384.).

The RPDEIR also considers the land management history of the Project site and adjacent lands, describing on page 2.3-7:

> "Tejon Ranch remains unfragmented and has been carefully managed with livestock and cattle grazing for nearly 160 years. Actively grazed landscapes, including those of portions of the ranch within the Antelope Valley of Los Angeles County, assure sustainability and limit the severity of wildfire because grassland fuel loads are reduced. The sustainable grazing operation employed at Tejon Ranch effectively reduces the grass fuels on an ongoing basis which reduces the potential for ignitions and for rapid fire spread.
>
> Tejon Ranch has maintained a database since 2013 providing annual Residual Dry Matter (RDM) records from locations across the ranch. RDM refers to the unused forage at the end of the grazing season (fall) and provides an approximation of the residual fuel load. (Ratcliff et al., 2022.) At the end of the grazing period where the occurrence of extreme fire weather (Santa Ana wind conditions) is most likely, the average RDM the Centennial Project site equates to roughly 467 pounds per acre. Flame lengths have been found to be reduced to under 8 feet when RDM is managed to under 1,225 pounds per acre (Ratcliff et al., 2022). The sustainable grazing operation employed at Tejon Ranch effectively reduces the grass fuels on an ongoing basis which reduces the potential for ignitions and for rapid fire spread. Following buildout of Centennial, Tejon Ranch has committed to maintaining grazing management within the Project's open spaces. Tejon Ranch's commitment to ongoing grazing management at Centennial facilitates the historic land use and stewardship of the area while also maintaining and reducing the vegetative fuels. Because of the variability of the historic grazing practices, this analysis considers the grazing program as an additional environmental benefit but, conservatively, this analysis does not rely upon those benefits when determining the Project's potential impacts under CEQA."

Finally, the RPDEIR describes that wildfires occurred prior to record-keeping by CAL FIRE, and prior to the arrival of Euro-Americans in California when the region was populated by various Indigenous communities, including but not limited to Kitanemuk, Interior Chumash, Tejon Tribe, and Tataviam. (RPDEIR, p. 2.3-10.) The comment has not provided evidence to demonstrate that additional information regarding unrecorded fires occurring more than 100 years ago would change the Project's wildfire risks analysis or the conclusions of the RPDEIR. The RPDEIR relies upon 112 years of CAL FIRE records, 160 years of land management history, and knowledge that fires on and near the site very likely occurred prior to CAL FIRE records to provide substantial evidence supporting the RPDEIR's determinations regarding the significance of the Project's wildfire impacts. (RPDEIR p. 2.3-9 to 2.3-10.)

The comment cites various newspaper and journal articles as support for commenter's assertions, including:

- Chapter Nineteen of Fire in California's Ecosystems regarding the use of fire by Native Americans in California, digitally published by University of California Press. (K. Anderson, 2018.)
- California Archaeology journal article regarding archaeobotanical evidence for Indigenous burning practices and foodways at an identified archaeological site. (Cuthrell, 2013.)
- Journal of Forestry article regarding the role of Indigenous burning in land management. (Kimmerer & Lake, 2001.)
- Forest Ecology and Management journal article regarding prehistoric fire area and emissions from California's forests, woodlands, shrublands, and grasslands. (Stephens et al., 2007.)
- International Journal of Wildland fire article regarding drivers of California's changing wildfires. (MacDonald et al., 2023.)
- PLOS ONE article regarding unequal vulnerability of communities of color to wildfire. (Davies et al., 2018.)
- Pacific Standard and Investigate West magazine articles regarding farmworkers continuing to work despite wildfire smoke. (Herrera, 2018 & Kardas-Nelson et al., 2020.)
- Vice magazine article regarding disproportionate health impacts of wildfire on people of color. (Parshley, 2018.)
- Journal of Wildlife Management article regarding Yurok traditional ecological knowledge and wildlife management. (Ramos, 2022.)

These articles provide general information regarding Indigenous cultural burning practices, prehistoric fire history, forest and fire management practices, economic vulnerability to and health impacts of wildfire on minority populations, wildfire smoke impacts to farmworkers, integrating Indigenous concepts into wildlife management. These articles do not raise any specific environmental issues or deficiency in the RPDEIR analysis. Specifically, K. Anderson, 2018 describes Native American use of fire and how this cultural activity has influenced ecosystems and how it can continue in light of conflicting land management objectives. Cuthrell, 2013 evaluates evidence from an archaeological site in the Quiroste Valley to support the hypothesis of frequent anthropogenic landscape burning during the late Holocene period. Kimmerer & Lake, 2001 highlights the findings of the literature on aboriginal fire from the human- and land-centered disciplines and suggests that the traditional knowledge of indigenous peoples be incorporated into plans for reintroducing fire to the nation's forests. Stephens et al., 2007 summarizes the literature on fire history and past Native American burning practices to estimate past fire occurrence by vegetation type. MacDonald et al., 2023 examines a confluence of intersecting factors affecting wildfire regimes to conclude that California's wildfire challenges will require multi-faceted and

locally targeted responses in terms of fuel management, human-caused ignitions, building regulations and restrictions, integrative urban and ecosystem planning, and collaboration with Tribes to support the reinvigoration of traditional burning regimes. Davies et al., 2018 develops a social-ecological approach for characterizing fire vulnerability and applies it to more than 70,000 census tracts across the United States, finding that over 29 million Americans live with significant potential for extreme wildfires, a majority of whom are white and socioeconomically secure, but 12 million of which are socially vulnerable and such vulnerability is spread unequally across race and ethnicity. Herrera, 2018 & Kardas-Nelson et al., 2020 describes that farmworkers continue to work during wildfire smoke. Parshley, 2018 discusses the disparate impact of wildfire smoke on people of color. Ramos, 2022 implements tenets of Indigenous research methodologies to explore conceptualization of traditional ecological knowledge and wildlife management with the Yurok Tribe.

As described in Topical Response A, *Scope of Recirculated Partial Draft EIR,* CEQA requires that the Final Recirculated EIR address comments submitted during the public comment period that raise significant environmental issues on the adequacy of the RPDEIR. (PRC Section 21091(d)(2)(B); CEQA Guidelines Section 15088(c).) "The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information or does not explain the relevance of evidence submitted with the comment." (CEQA Guidelines Section 15088(c).) Please refer to the entirety of this Response B.4-14 with respect to those statements the commenter claims are supported by these articles.

With respect to the Journal of Wildlife Management article (Ramos, 2022), cited in the comment, this article relates to wildlife management and does not describe wildfire, or how traditional ecological knowledge should inform wildfire risk analyses. The commenter provides an excerpt from the article stating, "Indigenous communities have often been marginalized in the sciences through research approaches that are not inclusive of their cultures and histories." The intent of this statement in the article is to suggest that scientific research and resulting wildlife management decisions should consider traditional ecological knowledge. The County acknowledges the vital role that indigenous communities have historically played with regards to wildfire management. However, the referenced article does not address that role.

To the extent this comment suggests that CEQA requires the RPDEIR to analyze potential wildfire impacts on specific groups of people, such as migrant workers and indigenous communities, the comment does not cite to any requirement in CEQA to analyze environmental justice impacts in an EIR and provides no evidence that the Project will cause wildfire impacts on the particular communities generally described in the comment, nor does it raise any impacts to cultural or tribal cultural resources. (CEQA Guidelines Section 15131(a) ["Economic or social effects of a project shall not be treated as significant effects on the environment."]) CEQA requires only analysis of physical environmental impacts. (Pub. Res. Code Section 21100(d) ["…[A]ny significant effects on the environment shall be limited to substantial, or potentially substantial, adverse changes in physical conditions…"].) Significant impacts analyzed under CEQA must be related to a physical change in the

environment. (CEQA Guidelines Sections 15382, 15358(b); *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, 576-582 [CEQA does not require an analysis of social impacts]; *Maintain Our Desert Env't v. Town of Apple Valley* (2004) 124 Cal.App.4th 430, 445 ["…[S]ocial, economic and business competition concerns are not relevant to CEQA analysis unless it is demonstrated that those concerns will have a significant effect on the physical environment."] CEQA mandates courts to not interpret CEQA in a manner that imposes "procedural or substantive requirements" beyond those explicitly in the CEQA statute or in the CEQA Guidelines. (Pub. Res. Code Section 21083.1.) Notwithstanding the foregoing, this comment's statements regarding the purportedly disparate impact wildfires may have on specific communities are noted and will be provided to County decisionmakers for their consideration.

While not required to mitigate wildfire impacts to a less than significant level, the Project as part of its Climate Resolve Settlement Agreement obligations will establish a Good Neighbor Firewise Fund that will provide grants to needs-based applicants to aid communities with a population of less than 100,000 within 15 miles of the boundaries of Tejon Ranch to reduce off-site fire risks, increase fire prevention, protection and response measures, and avoid adverse impacts of fire for the Centennial residents and neighboring communities. Per the Settlement Agreement, the Project Applicant/Developer is required to fund the Good Neighbor Firewise Fund in the inflation-adjusted amount of $500,000 annually.

Response B.4-15

This comment states that the RPDEIR fails to adequately disclose, assess, and mitigate the Project's impacts to wildfire risk and creates a false sense of security with inadequate mitigation. The comment claims there is abundant evidence demonstrating that almost all destructive wildfires are ignited by humans or human infrastructure near roads and development. The comment further claims that the RPDEIR improperly focuses on vegetation as "fuels" and avoids acknowledging the primary source of the Project's impacts: putting more people and homes in the area and increasing the risk of wildfire ignition and spread. The comment states that the RPDEIR's focus on existing vegetation on-site also neglects the role of climate change on how fires can spread once they are ignited, their intensity, and their severity. Commenters claim the proposed mitigation is insufficient because they do not guarantee safety when a fire burns though the area. The comment further claims that the RPDEIR's mitigation measures for wildfire impact are improperly deferred, unenforceable, or lack evidence of their effectiveness at reducing impacts to less than significant.

While the Project site will be located in a previously undeveloped area prone to wildfire occurrence, the Project's design, construction type, and multi-layered wildfire risk mitigation measures ensure that wildfire risks are sufficiently mitigated. This finding is further reinforced through the Project's robust analysis of the potential for off-site ignitions provided in Appendix J - Centennial Off-Site Ignition Risk Assessment of the RPDEIR. Based on the site-specific analysis and considering the various input factors for the fire environment, the Project's hazard, ignition risk, and mitigation measures, the overall Project

Wildfire Off-Site Ignition Risk Level is considered to be Moderate. Please refer to Response B.4-13.

The comment states that the Project's mitigation measures do not guarantee safety when a fire burns through an area. CEQA requires the RPDEIR to evaluate and mitigate potential wildfire impacts caused by the Project to a less-than-significant level; CEQA does not require guarantees that a project will have no impact. While the commenter contends that ignition-resistant construction, automatic fire sprinkler systems, fuel management zones, new on-site fire stations, undergrounding of power lines, increased housing density, and the preparation of Fire Protection and Emergency Response Plans are insufficient to reduce wildfire risks, the commenter provides no substantial evidence demonstrating that these measures would be ineffective. Nor does the commenter explain why the Project's comprehensive, multi-layered wildfire protection strategy would fail to reduce wildfire risk. Absent supporting analysis, technical data, or expert opinion, the comment amounts to a disagreement with the RPDEIR's conclusions rather than substantial evidence of a significant impact or inadequacy in the proposed mitigation measures.

The Project includes a comprehensive set of risk reduction and mitigation measures to reduce the Project's wildfire risk to a less-than-significant level. The comment undermines the effectiveness of the California Fire and Building Codes, which have been strategically developed by wildfire safety experts to effectively reduce structure losses from wildfire. Additionally, this comment negates the other 38 risk reduction measures and mitigation measures that will be implemented by the Project to reduce wildfire risk (See Section 7 of the Centennial Wildfire Safety Plan).

The commenter asserts without explanation that the RPDEIR's wildfire mitigation measures are improperly deferred, unenforceable, or unsupported by evidence demonstrating that they would reduce impacts to a less-than-significant level. This assertion is unfounded. An agency may defer the specific details of mitigation to a later date so long as it commits to the measure and identifies clear performance standards against which to measure the success of the measure. (*Sacramento Old City Assn. v. City Council of Sacramento* (1991) 229 Cal.App.3d 1011; CEQA Guidelines Section 15126.4(a)(1)(B).) The Project's mitigation measures regarding wildfire meet these standards and include performance standards that are legally required. The Project's mitigation measures are enforceable through the Mitigation Monitoring and Reporting Program (MMRP), which identifies the entities responsible for implementation, monitoring, and compliance verification. Although the commenter contends that the Project's multi-layered approach to wildfire protection is inadequate, the commenter does not identify any specific deficiencies in the proposed measures or suggest additional feasible measures that should be incorporated. Accordingly, the comment provides no substantial evidence demonstrating that the Project's wildfire mitigation strategy is ineffective or inadequate.

To clarify the regulatory requirements applicable to the Emergency Response Plan, MM WILD-5 is revised as follows. Added text is shown in underline.

MM WILD-5 **Operational Emergency Response Enforcement.** The Project Applicant/Developer shall submit the Emergency Response Plan required by MM 3-7 to the Fire Department and/or County Sheriff's Department and California Department of Forestry and Fire Protection for review and approval. The Emergency Response Plan shall demonstrate compliance with California WUI access standards (Chapter 4 Section 403) and County Fire Code requirements, utilize existing information from Los Angeles County Office of Emergency Management, coordinate with County emergency planners, and provide site specific procedures for various emergency situations including wildfire. The Property CC&Rs shall require future residential and commercial property owners associations to develop and implement an emergency preparation and response plan, including shelter-in-place and evacuation plans as well as first aid and emergency electric power supplies.

The comment cites various newspaper and journal articles as support for commenter's assertions, including:

- The comment cites Balch et al., 2024 but this document is not provided.
- Environmental Research Letters article investigating the spatial distribution of contemporary wildfire ignitions in California. (Chen & Jin, 2022.)
- Global Environmental Change article summarizing a modeling framework study to compare the importance of climatic and human variables for explaining fire patterns and structure loss. (Syphard, Rustigian-Romsos, 2019.)

These articles provide general information regarding factors influencing fire ignition. These articles do not raise any specific environmental issues or deficiency in the RPDEIR analysis. Chen & Jin, 2022 investigated the spatial distribution of contemporary wildfire ignitions in California, using a machine model to examine the complex relationships between ignitions and a suite of environmental co-variates, including human settlement, climate, fuels, and topographical variables, with the goal of providing guidance on prioritizing where and which fire management strategies may be pursued. Syphard, Rustigian-Romsos, 2019 developed a modeling framework to compare the importance of climatic and human variables for explaining fire patterns and structure loss for three diverse California landscapes. CEQA requires that the Final Recirculated EIR address comments submitted during the public comment period that raise significant environmental issues on the adequacy of the RPDEIR. (PRC Section 21091(d)(2)(B); CEQA Guidelines Section 15088(c).) "The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information or does not explain the relevance of evidence submitted with the comment."

(CEQA Guidelines Section 15088(c).) Please refer to the entirety of this Response B.4-15 with respect to those statements the commenter claims are supported by these articles.

Further, none of these articles link modern master-planned and ignition-resistant communities with an increase in wildfire ignitions. For example, Syphard, Rustigian-Romsos, et al. 2019 describe, "although urban expansion increases fire frequency in general, the highest hazard tends to be in low-density housing areas, where structures are interspersed with wildland vegetation." While the authors also note that there may be situations where high housing density contributes to fire spread, this is largely dependent on structure flammability and building construction (Spyratos et al., 2007). Further, Syphard, Rustigian-Romsos, et al. 2019 states: "Contrary to what might be expected, fire activity is not highest where population is highest. Instead fire frequency, and to a lesser extent, area burned, tend to peak at low- to intermediate population and housing density (citations omitted); this relationship has also been observed in other areas across the globe (citations omitted). This hump-based relationship reflects, in part the increased ignitions in rural and residential areas (compared to wildlands), balanced against lower potential for fire spread and/or greater suppression in urban areas (citations omitted)."

Response B.4-16

The comment states that electrical transmission lines are not the only source of ignitions and describes other types of infrastructure and human activities that have sparked destructive wildfires. The comment claims there is no basis for the RPDEIR to rely on undergrounding powerlines to mitigate the risk of wildfire ignitions to less than significant.

The comment incorrectly implies that the RPDEIR's conclusions regarding wildfire impacts is based solely on the undergrounding of electrical transmission facilities. The RPDEIR does not conclude that wildfire risks are reduced to a less-than-significant level exclusively through undergrounding, nor does it rely on underground utilities as the sole wildfire mitigation measure. Rather, the Project incorporates a comprehensive, multi-layered wildfire prevention, ignition reduction, and fire protection strategy that addresses both the potential for wildfire ignition and the consequences of wildfire exposure.

While undergrounding electrical distribution and transmission facilities is an important component of the Project's wildfire risk reduction strategy because it substantially reduces the potential for ignition associated with overhead electrical lines, the RPDEIR recognizes that wildfire ignitions can originate from a variety of sources. As noted by the commenter, wildfires may be caused by equipment failures, vehicles, arson, human activities, accidents, and other ignition sources. The RPDEIR does not dispute this fact. Instead, the environmental analysis evaluates wildfire risk in the context of the Project's overall fire protection program and multiple layers of ignition risk reduction as listed in Table 2.3-17 of the RPDEIR. Please refer also to Responses B.4-13 and B.4-15.

Response B.4-17

The comment states that conformance to building codes cannot make structures safe or communities fireproof and development in and near fire-prone areas should be avoided. The comment further states that mitigation measures should require ember-resistant vents, fire-resistant roofs, fire resistant siding, multi-paned windows, and irrigated defensible spaces immediately adjacent to structures and around communities. The comment further recommends external sprinklers to reduce structures' flammability and rooftop solar and clean energy microgrids to reduce fire risk from utility infrastructure during extreme weather. The comment also states that mitigation measures should include retrofitting existing nearby communities and providing existing nearby communities with personal protective equipment (*e.g.*, N95 masks, air purifiers), and shelter-in-place facilities. The comment states the Project should fully fund in perpetuity fire education and awareness for workers, new residents, and nearby communities and maintenance and enforcement of ignition reduction measures. Finally, the comment states that the Project developer should be responsible for the insurability of homes and structures and recovery and remediation costs when a fire occurs in or near the Project area.

As background for this response, under CEQA, mitigation measures must reduce the severity of potentially significant impacts, their effectiveness must be clear, and they must be enforceable (State CEQA Guidelines Section 15126.4(a)). Mitigation must also be feasible. CEQA defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors (State CEQA Guidelines Section 15364). If a suggested mitigation measure does not reduce the severity of a potentially significant impact, is not effective, is not enforceable, or is not feasible, the agency may decline to impose it.

Regarding the claim that building code conformance cannot make structures safe or communities fireproof, as stated in Response B.4-15, CEQA requires the RPDEIR to evaluate and mitigate potential wildfire impacts caused by the Project to a less-than-significant level; CEQA does not require guarantees that a project will have no impacts. Please also refer to Responses B.4-13 and B.4-15.

Regarding the recommendation for ember-resistant vents, fire-resistant roofs, fire resistant siding, multi-paned windows, and irrigated defensible spaces immediately adjacent to structures, as stated in the RPDEIR and Wildfire Safety Plan, these design features will be implemented as required in Chapter 5 of the California Wildland-Urban Interface Code (CWUIC) and the Los Angeles County Residential Code, Section R327. Please also refer to Responses B.4-13 and B.4-15.

Regarding the recommendation for external sprinklers to reduce structures' flammability, external sprinkler systems have been widely debated by fire safety experts and there is limited rigorous research on their real-world effectiveness. Before widespread adoption, key uncertainties about their reliability as a wildfire defense strategy must be addressed through further study. For example, significant questions remain about the effectiveness of external sprinkler systems during high-intensity wildfire conditions, especially regarding how strong

winds impact water coverage and increase evaporation rates. (IBHS, 2024). Please also refer to Responses B.4-13 and B.4-15.

Regarding the statement that rooftop solar and clean energy microgrids could reduce fire risk from utilities' infrastructure during extreme conditions, the Project supports development of rooftop solar and clean energy microgrids, which will be authorized land uses within the Centennial Specific Plan. The RPDEIR analysis evaluates wildfire risk, including risk from utilities' infrastructure, in the context of the Project's overall fire protection program and multiple layers of ignition risk reduction as listed in Table 2.3-17 of the RPDEIR. The analysis determined such impacts will be less than significant with implementation of mitigation measures and compliance with regulatory requirements. Please also refer to Response B.4-16.

Regarding the suggestion that the Project mitigation measures should include retrofitting existing communities near the Project area with fire resilient measures and providing such communities with personal protection equipment, CEQA requires a Project to evaluate and mitigate significant impacts that are caused by the Project. CEQA does not require a Project to mitigate risks associated with existing conditions or to mitigate impacts that are caused by other projects. The RPDEIR includes a robust analysis of the potential for off-site ignitions provided in Appendix J - *Centennial Off-Site Ignition Risk Assessment*. Based on the site-specific analysis and considering the various input factors for the fire environment, the Project's hazard, ignition risk and mitigation measures, the overall Project Wildfire Off-Site Ignition Risk Level is considered to be Moderate. Although located within a Very High FHSZ, the Project achieves the lowest possible ignition risk score for this FHSZ by fully complying with all applicable safety regulations and incorporating additional mitigation measures beyond the minimum requirements. (See RPDEIR, p. 2.3-104.) The RPDEIR determined that potential impacts to people and property regarding ignition risk from the Project are minimized and represent a less than significant impact. (RPDEIR, p. 2.3-105.) Thus, additional mitigation measures are not warranted. Further, the cost to retrofit entire existing communities would range depending on the measures implemented but could quickly escalate to be infeasible. (See RF1 Home Hardening Guide, https://readyfireone.com/learn/home-hardending-what-works [ember-resistant vents estimated at $1,500–$4,500 per home, Zone 0 clearance estimated at $500–$3,000 per home, fence breaks estimated at $200–$1,000 per home, enclosed eaves estimated at $2,000–$8,000 per home, double-paned or tempered windows estimated at $10,000–$30,000 per home, noncombustible siding estimated at $15,000–$40,000+ per home, roof replacement estimated at $15,000–$30,000+ per home, deck sealing/rebuilding estimated at $1,000–$15,000 per home.].)

Separately, Centennial is required as part of the Settlement Agreement with Climate Resolve to establish a Good Neighbor Firewise Fund of an inflation-adjusted $500,000 annually, which will provide grants to need-based applicants to aid communities with a population of less than 100,000 located within 15 miles of the boundaries of Tejon Ranch in order to reduce off-site fire risks and increase fire prevention, protection and response capabilities.

This fund is not mitigation under CEQA, but rather a separate agreement with other parties. The Settlement Agreement authorizes the fund to award grants for the following activities:

- Updating planning documents and zoning ordinances, including general plans, community plans, specific plans, local hazard mitigation plans, community wildfire protection plans, climate adaptation plans, and local coastal programs to protect against the impacts of wildfires;
- Developing and adopting a comprehensive retrofit strategy;
- Funding fire-hardening retrofits of residential units and other buildings;
- Reviewing and updating the local designation of lands within the jurisdiction as very high fire hazard severity zones;
- Implementing wildfire risk reduction standards, including development and adoption of any appropriate local ordinances, rules, or regulations;
- Establishing and initial funding of an enforcement program for fuel and vegetation management;
- Performing infrastructure planning, including for access roads, water supplies providing fire protection, or other public facilities necessary to support the wildfire risk reduction standards;
- Partnering with other local entities to implement wildfire risk reduction;
- Updating local planning processes to otherwise support wildfire risk reduction;
- Completing any environmental review associated with the listed activities;
- Covering the costs of temporary staffing or consulting needs associated with the listed activities;
- Implementing community-scale risk reduction programs to become Firewise USA sites;
- Implementing resiliency plans such as resiliency centers with stable electricity supplies (e.g., microgrid, solar, and battery equipment) available to residents during times of power shutdowns or other emergencies; and
- Other fire-related risk-reduction activities that may be approved by the Centennial Monitoring Group (CMG) Board.

Regarding the suggestion that the Project proponent should fully fund, in perpetuity, education and awareness programs for workers, new residents, and nearby communities regarding wildfire hazards and methods to reduce ignition risk, this is already a requirement. As described in the RPDEIR, the Project's Homeowners Association (HOA) would fund and implement a Wildfire Education Program that provides residents and occupants with ongoing education regarding wildfire preparedness, prevention, and response, consistent with the Wildfire Safety Plan and Evacuation Plan. (RPDEIR App. G, Wildfire Safety Plan, Sections 6.1 and 7.2.1.) This educational program is intended to support the community's

fire safety features, emergency procedures, and evacuation planning. Further, MM WILD-5 requires the Project CC&Rs to require future residential and commercial property owners' associations to develop and implement an emergency preparation and response plan, including shelter-in-place and evacuation plans as well as first aid and emergency electric power supplies.

Lastly, the comment suggests that the Project developer should be responsible for the insurability of homes and structures as well as recovery and remediation costs if a fire occurs in or near the Project area. While fire insurance is an important policy concern in California, it is not a topic that requires analysis under CEQA. Such matters concern the allocation of financial risk, insurance availability, and potential legal liability rather than the identification, analysis, or mitigation of physical environmental impacts. Economic or social effects of a project are not treated as significant effects on the environment under CEQA. (CEQA Guidelines Section 15131(a).) See Responses B.4-14 and B.4-25.

The comment cites two journal articles as support for commenter's assertions, including:

- Global Environmental Change article regarding climatic and human variables for explaining fire patterns and structure loss. (Syphard, Rustigian-Romsos, 2019.)
- Fire Ecology journal article regarding housing arrangement and vegetation factors associated with single-family home survival in the 2018 Camp Fire. (Knapp, 2021.)

These articles provide general information regarding factors influencing structure loss during fires. These articles do not raise any specific environmental issues, project-site specific impacts, or deficiency in the RPDEIR analysis. Specifically, Syphard, Rustigian-Romsos, 2019 developed a modeling framework to compare the importance of climatic and human variables for explaining fire patterns and structure loss for three diverse California landscapes. Knapp et al., 2021 randomly sampled single-family homes in the Camp Fire and determined that homes constructed prior to 1997 fared poorly (11.5% surviving), compared with 37% survival for homes built between 1997 and adoption of Chapter 7A, and 44% survival for homes built after adoption of Chapter 7A. The article found that most fire damage to surviving homes appeared to result from radiant heat from nearby burning structures or flame impingement from the ignition of near-home combustible materials and concluded that strong associations between both distance to nearest structure and vegetation within 100 meters and home survival in the Camp fire indicate building and vegetation modifications are possible that would substantially improve outcomes. Among those include improvements to windows and siding in closest proximity to neighboring structures, treatment of wildland fuels, and eliminating near-home combustibles, especially in areas closest to the home. CEQA requires that the Final Recirculated EIR address comments submitted during the public comment period that raise significant environmental issues on the adequacy of the RPDEIR. (PRC Section 21091(d)(2)(B); CEQA Guidelines Section 15088(c).) "The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information or does not explain the relevance of evidence

submitted with the comment." (CEQA Guidelines Section 15088(c).) Please refer to the entirety of this Response B.4-17 with respect to those statements the commenter claims are supported by these articles.

Further, the Fire Ecology article (Knapp, 2021) overlooks a critical factor influencing outcomes regarding the role of building codes with respect to the likelihood of home survival: the construction type of adjacent structures. The study highlighted that the majority of fire damage to surviving homes appeared to be caused by radiant heat from nearby burning structures or direct flame contact from ignited combustible materials near the home. When asked about these findings, co-author Yana Valachovic stated, "This research suggests a strong neighborhood effect, where the condition and proximity of an outbuilding or a neighbor's home can have a significant influence on a building's survival given the radiant heat exposure from a neighboring building burning (Kan-Rice, 2022)".

One of the primary threats to home survival is radiant heat from nearby burning structures. Even with ember-resistant features mandated by Chapter 5 of the California Wildland-Urban Interface Code (CWUIC), intense radiant heat can break windows and ignite interiors. Therefore, the benefits of Chapter 5 of the CWUIC construction increase dramatically when a structure and the directly adjacent structures are all constructed to Chapter 5 CWUIC requirements, which would be the case for the new Centennial community.

As stated in the RPDEIR, fire risk and the potential for structure loss are extremely low when homes are built as part of a properly planned and mitigated master-planned community. (FEMA, 2023.) According to the Office of the State Fire Marshal (OSFM) Property Loss Data, no master-planned community built after the adoption of Chapter 5 CWUIC (formerly California Building Code Chapter 7A) has been reported as having suffered extensive structural losses. While Knapp et al. (2021) assess structure survivability based on building construction, they do not consider the fire resistance of nearby structures and the resulting impact on structural loss.

In addition, the article also highlighted that structure loss was commonly caused by direct flame contact from ignited combustible materials near the home. Further, the article concluded that higher structural survival was noted with lower canopy cover within 0–30 m of newer homes. This emphasizes the importance of a multi-layered approach to fire safety, which includes adequate defensible space in tandem with fire-resistant building construction. As stated in the RPDEIR, Centennial will require ignition-resistant landscaping throughout the entirety of the Project site. This includes the addition of a Zone 0 noncombustible zone, when adopted, which is expected to require that no combustible materials are located within 0–5 feet of structures. Please refer also to Responses B.4-13 and B.4-15.

Response B.4-18

The comment states that the Project fuel management plan is insufficient, fails to follow the best available science, and could do more harm than good. The comment claims that defensible space more than 100 feet from structures does not provide additional protection

from fire. The comment further suggests that the first five feet immediately adjacent to structures has been found to be the most critical to remove combustibles, but that vegetation is not the main driver and instead wooden decks and fences, log piles, and garbage bins are fire hazards near structures. The comment states that removing and thinning native vegetation and structure hardening may improve community wildfire resilience, but it does not guarantee safety from fire, and removal of native vegetation near homes in the name of defensible space could lead to establishment of invasive grasses that are even more flammable and destroys and degrades habitats that many sensitive species rely on.

The comment mischaracterizes the basis of the proposed Fuel Modification Zones (FMZs). The FMZs are not arbitrary distances but are designed to comply with Los Angeles County Fire Department (LACoFD) requirements and applicable fire protection standards for development in Fire Hazard Severity Zones. These standards are intended to provide defensible space, prevent off-site ignitions, facilitate firefighter access and operations, and reduce wildfire risk to structures and occupants.

The comment overlooks the comprehensive wildfire protection strategy proposed for the Project. The Project will not rely solely on vegetation management for fire safety. All structures will be designed and constructed in compliance with applicable CWUIC requirements for wildfire-prone areas, including ignition-resistant construction measures and other structure-hardening features intended to reduce vulnerability to ember intrusion and radiant heat exposure.

While the comment notes that combustible materials such as wooden decks, fences, storage piles, and similar features can contribute to structure loss, these observations do not undermine the need for FMZs. Rather, they support the use of a layered fire protection approach that combines defensible space, fuel management, ignition-resistant construction, and ongoing maintenance. The Project incorporates these measures collectively, consistent with current fire protection practices and regulatory requirements.

Furthermore, the FMZs will be actively maintained to prevent the colonization and spread of invasive vegetation. Planting and maintenance within the FMZs will be conducted in accordance with LACoFD requirements and the County-approved plant palettes applicable to fuel modification areas. Maintenance activities will include monitoring and removal of invasive species and management of vegetation to promote compliance with fuel modification requirements while reducing the potential for establishment of highly flammable weed species.

The comment's conclusion that the proposed Fuel Management Plan is inconsistent with the "best available science" is unsupported and assumes that the regulatory framework governing wildfire protection does not reflect current scientific understanding. The Project's fuel modification program is based on LACoFD requirements and is implemented in conjunction with numerous state-mandated wildfire protection measures, including Zone 0 when effective, defensible space requirements, and ignition-resistant construction standards specifically developed to address the primary causes of structure ignition during wildfires. These established regulatory requirements were adopted in response to decades

of wildfire research and post-fire investigations and are consistent with the best available science.

The comment cites various newspaper and journal articles as support for commenter's assertions, including:

- International Journal of Wildland Fire article regarding the role of defensible space for residential structure protection during wildfires. (Syphard et al., 2014.)
- Global Environmental Change article regarding climatic and human variables for explaining fire patterns and structure loss. (Syphard, Rustigian-Romsos, 2019.)
- Fire Ecology journal article regarding housing arrangement and vegetation factors associated with single-family home survival in the 2018 Camp Fire. (Knapp, 2021.)
- Journal of Environmental Management article regarding use of high-resolution land cover data to assess structure loss in the 2018 Woolsey Fire. (Mockrin, 2023.)
- Master of Science in Forestry Sciences thesis regarding factors leading to structure loss on the Thomas Fire. (Uribe, 2021.)
- Nature Communications article regarding fire risk to structures in California's wildland-urban interface. (Zamanialaei, 2025.)
- Landscape and Urban Planning article regarding urban vegetation type and defensible space's role in building loss during wildfire-driven events in California. (Escobedo, 2025.)
- Los Angeles Times article regarding California's proposed ban on plants near homes could be dangerously bad advice. (Moritz, 2025.)
- Frontiers in Ecology and the Environment article regarding the human-grass-fire cycle and how people and invasives co-occur to drive fire regimes. (Fusco et al., 2022.)
- Diversity and Distributions journal article regarding drivers of chaparral type conversion to herbaceous vegetation in coastal Southern California. (Syphard, Brennan, et al., 2018.)
- The comment cites Syphard et al., 2018 but this reference is not provided.

These articles provide general information regarding factors influencing structure loss during fires. These articles do not raise any specific environmental issues or deficiency in the RPDEIR analysis. Specifically, Syphard et al., 2014 shows a clear role for defensible space up to 100 feet and less so for larger defensible spaces, while also recognizing that additional distance may be necessary to provide sufficient protection to firefighters. Mockrin, 2023 finds that building materials (particularly multi-paned windows and enclosed eaves) and landscape features such as paved land per parcel, elevation, building density, and distance to road networks were stronger predictors of building-level damage outcomes as compared to vegetation around buildings. Uribe, 2021 utilized GIS software to determine that fence type (noncombustible, combustible, or none) is a more significant factor at decreasing the odds of structure loss than defensible space. Uribe recommends mitigation strategies that

reflect the community in which they are implemented and states; "This does not suggest that defensible space is ineffective or should be ignored. Indeed, we found that irrigated landscaping within the 30m buffer zone and non-burnable landcover in both the 1.5m and 30m zones is significant at promoting structural survivability." Zamanialaei, 2025 utilized machine-learning analysis of post-fire data collection, remotely sensed data, and fire reconstruction modeling for five fires, to conclude that spacing between structures is a critical factor influencing fire risk. Zamanialaei concluded: "While hardening and defensible space actions may not alter the fundamental risks posed by structure proximity, they can still dramatically improve the survivability of buildings during wildfires." Escobedo, 2025 finds a trade-off between "the use of well-maintained urban vegetation types near homes for climate regulation, aesthetics, and human well-being versus the increased risk of wildfire and home ignition due to increased fuels adjacent to homes" and documents that tree, shrub, and herbaceous moisture in yards are better predictors of building loss – or survival – than just percent cover vegetation cover alone. Fusco et al., 2022 outlines a new human-grass-fire cycle framework, suggests research directions to address the role people play in perpetuating invasive grass fires, and suggests a framework for management strategies that encourage fire and invasive species management communities to combine knowledge to mitigate impacts. Syphard, Brennan, et al., 2018 do not address fuel modification zones at all, concluding that short-interval fire is a critical mechanism contributing to shrubland extirpation and landscape disturbances, such as trail construction, provide the means for herbaceous species to colonize open areas. Please refer to Response B.4-13 regarding Syphard, Rustigian-Romsos, 2019 and Response B.4-17 regarding Knapp et al., 2021.

CEQA requires that the Final Recirculated EIR address comments submitted during the public comment period that raise significant environmental issues on the adequacy of the RPDEIR. (PRC Section 21091(d)(2)(B); CEQA Guidelines Section 15088(c).) "The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment." (CEQA Guidelines Section 15088(c).) Please refer to the entirety of this Response B.4-18 with respect to those statements the commenter claims are supported by these articles.

Please also refer to Responses B.4-13 through B.4-17.

Response B.4-19

The comment states that the RPDEIR incorrectly asserts that clustered planned development is not associated with increased wildfire risk. The comment states that once structures ignite, higher density development is at greatest risk. The comment claims researchers and past fire experiences have found that structure density was by far the strongest predictor of structure loss, where structures in denser areas were more likely to be destroyed. The comment claims that expanding the WUI deeper into fire-prone areas, regardless of density, increases ignition risk and "adds fuel to the fire."

Please refer to Responses B.4-13, B.4-15, and B.4-17. As described below, the comment overstates the relationship between development density and wildfire risk and fails to distinguish between older, vulnerable building stock and new development constructed in accordance with modern wildfire protection standards. As a result, the comment does not support the conclusion that the Project's clustered development pattern will inherently result in increased wildfire risk.

The comment cites various newspaper and journal articles as support for commenter's assertions, including:

- PNAS Opinion commentary regarding wildland-urban fires not being a wildfire problem, but an urban fire problem. (Calkin et al., 2023.)
- Fire Ecology journal article regarding housing arrangement and vegetation factors associated with single-family home survival in the 2018 Camp Fire. (Knapp et al., 2021.)
- Fremontia magazine article regarding structure burning in California. (Syphard and Keeley, 2020.)
- Urban Forestry & Urban Greening journal article regarding urban trees and structure loss in the 2025 Eaton and Palisades fires. (Keely et al., 2026.)
- International Journal of Disaster Risk Reduction article regarding increasing wildfires and changing socio-demographics in communities across California. (Yadav et al., 2023.)

These articles provide general information regarding factors influencing structure loss during fires. These articles do not raise any specific environmental issues or deficiency in the RPDEIR analysis. Calkin et al., 2023 does not address housing density. Instead, the commentary argues that new construction siting, design, construction materials, and landscaping requirements should take wildfire into account, stating: "The best way to make existing wildfire-vulnerable developments ignition resistant is to work within the limited area of the 'home ignition zone'—a home and its surroundings within 100 feet (which may include neighboring homes). There are ways to reduce home ignition risk. Homeowners should install nonignitable roofing materials and flame- and ember-resistant vents; clean gutters of flammable debris; ensure that wooden steps, fences, and decks do not directly contact a home's flammable materials; and remove flammable materials immediately surrounding buildings and under attached decks." Knapp et al., 2021 randomly sampled single-family homes in the Camp Fire and determined that homes constructed prior to 1997 fared poorly (11.5% surviving), compared with 37% survival for homes built between 1997 and adoption of Chapter 7A, and 44% survival for homes built after adoption of Chapter 7A. The article found that most fire damage to surviving homes appeared to result from radiant heat from nearby burning structures or flame impingement from the ignition of near-home combustible materials and concluded that strong associations between both distance to nearest structure and vegetation within 100 meters and home survival in the Camp fire indicate building and vegetation modifications are possible that would substantially improve outcomes. Among those include improvements to windows and siding in closest proximity

to neighboring structures, treatment of wildland fuels, and eliminating near-home combustibles, especially in areas closest to the home. Keely et al., 2026 analyzed patterns of structure density, urban canopy, and near-structure vegetation using CAL FIRE damage assessments, building footprint data, and high-resolution mapping of urban canopy and landcover, concluding that patterns of building density and arrangement play a far greater role in structure loss than spatial distribution of urban vegetation and policies calling for the removal of urban canopy should be approached with caution and be supported by further research. "While canopy density was the second most important predictor of structure loss in both fires, it had opposite association in the two fires. In the Eaton fire, structures in areas of higher canopy density were more likely to be lost, whereas in the Palisades fire, structures in high canopy density were less likely to be lost." Lastly, Yadav et al., 2023 found that higher income, Whites, renters, Hispanics, Asian Americans and urban areas were statistically and increasingly being more affected statewide by wildfire.

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While the cited studies identify correlations between structure density and structure loss in past wildfire events, they generally evaluate existing development patterns and structures exposed to wildfire, not entire communities designed and constructed in compliance with current California wildfire building standards. Importantly, the studies cited by the commenter do not demonstrate that higher-density development built with modern ignition-resistant construction standards experiences the same vulnerability as older communities that were developed prior to adoption of current Wildland-Urban Interface (WUI) building requirements.

Notably, the comment cites studies concluding that structures in denser areas are more likely to be lost once structural ignitions occur. However, those findings do not establish that clustered development designed to modern ignition-resistant standards presents the same risk. To the contrary, if structure-to-structure fire spread is a primary concern, then the relevance of ignition-resistant construction becomes even greater because these measures are intended specifically to reduce the probability that a structure will ignite from embers, radiant heat, or exposure to nearby burning structures. The comment relies on post-fire observations from communities that largely consisted of structures built under older construction standards without demonstrating that similar outcomes would occur in a newly constructed community designed to comply with current WUI fire protection requirements.

In addition, the comment further assumes that increasing structure density necessarily increases wildfire losses, but this reasoning overlooks a critical prerequisite for structure-

to-structure fire spread: an initial structural ignition. Structure conflagration risk is a function of both the probability that a structure ignites and the potential for fire to spread to neighboring buildings. The Project incorporates modern ignition-resistant construction requirements specifically intended to reduce the likelihood that a structure will ignite from embers, radiant heat, or direct flame contact during wildfire. As a result, the probability of an initial structural ignition occurring is expected to be substantially lower than in many of the communities evaluated in the studies cited by the commenter.

Because the cited studies do not analyze a community constructed in accordance with today's wildfire-resilient standards, they do not provide substantial evidence, and there is none, that the Project's clustered development pattern will result in increased wildfire risk or structure loss. Rather, the Project's compliance with current ignition-resistant construction requirements and LACoFD fire protection standards is specifically intended to address the vulnerabilities identified in the studies cited.

The Project would be constructed as a unified, master-planned community in which all homes and directly adjacent structures are required to comply with applicable ignition-resistant construction standards defined in the California Wildland-Urban Interface Code. This community-wide approach is important because wildfire damage to otherwise surviving homes is often caused by radiant heat from nearby burning structures or direct flame contact with combustible materials near the home. Knapp et al., 2021 found that these neighborhood conditions can materially affect a structure's likelihood of survival. Accordingly, constructing the Project uniformly to ignition-resistant standards will substantially reduce the potential for structure-to-structure fire spread and improve the overall fire safety of the community. As stated in the RPDEIR, the risk of wildfire-related structure loss is extremely low in properly planned and mitigated master-planned communities. (FEMA, 2023.) Consistent with this conclusion, Office of the State Fire Marshal property-loss data indicates that no master-planned community constructed after adoption of California Building Code Chapter 7A has been reported to have experienced extensive structural losses. (California Building Industry Association (CBIA), 2022. Analysis of State Fire Marshall Property Loss Data.)

Response B.4-20

The comment states that the Project should be required to fund operating and fire department personnel costs, in addition to providing three and up to four fully equipped fire stations on the Project site.

The comment does not identify any "new significant information" that would require recirculation pursuant to CEQA Guidelines Section 15088.5(a). As explained in Response B.4-1, additional environmental review is required only where new information demonstrates that the Project would cause a new significant environmental effect or a substantial increase in the severity of a significant effect previously analyzed. For informational purposes, the Project will construct fully equipped fire stations with design and oversight from the Los Angeles County Fire Department. (Mitigation Measures 16-1, 16-2, 16-3.) If the Project is approved, three stations are guaranteed to be built, with a fourth

station being triggered if any homes fall outside of a 5-minute response time. The Los Angeles County Fire Department has final approval on the number of stations and location and has indicated that the proposed fire stations on the site would provide adequate fire service to the Project. (Draft EIR, pp. 5.16-1.) The Project Applicant/Developer would construct fire protection facilities in lieu of paying established developer fees at the time of building permit issuance. (Draft EIR, p. 5.16-2 and 5.16-12 through 5.16-16.) The proposed fire stations on the site would be staffed by a minimum four-person engine company. (*Id.*) Property tax revenues, which would increase annually as the Project is built out over time, would provide funds for the operation and staffing of the fire stations. (*Id.*) Implementation of MMs 16-1 through 16-3 would provide for fire station sites, construction of the fire stations, and funding for fire protection apparatus/equipment to serve the Project. (*Id.*) Therefore, impacts on fire services will be reduced to less than significant. (*Id.*)

The Los Angeles County Fire Department is a special district. Revenue streams are separate and distinct from the Los Angeles County General Fund. Under federal and state Constitutional principles and California state law, including the Mitigation Fee Act (Govt. Code Section 66000 *et seq.*), fire districts may raise funds for capital improvements (such as fire stations and equipment) through development project conditions or a development impact fee developed in compliance with the Mitigation Fee Act. Development impact fees may not include the costs attributable to existing deficiencies in public facilities but may include the costs attributable to the increased demand for public facilities reasonably related to the development project. With respect to staff salaries, the primary method for a fire district to obtain revenue for staff salaries is through property tax allocations through the County assessor or special taxes and assessments. The homes and businesses that would be constructed by the Project will generate new tax revenue to fund ongoing operational and personnel costs for fire protection services.

The comment cites various newspaper and journal articles as support for commenter's assertions, including:

- New York Times article regarding fire resources challenges during the 2025 Los Angeles fires. (Fuller et al., 2025.)
- Los Angeles Times article regarding fire resources challenges during the 2025 Los Angeles Fires. (Toohey & Fry, 2025.)
- Environmental Research Letters article regarding increasing likelihood of extreme autumn wildfire conditions across California due to climate change. (Goss et al., 2020.)
- Advancing Earth and Space Science Geophysical Research Letters article regarding shorter, sharper rainy season amplifying California wildfire risk. (Swain, 2021.)
- Nature Climate Change article regarding increasing precipitation volatility in 21st century California. (Swain, et al., 2018.)
- Nature Reviews Earth & Environment article regarding hydroclimate volatility on a warming earth. (Swain et al., 2025.)

These articles provide general information regarding funding for fire suppression and the effects of climate change on wildfire. These articles do not raise any specific environmental issues or deficiency in the RPDEIR analysis. Specifically, Fuller et al., 2025 and Toohey & Fry, 2025 discuss that Los Angeles County fire personnel and water resources were strained during the 2025 Los Angeles wildfires. Goss et al., 2020 describes that its climate model analysis suggests that continued climate change will further amplify the number of days with extreme fire weather by the end of the century, though a pathway consistent with the UN Paris commitments would substantially curb that increase. Swain, 2021 describes that precipitation observed shifts of delayed and sharper rainy seasons between 1960 and 2019 increase the degree of temporal overlap between extremely dry vegetation conditions and fire-promoting downslope winds in late autumn, which is consistent with climate model projections. Swain et al., 2018 describes use of climate model simulations to project increases in extreme dry-to-wet precipitation that would seriously challenge California's existing water storage, conveyance, and flood control infrastructure. Swain et al., 2025 describes expectations that ongoing anthropogenic warming will continue to increase hydroclimate volatility.

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Response B.4-21

The comment states that the RPDEIR does not adequately account for the impacts of climate change in the proposed wildfire mitigation measures. The comment describes that climate change is expected to make it easier for wildfires to ignite and spread, increase the number of days with extreme weather conditions, and result in more intense fires and fires that spread faster. The comment states that the RPDEIR neglects the fact that climate change is amplifying extreme fire weather and that almost all destructive wildfires are ignited by humans or human infrastructure, not the vegetation itself.

Contrary to the commenter's statements, the RPDEIR recognizes and discusses the relationship between climate change and wildfire conditions. As described in Section 2.3, *Wildfire*, the RPDEIR references the State of California's Fourth Climate Change Assessment and discusses projected increases in temperature, changes in precipitation patterns, prolonged drought conditions, reduced snowpack, and other climate-related factors such as increased extreme weather that may contribute to increased wildfire susceptibility throughout California and the Los Angeles Region. (RPDEIR, p. 2.3-24 and 2.3-95; see also

RPDEIR, App. G, Wildfire Safety Plan Section 2.2.1.1.) The RPDEIR specifically acknowledges that climate change is expected to influence wildfire conditions through higher temperatures, longer dry seasons, and changes in vegetation and fuel conditions that can contribute to increased wildfire risk. (*Id.*) Please also refer to Response B.4-13.

The Project's wildfire analysis and fire protection measures were developed specifically to account for severe fire weather conditions and the potential effects of a changing climate. Fire behavior modeling conducted for the Project evaluated wildfire behavior under extreme Santa Ana weather and fuel conditions rather than average conditions. Similarly, the Project's fuel modification program, defensible space requirements, emergency access design, water supply provisions, fire-flow requirements, vegetation management requirements, ignition-resistant construction features, and other fire protection measures are intended to provide resiliency under elevated wildfire hazard conditions, including those that may become more prevalent as regional temperatures increase and fire seasons lengthen.

The comment cites various newspaper and journal articles as support for commenter's assertions, including:

- The comment cites Barnes et al., 2025 but this document is not provided.
- Advancing Earth and Space Science article regarding observed impacts of anthropogenic climate change on wildfire in California. (Williams et al., 2019.)
- Environmental Research Letters article regarding increasing likelihood of extreme autumn wildfire conditions across California due to climate change. (Goss et al., 2020.)
- Communications Earth & Environment article regarding the season for large fires in southern California is projected to lengthen in a changing climate. (Dong et al., 2022.)
- Advancing Earth and Space Science article regarding a later onset of the rainy season in California. (Luković, 2021.)
- Biogeosciences article regarding assessing climate change impacts on live fuel moisture and wildfire risk using a hydrodynamic vegetation model. (Ma et al., 2021.)
- Science Advances article regarding anthropogenic warming driving earlier wildfire season onset in California. (Madakumbura, Moritz, et al., 2025.)
- UCLA report regarding climate change as a factor in the Los Angeles fires. (Madakumbura, Thackeray et al,. 2025.)
- Advancing Earth and Space Science Geophysical Research Letters article regarding shorter, sharper rainy season amplifying California wildfire risk. (Swain, 2021.)
- International Journal of Wildland fire article regarding drivers of California's changing wildfires. (MacDonald et al., 2023.)
- The comment cites Balch et al., 2024 but this document is not provided.

- KTLA news article regarding the Ridge Fire that ignited near the 39000 block of Gorman Post Road. (Ferrara, 2026.)
- Los Angeles Times article regarding lifting of evacuation orders for the Ridge fire. (Harter & Jarvie, 2026.)
- Environmental Research Letters article regarding spatial patterns and drivers for wildfire ignitions in California. (Chen & Jin, 2022.)
- Global Environmental Change article summarizing a modeling framework study to compare the importance of climatic and human variables for explaining fire patterns and structure loss. (Syphard, Rustigian-Romsos, 2019.)

These articles provide general information regarding funding for fire suppression and the effects of climate change on wildfire. These articles do not raise any specific environmental issues or deficiency in the RPDEIR analysis. Williams et al., 2019 evaluates climate models to suggest that warming-driven fuel drying is the clearest link between anthropogenic climate change and increased California wildfire activity to date, climate change effects on summer wildfire were less evident in non-forested land, and wind events and delayed onset of winter precipitation did not change much over the past century. Goss et al., 2020 describes that a climate model analysis suggesting that continued climate change will further amplify the number of days with extreme fire weather by the end of the century, though a pathway consistent with the UN Paris commitments would substantially curb that increase. Dong et al., 2022 estimates wildfire probability in southern California using random forest algorithms and downscaled earth system model simulations to project that large fire days will increase from 36 days per year during 1970 -1999 to 58 days per year under moderate GHG emission scenario and 71 days per year under a high GHG emission scenario by 2070–2099. Luković et al., 2021 examines historical data to provide observational evidence for the projected rainfall change over California. Ma et al., 2021 uses a hydrodynamic demographic vegetation model to estimate live fuel moisture content dynamics of chaparral shrubs, finding that climate change could lead to more days per year (5.2% to 14.89% increase) with live fuel moisture content below 79% between the historical (1960–1999) and future (2080-2099) periods. Madakumbura, Moritz, et al., 2025 uses a fire occurrence data set to analyze fire onset and climate controls on its variability during 1992–2020, concluding that northern California ecoregions show stronger trends earlier onset compared to more arid southern California regions, suggesting that anthropogenic warming advanced fire season onset by 6 to 46 days in 11 of 13 ecoregions. Madakumbura, Thackeray et al., 2025 offers a starting point for analysis of the role of climate change on the Los Angeles fires, by identifying factors where human-induced climate change is very likely to play a role in the wildfires, factors where natural climate variability is at play, and others where more inquiry is needed to make definitive statements. Swain, 2021 describes that precipitation observed shifts of delayed and sharper rainy seasons between 1960 and 2019 increase the degree of temporal overlap between extremely dry vegetation conditions and fire-promoting downslope winds in late autumn, which is consistent with climate model projections. MacDonald et al., 2023 examines a confluence of intersecting factors affecting wildfire regimes to conclude that California's wildfire challenges will require multi-faceted and locally targeted responses in terms of fuel management, human-caused ignitions, building

regulations and restrictions, integrative urban and ecosystem planning, and collaboration with Tribes to support the reinvigoration of traditional burning regimes. Ferrara, 2026 and Harter & Jarvie, 2026 describe the Ridge fire that ignited near the 39000 block of Gorman Post Road. The Ridge fire occurred to the west of the Project site but did not burn the Project site. Chen & Jin, 2022 investigated the spatial distribution of contemporary wildfire ignitions in California, using a machine model to examine the complex relationships between ignitions and a suite of environmental co-variates, including human settlement, climate, fuels, and topographical variables, with the goal of providing guidance on prioritizing where and which fire management strategies may be pursued. Please refer to Response B.4-13 regarding Syphard, Rustigian-Romsos, 2019.

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Please refer also to Responses B.4-13 through B.4-19.

Response B.4-22

The comment states that the RPDEIR fails to consider the Project's impacts of increasing ignition risk on sensitive and special-status species and habitats. The comment states that historical Indigenous burning practices and lightning strikes have developed ecosystem-specific fire regimes that were displaced in the last 150 years by genocide and displacement of Native Peoples, criminalization of fire practices, and reckless land uses (*i.e.*, logging and development) that have altered fire regimes and placed more people in harm's way. The comment states that this disruption has led to imbalances in the County's native plant communities and that fire-deficient habitats, when unintentionally ignited, can result in large areas of severe fire that can reduce biodiversity and resilience. The comment states further the other habitats, like chaparral and sage scrub, are adapted to high-severity wildfires at relatively infrequent intervals but increased fire frequency from human ignition sources due to sprawl development is now causing these shrubland habitats to receive too much fire, which is the primary driver of habitat degradation and loss of biodiversity that leads to conversion of these important habitats to non-native grasses and forbs that burn more easily throughout more of the year. The comment states that almost all destructive wildfires are ignited by humans or human infrastructure and that the last decade of unprecedented wildfires in the urban wildland interface is pushing fragmented populations of sensitive species to the brink. Further, the comment claims that heavy rain after wildfires can trigger landslides and debris flow that threaten small populations of sensitive, less mobile species that have been diminished due to habitat loss and fragmentation from sprawl development, dams, disease, non-native predators, and other threats. Lastly, the comment

states that ocean health is also threatened by wildfires in the urban-wildland interface because those fires can release dangerous chemicals and may also play a role in toxic algal blooms that can harm marine wildlife.

Please refer to Response B.4-14 regarding Indigenous burning practices, Responses B.4-18 and B.4-21 regarding fire impacts to native plant communities, and Responses B.4-13, B.4-15, B.4-16 regarding human fire ignition risks. The County acknowledges the commenter's discussion regarding the ecological importance of natural and cultural fire regimes, the role of Indigenous burning practices, and the adverse effects that altered fire frequency and severity can have on native ecosystems and special-status species. The cited information provides general background regarding wildfire ecology and the ecological consequences of human-caused ignitions in California.

The RPDEIR evaluates the Project's potential contribution to wildfire risk, including risks associated with construction and operation of on-site and off-site Project facilities, and identifies mitigation measures and design features to reduce ignition potential and wildfire hazards. The impact analysis is focused on whether implementation of the Project would substantially increase wildfire risk compared to existing conditions and whether such increased risk could result in significant environmental effects. The RPDEIR concludes that, with implementation of applicable fire protection requirements, operational safety standards, fuel management measures, emergency response procedures, and other mitigation measures identified in the document, the Project would not result in a substantial increase in wildfire ignition risk.

The ecological effects of wildfire are context- and species-specific and depend on factors including vegetation community, fire frequency, severity, season, spatial extent, and the life-history characteristics of the species present. The Centennial EIR identified and evaluated the Project site’s grassland, scrub and chaparral, riparian, wetland, and other biological communities, as well as associated special-status plants and wildlife. The comment describes, at a statewide and regional level, how fire suppression can create fire deficits and how increased human-caused ignition frequency can contribute to shrubland type conversion and invasive plant–fire cycles. However, it does not provide site-specific evidence demonstrating that the Project, following implementation of the Project’s ignition-prevention and fuel-management requirements, would alter fire-return intervals or cause fire-related vegetation type conversion or an invasive plant–fire cycle within the Project’s Preserve System or surrounding native habitats. Project requirements also address the potential invasive-plant and fire-cycle mechanism discussed in the comment. MM 7-13 requires a County-approved Landscaping Plan incorporating non-invasive plant species and prohibits identified invasive plants, while the Wildfire Safety Plan prohibits planting or allowing the opportunistic establishment of plants considered undesirable from a fire-safety standpoint within fuel modification zones. These requirements reduce the potential introduction and establishment of invasive or highly flammable vegetation at the interface between development and retained open space. MM 7-4 additionally requires fencing between active construction areas and adjacent open-space preservation areas, and MM 7-17 restricts public access within natural open-space areas to designated trails and limits recreation to passive uses. These measures reduce unauthorized access, ground

disturbance, and pathways for the introduction or spread of invasive plants within preserved habitat. Accordingly, the cited literature concerning possible biological responses to altered fire regimes does not demonstrate that the Project would cause the ecological effects described in the comment.

The comment largely describes the broader regional effects of altered fire regimes, urban-wildland interface development, and historical land management practices. While the County recognizes these concerns, the comment does not provide substantial evidence demonstrating that the Project would materially alter regional fire return intervals, significantly increase ignition frequency, or cause significant impacts to special-status species and habitats beyond those disclosed and analyzed in the RPDEIR. The cited examples of wildfire effects on wildlife illustrate potential consequences of large wildfires generally but do not establish a Project-specific impact attributable to the Project.

The commenter also discusses potential effects of urban-wildland interface wildfires on marine ecosystems, including impacts from ash, contaminants, and post-fire runoff entering coastal waters. While the County acknowledges these concerns, these impacts are not applicable to the Project due to its location and setting. The Project is located within the Antelope Valley region of northern Los Angeles County, an inland desert environment situated substantially removed from the Pacific coastline and associated marine habitats.

The comment cites various newspaper and journal articles as support for commenter's assertions, including:

- Chapter Nineteen of Fire in California's Ecosystems regarding the use of fire by Native Americans in California, digitally published by University of California Press. (K. Anderson, 2018.)
- California Archaeology journal article regarding archaeobotanical evidence for Indigenous burning practices and foodways at an identified archaeological site. (Cuthrell, 2013.)
- Journal of Forestry article regarding the role of Indigenous burning in land management. (Kimmerer & Lake, 2001.)
- Forest Ecology and Management journal article regarding prehistoric fire area and emissions from California's forests, woodlands, shrublands, and grasslands. (Stephens et al., 2007.)
- International Journal of Wildland fire article regarding drivers of California's changing wildfires. (MacDonald et al., 2023.)
- PNAS article regarding impacts to wildlife habitat from fire activity in 2020 and 2021 in California. (Ayars et al., 2023.)
- Global Change Biology article regarding lichen diversity losses from altered fire regimes. (J. E. D. Miller et al., 2018.)

- Diversity and Distributions article regarding implications of large high-severity wildfire patches for avian diversity and community composition. (Steel et al., 2021.)
- The comment cites Baker & Halsey, 2020 but the reference document is not provided.
- Conservation Forum article regarding historic fire regime in southern California shrublands. (Keeley & Fotheringham, 2001.)
- International Journal of Wildland Fires article regarding historical patterns of wildfire ignition sources in California ecosystems. (Keeley & Syphard, 2018.)
- The comment cites Balch et al., 2013 but the reference document is not provided.
- Frontiers in Ecology and the Environment article regarding how people and invasives co-occur to drive fire regimes. (Fusco et al., 2022.)
- Diversity and Distributions journal article regarding drivers of chaparral type conversion to herbaceous vegetation in coastal Southern California. (Syphard, Brennan, et al., 2018.)
- Environmental Research Letter article regarding spatial patterns and drivers for wildfire ignitions in California. (Chen & Jin, 2022.)
- Global Environmental Change article regarding climatic and human variables for explaining fire patterns and structure loss. (Syphard, Rustigian-Romsos, 2019.)
- Current Biology article regarding mountain lions avoiding burned areas and increasing risky behavior in a fragmented urban landscape. (Blakey et al., 2022.)
- Ornithology article regarding wildfire smoke impacts on the body condition and capture rates of birds in California. (Nihei et al., 2024.)
- Environmental Research Letters article regarding the effects of wildfire smoke on the health and behavior of wildlife. (Sanderfoot et al., 2021.)
- Conservation article regarding the impact of wildfires on wildlife and its conservation and the role of the veterinarian. (Garcês & Pires, 2023.)
- Los Angeles Times article regarding rescue operations for rare species before flooding due to winter storms after the Bobcat Fire. (Sahagun, 2020.)
- Los Angeles Times article regarding rescue of northern tidewater gobies from the Palisades burn area. (Seidman, 2025a.)
- Los Angeles Times article regarding rescue of trout from the Palisades burn area. (Seidman, 2025b.)
- Los Angeles Times article regarding return of northern tidewater gobies to the Topanga lagoon. (Seidman, 2025c.)
- Los Angeles Times article regarding scientists studying impact of the Los Angeles fires on the ocean. (Purtill & Xia, 2025.)
- Los Angeles Times article regarding end of algae bloom. (Harter, 2025.)

- Los Angeles Times article regarding lifeguards taking mental health leave as beach algae bloom takes toll. (Lin, 2025.)

These articles provide general information regarding Indigenous burning practices and impacts of wildfire to biological resources. These articles do not raise any specific environmental issues or deficiency in the RPDEIR analysis. Regarding Indigenous burning practices, K. Anderson, 2018 describes Native American use of fire and how this cultural activity has influenced ecosystems and how it can continue in light of conflicting land management objectives. Cuthrell, 2013 evaluates evidence from an archaeological site in the Quiroste Valley to support the hypothesis of frequent anthropogenic landscape burning during the late Holocene period. Kimmerer & Lake, 2001 highlights the findings of the literature on aboriginal fire from the human- and land-centered disciplines and suggests that the traditional knowledge of indigenous peoples be incorporated into plans for reintroducing fire to the nation's forests. Stephens et al., 2007 summarizes the literature on fire history and past Native American burning practices to estimate past fire occurrence by vegetation type. MacDonald et al., 2023 examines a confluence of intersecting factors affecting wildfire regimes to conclude that California's wildfire challenges will require multi-faceted and locally targeted responses in terms of fuel management, human-caused ignitions, building regulations and restrictions, integrative urban and ecosystem planning, and collaboration with Tribes to support the reinvigoration of traditional burning regimes.

Regarding biological impacts of wildfires, Ayars et al., 2023 used data regarding area burned in California 2020 and 2021 wildfires and average habitat suitability and identified patterns by fire severity, conservation status, and taxonomic group, finding that 100 vertebrate species experienced fire across more than 10% of their range; more species of the greatest conservation need than expected experienced no burning in their ranges and far fewer special-status species had any amount of their range burn; and there was more unburned area and less burned area for special-status species compared to other species. J. E. D. Miller et al., 2018 sampled epiphytic lichen communities in 104 study plots across California's Sierra Nevada region in areas that burned in five wildfires, ranging from 4 to 16 years prior to sampling, finding that low-severity fires had little to no effect on lichen communities but areas that burned at moderate and high severities have significantly and progressively lower lichen richness and abundance.

In addition, Steel et al., 2021 evaluated how large high-severity patches with interior areas far from less disturbed habitats created by wildfires impact bird communities, concluding that such changes are likely to decrease avian diversity locally and shift community composition away from forest-associated species. Keeley & Fotheringham, 2001 found no evidence that fire management policies limiting prescribed burning have created the contemporary fire regime dominated by massive Santa Ana wind-driven fires. Keeley & Syphard, 2018 documented fire-ignition patterns in California over approximately 100 years, finding fire frequency increased throughout the state until a peak in 1980, followed by a marked drop to 2016, natural lightning-ignited fires were consistently fewer from north to south and from high to low elevation, human-caused fires were positively correlated with population density for the first 2/3 of the record but the relationship reversed, and powerline ignitions is one notable exception to the marked decline in ignition sources. Fusco

et al., 2022 outlined a new human-grass-fire cycle framework, suggesting research directions to address the role people play in perpetuating invasive grass fire, and a framework for management strategies that encourage fire and invasive species management communities.

Further, Syphard, Brennan, et al., 2018 do not address fuel modification zones at all, concluding that short-interval fire is a critical mechanism contributing to shrubland extirpation and landscape disturbances, such as trail construction, provide the means for herbaceous species to colonize open areas. Chen & Jin, 2022 investigated the spatial distribution of contemporary wildfire ignitions in California, using a machine model to examine the complex relationships between ignitions and a suite of environmental co-variates, including human settlement, climate, fuels, and topographical variables, with the goal of providing guidance on prioritizing where and which fire management strategies may be pursued. Please refer to Response B.4-13 regarding Syphard, Rustigian-Romsos, 2019.

Blakey et al., 2022 studied mountain lion behavior using GPS location and accelerometer data from 17 individuals tracked before and after the 2018 Woolsey Fire and determined that lions avoided burned areas, increased road and freeway crossings (mean crossings increased from 3 to 5 per month), had greater activity during the daytime (means increased from 10% to 16% of time active during daytime), and increased their amount of space used, distance traveled, and intrasexual overlap. Nihei et al., 2024 used two decades of banding data from the San Francisco Bay Bird Observatory to investigate how fine particulate matter influenced capture rates and body condition of 21 passerine or near-passerine bird species, with findings indicative that wildfire smoke likely influences the health and behavior of birds, ultimately contributing to a shift in activity and body condition, with differential short-term versus long-term impacts.

Sanderfoot et al., 2021 synthesized findings from 41 studies and incorporated knowledge gained from fields outside of wildlife science, specifically veterinary medicine and air pollution toxicology, demonstrating that smoke inhalation can lead to carbon monoxide poisoning, respiratory distress, neurological impairment, respiratory and cardiovascular disease, oxidative stress, and immunosuppression in wildlife. Garcês & Pires, 2023 describes different species' behavior during a wildfire, the effects of the ecosystem, the socioeconomic impact on the regions, and lists the major injuries that a veterinarian should expect to be observed and how to proceed. Sahagun, 2020 describes efforts to rescue special-status species prior to anticipated winter storms after the Bobcat fire in the San Gabriel mountains in 2020. Seidman, 2025a, 2025b describes rescue of northern tidewater gobies and steelhead trout from the Santa Monica Mountains in a watershed burned by the Palisades fire and Seidman, 2025c describes the return of the tidewater gobies to their lagoon five months later.

Purtill & Xia, 2025 describe the collection of samples to study impacts of the Los Angeles fire on the ocean and marine life. Harter, 2025 describes the ending of a large-scale algae bloom, which California can experience when warm water combines with excess nutrients such as nitrogen and phosphorus. The article does not address wildfires contributing to algae bloom. Lin, 2025 describes the mental toll of the most recent algae bloom to lifeguards and states: "some experts wonder if runoff from January's firestorms has made the bloom worse."

CEQA requires that the Final Recirculated EIR address comments submitted during the public comment period that raise significant environmental issues on the adequacy of the RPDEIR. (PRC Section 21091(d)(2)(B); CEQA Guidelines Section 15088(c).) "The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information or does not explain the relevance of evidence submitted with the comment." (CEQA Guidelines Section 15088(c).) Please refer to the entirety of this Response B.4-22 with respect to those statements the commenter claims are supported by these articles.

Please refer also to Responses B.4-6, B.4-7, B.4-13, B.4-15 through B.4-19, and B.4-21.

Response B.4-23

The comment states that the RPDEIR fails to adequately consider wildfire impacts to human health and safety. The comment states that new projects in fire-prone areas must consider the additional burden on local agencies to protect communities from wildfire and claims that fire agencies can be overwhelmed and the public has "unrealistic expectations" of agency abilities to protect communities from fire. The comment claims the County has not made necessary improvements to respond to wildfire disasters and that lack of funding, insufficient staffing, unclear and outdated evacuation protocols, limited firefighting resources, insufficient communication and alerts, and more resulted in 31 deaths and widespread destruction during the Los Angeles wildfires.

The County acknowledges the commenter's concerns regarding regional wildfire-response challenges and the importance of maintaining adequate emergency preparedness and firefighting resources. The examples cited by the commenter describe large-scale wildfire events that occurred under extreme weather, fuel, and fire-behavior conditions, and they highlight operational challenges encountered by responding agencies during those incidents.

However, the circumstances described in the comment are not comparable to conditions at the Project site and do not demonstrate a Project-specific impact. The Woolsey Fire and the other cited incidents occurred in areas with substantially different environmental and wildfire-hazard conditions than those present within the Project area. (See RPDEIR Appendix G, *Wildfire Safety Plan*, Section 4.9 (describing communities with highly destructive wildfires as facing extreme wind events, connective fuels laced between homes, and presence of hazardous plant species (palms, cypress, pines) and heavy fuels, steep terrain and narrow roads.) In addition, the communities affected by those events were developed over several decades under earlier planning and building standards, land-use patterns, and fire-protection requirements that differ from those applicable to the Project. The Project is a newly planned development that would be designed, constructed, and operated in accordance with the current California Wildland-Urban Interface Code (CWUIC) and applicable County development standards. Accordingly, the Project would incorporate contemporary fire-resilient design features, including emergency-access standards, fire-flow and water-supply requirements, fuel-modification and defensible-space requirements,

ignition-resistant construction materials, and other fire-protection measures that may not have been required when older communities were originally developed.

As described in the RPDEIR, the Project would provide three, and potentially up to four, fully equipped and staffed fire stations to support adequate fire-service response times. Centennial would also have sufficient water supply for fire-suppression needs and would include code-compliant fire-hydrant systems with adequate fire flows. Moreover, the RPDEIR describes that the Project's code-compliant internal circulation system and parking restrictions would ensure that firefighting apparatus have appropriate access throughout the Centennial site to provide fire-suppression services. The Project would also provide sufficient access points to support safe and timely ingress to and egress from the Project site for first responders and the public. Please refer also to Responses B.4-13 and B.4-15 through B.4-21.

The comment's characterization of the causes of recent wildfire disasters oversimplifies a complex issue that remains the subject of ongoing analysis and professional discussion. Large wildfire losses result from numerous interacting factors, including extreme weather, drought, fuel conditions, topography, ignition location, fire behavior, vegetation type, development patterns, evacuation timing, communications systems, infrastructure performance, and the availability and deployment of firefighting resources. Accordingly, attributing loss of life or structures in particular wildfire events solely or primarily to funding levels, staffing, evacuation protocols, or emergency-response capabilities does not fully reflect the complexity of those incidents.

The comment cites various reports and articles as support for commenter's assertions, including:

- County of Los Angeles report regarding after action review of the Woolsey fire. (Citygate Associates, 2019.)
- County of Sonoma after action report and improvement plan. (County of Sonoma, 2018.)
- Los Angeles Times article regarding Los Angeles County after action report for the Los Angeles fires. (Jarvie, 2025.)
- County of Los Angeles report after action review of alert notification systems and evacuation policies for the Los Angeles fires. (McChrystal Group, 2025.)

These articles provide general information regarding after-action reviews of emergency responses to major wildfires. These articles do not raise any specific environmental issues or deficiency in the RPDEIR analysis. Citygate Associates, 2019 and County of Sonoma, 2018 evaluate the successes and challenges of the emergency response for the Woolsey and Tubbs fires, respectively. Jarvie, 2025 reports on the after-action report of the Los Angeles fires and the seeming lack of progress, particularly the inability to clear policies and protocol, to improve emergency preparedness and to learn lessons from past major wildfires. McChrystal Group, 2025 examined policies and procedures and analyzed over 150,000 alert

and data records, minute-by-minute GPS tracking of responding units, community feedback from six public listening sessions, and interviews with emergency responders and senior officials and identified a series of weaknesses that impacted the public alert, warning, and evacuation operation system's effectiveness.

CEQA requires that the Final Recirculated EIR address comments submitted during the public comment period that raise significant environmental issues on the adequacy of the RPDEIR. (PRC Section 21091(d)(2)(B); CEQA Guidelines Section 15088(c).) "The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information or does not explain the relevance of evidence submitted with the comment." (CEQA Guidelines Section 15088(c).) Please refer to the entirety of this Response B.4-23 with respect to those statements the commenter claims are supported by these articles.

Response B.4-24

The comment states wildfires impact human health and disproportionately affect low-income and minority communities. The comment states that at-risk and vulnerable populations have limited resources for disaster planning and preparedness, evacuation, and to rebuild, and that lack of multi-lingual evacuation warnings leave non-English speakers in danger. The comment sets forth commenter's summary of various source materials regarding adverse public health effects related to wildland fires and smoke exposure, including respiratory and cardiovascular symptoms, dementia, pre-natal health problems, excess deaths, toxic contaminant exposure, increase risk to farm workers and fire fighters, lung health, and depression. The comment claims proper analyses and mitigation of the Project's impacts on wildfire ignition, wildfire spread, and the negative health impacts associated with wildfire are needed in a subsequent EIR.

The RPDEIR describes that smoke released during a wildfire event can have a detrimental effect on air quality and lead to health risks from smoke inhalation. (RPDEIR, p. 2.3-118.) Risks associated with pollutants at the Project site would be similar or less than that experienced across southern California because the Project would include several measures to reduce overall fire risk in the area and would not exacerbate wildfire risks and exposure to smoke inhalation. (RPDEIR, pp. 2.3-118 through 2.3-119.) The RPDEIR concludes that the Project would not worsen the detrimental effect on air quality and health risks from smoke inhalation to users of the site or within the surrounding community. (RPDEIR, p. 2.3-119.) The RPDEIR describes that in areas where the public might be experiencing wildfire smoke, the U.S. Environmental Protection Agency recommends that public health and air quality agencies provide advice on strategies to limit exposure, including limiting physical activity, reducing indoor air pollution sources, effectively using air conditioners and air filters or cleaners, creating cleaner air shelters, and using respiratory protection appropriately. (*Id.*) The most common advisory during a smoke episode is to stay indoors, where people can better control their environment. (*Id.*) Whether at home or in a public space, indoor environments that have filtered air and climate control can provide relief from smoke and heat (EPA 2019). (*Id.*) The Project would be expected to follow public health and air quality

agencies strategies to limit exposure to pollutant concentrations during a wildfire. (*Id.*; see also RPDEIR, p. 3-9.) Under RPDEIR Threshold 2.3-3, the RPDEIR concludes that with mitigation the Project will not exacerbate wildfire risks and thereby expose Centennial occupants to pollutant concentrations from a wildfire and that such impact is less than significant.

The basis for this comment assumes that the Project is likely to result in or exacerbate the risk of large and severe wildfires, particularly with significant structure loss. The comment does not justify this basis. The comment references the post-fire impacts of both the 2018 Camp Fire and the 2025 LA wildfires, citing the toxic pollution caused by these wildfires. The Project does not propose development with the characteristics typically associated with large-scale structure loss during historical wildfires. Rather, the Project has been designed as a wildfire-resilient, master-planned community that incorporates multiple layers of wildfire protection and exceeds standard wildfire risk-reduction requirements. As a result, the Project would not be expected to increase the frequency of community exposure to wildfire smoke, toxic emissions, or associated adverse public health effects.

The RPDEIR concluded that the Project's potential to cause off-site ignitions is Moderate and would be reduced through the implementation of extensive wildfire prevention, fuel management, infrastructure design, and emergency response measures. Accordingly, the likelihood that the Project would substantially increase off-site ignitions and thereby result in significant smoke-related or other health impacts to adjacent communities is low. The comment has not provided substantial evidence demonstrating that the Project would result in a significant increase in community exposure to wildfire-related toxicity, smoke, or adverse health effects. Please refer also to Responses B.4-13, B.4-15 through B.4-19, B.4-21, and B.4-22.

The comment cites various reports and articles as support for commenter's assertions, including:

- PLOS ONE article regarding unequal vulnerability of communities of color to wildfire. (Davies et al., 2018.)
- Center for American Progress article regarding vulnerable communities response and rebuild after the Camp fire. (Richards, 2019.)
- Research Gate article regarding poverty and disasters in the United States. (Fothergill & Peek, 2004.)
- NPR article regarding low-income communities struggle to recover after a wildfire. (Harnett, 2018.)
- Los Angeles Magazine article regarding how the ultra-wealthy are making themselves immune to natural disasters. (Morris, 2018.)
- UCLA Ralph J. Bunche Center for African American Studies report on impacts to Altadena's black community from the Eaton fire. (Ong, Pech, Frasure, et al., 2025.)

- Los Angeles Times article regarding living in homes that survived the Eaton fire. (Vives & Castillo, 2025.)
- Los Angeles Times article regarding County fire trucks staying elsewhere as west Altadena burned. (Ellis, 2025.)
- Los Angeles Times article regarding elderly, disabled being left stranded during the Los Angeles fires. (Jarvie et al., 2025.)
- Los Angeles Times article regarding human remains found in Altadena six months after the Los Angeles fires. (Castleman, 2025.)
- The comment cites Toohey & Jarvie, 2025 but this reference document is not provided.
- Perspective article regarding the changing risk and burden of wildfire in the United States. (Burke et al., 2021.)
- National Institute of Health article regarding the relationship of respiratory and cardiovascular hospital admissions to the southern California wildfires of 2003. (Delfino et al., 2009.)
- American Journal of Respiratory and Critical Care Medicine article regarding health effects of the 2003 southern California wildfires on children. (Kunzli et al., 2006.)
- National Institute of Health article regarding physical health impacts from non-occupational exposure to wildfire smoke. (Liu et al., 2015.)
- Environmental Health article regarding cardio-respiratory outcomes associated with exposure to wildfire smoke being modified by measures of community health. (Rappold et al., 2012.)
- Environmental Health Perspectives article regarding critical review of health impacts of wildfire smoke exposure. (Reid et al., 2012.)
- Journal of the Air & Waste Management Association article regarding the effects of San Diego wildfire on ambient air quality. (Viswanathan et al., 2006.)
- JAMA Internal Medicine article regarding comparison of particulate air pollution from different emissions sources and incident dementia in the United States. (B. Zhang et al., 2023.)
- American Journal of Epidemiology article regarding associations of air pollution and genetic risk with incident dementia. (Z. Zhang et al., 2022.)
- Environmental Health Perspectives article regarding birth outcomes, health, and healthcare needs to childbearing women following wildfire disasters. (Evans et al., 2022.)
- Environmental Science & Technology article regarding adverse birth outcomes associated with heat stress and wildfire smoke exposure during preconception and pregnancy. (Khalili et al., 2025.)

- Science Advances article regarding mortality attributable to PM2.5 from wildland fires in California from 2008 to 2018. (Connolly et al., 2024.)
- Non-peer reviewed preprint of an article submitted to EarthARXiv regarding wildfire smoke exposure and mortality burden in the United States under future climate change. (Qiu et al., 2025.)
- California Air Resources Board report regarding Camp fire air quality data analysis. (CARB, 2021.)
- KQED article regarding Caltech scientists studying toxic aftermath of the Eaton fire. (Champlin, 2025.)
- Los Angeles Times article regarding soil testing for toxic substances after the Los Angeles fires. (H. Smith & Briscoe, 2025.)
- Los Angeles Times article regarding soil contamination at Pasadena Unified schools. (Haggerty & Briscoe, 2025.)
- Pacific Standard and Investigate West magazine articles regarding farmworkers continuing to work despite wildfire smoke. (Herrera, 2018 & Kardas-Nelson et al., 2020.)
- Vice magazine article regarding disproportionate health impacts of wildfire on people of color. (Parshley, 2018.)
- New York Times article regarding unmasked U.S. Forest Service firefighters getting sick and dying. (Dreier, 2025.)
- The Lancet article regarding potential toxicant exposure and the health risk of smoke for wildland firefighters. (Hwang et al., 2023.)
- San Francisco Chronicle article regarding lack of protection for California's wildland firefighters. (Johnson & Lam, 2023.)
- Sacramento Bee article regarding days away from home and mental health challenges facing firefighters. (Ashton et al., 2018.)
- New York Times article regarding the lengthening fire season and impacts to fire fighters. (Bransford et al., 2018.)
- New York Times article regarding the increasing strain on California's firefighters. (Del Real & Kang, 2018.)
- NPR article regarding California firefighters battling exhaustion. (Greene, 2018.)
- San Francisco Chronicle article regarding fire fighter fatigue. (Gutierrez, 2018.)
- The comment cites Simon, 2018 but this reference document is not provided.
- Los Angeles Times article regarding fire fighters in the Los Angeles fires having elevated blood levels of mercury and lead. (Hernandez, 2025.)
- Los Angeles Times article regarding fire cleanup workers not wearing personal protective equipment. (Haggerty, 2025.)

- JAMA article regarding health and social support in the aftermath of the Maui wildfires. (Juarez et al., 2025.)
- American Medical Association Letters article regarding increases in suicides and overdoses during the Maui wildfires. (Purtle et al., 2025.)
- American Medical Association Letters article regarding excess deaths attributable to the Los Angeles wildfires from January 5 to February 1, 2025. (Paglino et al., 2025.)

These articles provide general information regarding health impacts relating to wildfires. These articles do not raise any specific environmental issues or deficiency in the RPDEIR analysis. Specifically, Davies et al., 2018 developed a social-ecological approach for characterizing fire vulnerability and applied it to more than 70,000 census tracts across the United States, finding that over 29 million Americans live with significant potential for extreme wildfires, a majority of whom are white and socioeconomically secure, but 12 million of which are socially vulnerable and such vulnerability is spread unequally across race and ethnicity. Richards, 2019 reports that impacts of the Camp fire were not equally borne across the community because older homes were more likely to burn, people unable to escape were disproportionately elderly or disabled, and obstacles facing disadvantaged communities are compounded during and after a disaster and recommends policies to better protect people during disasters and help communities recover in an equitable manner.

Further, Fothergill & Peek, 2004 synthesized literature on poverty and disasters in the United States to illustrate how people of different socioeconomic statuses perceive, prepare for, and respond to natural hazard risks, how low-income populations may be differently impacted, and how disaster effects vary by social class, concluding that the poor are more vulnerable to natural disasters due to such factors as place and type of residence, building construction, and social exclusion. Harnett, 2018 reports on challenges facing poor communities after a wildfire. Morris, 2018 reports on the use of private fire fighters during the Woolsey fire and access to expensive havens by the ultra-wealthy after a natural disaster.

In addition, Ong, Pech, Frasure, et al., 2025 reports that black households in Altadena were disproportionately more likely to experience damage or destruction due to the Eaton fire. Vives & Castillo, 2025 reports on the struggles facing families who returned to an apartment building in Altadena in the aftermath of the Eaton fire. Ellis, 2025 reports that County fire trucks did not shift into west Altadena, instead remaining to protect east Altadena and the Pacific Palisades. Jarvie et al., 2025 reports on the Disability Community Resource Center's efforts to assist disabled Angelenos with evacuation in the Palisades fire and evacuation challenges for the elderly and disabled in Altadena. Burke et al., 2021 developed a statistical model that relates satellite-based fire and smoke data to information from pollution monitoring stations to estimate that wildfires have accounted for up to 25% of $PM_{2.5}$ in recent years across the United States and up to half in some western regions, with spatial patterns in ambient smoke that do not follow traditional socioeconomic pollution exposure gradients. The study concludes that fuel management interventions could have large health benefits and that future health impacts from climate change-induced wildfire smoke could approach projected overall increases in temperature-related mortality from climate change, but both estimates remain uncertain.

Delfino et al., 2009 reports that wildfire related $PM_{2.5}$ led to increased respiratory hospital admissions, especially asthma, suggesting that better preventative measures are required to reduce morbidity among vulnerable populations. Kunzli et al., 2006 reports that wildfire smoke was associated with increased eye and respiratory symptoms, medication use, and physician use. Liu et al., 2015 identified 61 epidemiological studies linking wildfire and human health (mostly in the United States and Australia) and concluded that exposure measurement is a key challenge in the literature, a limitation is the difficulty of estimating pollution specific to wildfires, new methods are needed to separate air pollution levels of wildfire from those of ambient sources (such as transportation), the majority of studies found that wildfire smoke was associated with increased risk of respiratory and cardiovascular diseases, children, the elderly, and those with underlying chronic diseases appear to be susceptible, and more studies are needed. Rappold et al., 2012 evaluated general and specific measures of community health as modifiers of risk for asthma and congestive heart failure following an episode of acute exposure to wildfire smoke, concluding that socioeconomic factors should be considered as modifying risk factors in air pollution studies and be evaluated in the assessment of air pollution impacts. Reid et al., 2012 assessed scientific literature for studies of wildfire smoke exposure on mortality and on respiratory, cardiovascular, mental, and perinatal health, concluding that consistent evidence indicated that wildfire smoke exposure is associated with respiratory morbidity with growing evidence supporting an association with all-cause mortality and more research is needed to clarify which causes of mortality may be associated with wildfire smoke, whether cardiovascular outcomes are associated with wildfire smoke, and if certain populations are more susceptible.

Viswanathan et al., 2006 analyzed data from San Diego County Air Pollution Control District and California Air Resources board, finding that increased particulate matter concentration resulted in a significant increase in hospital emergency room visits for asthma, respiratory problems, eye irritation, and smoke inhalation. B. Zhang et al., 2023 examined associations of long-term exposure of total and source-specific $PM_{2.5}$ with incident dementia in older adults, concluding that higher residential $PM_{2.5}$ levels, especially from agriculture and wildfires, were associated with higher rates of incident dementia. Z. Zhang et al., 2022 investigated the joint effects of air pollution exposure and genetic risk on incident dementia in a prospective cohort study, using land use regression models to estimate exposure and a polygenic risk score to quantitatively measure genetic dementia risk, finding positive associations between exposure to air pollution (particulate matter and nitrogen dioxide especially) and incident all-cause dementia and Alzheimer disease but not vascular dementia.

Evans et al., 2022 reviewed literature to conclude that wildfire exposure may be associated with changes to birth outcomes and increased morbidity for childbearing women and their babies. Khalili et al., 2025 investigated associations between preconception and prenatal heat stress and wildfire smoke exposures on adverse birth outcomes and whether neighborhood climate vulnerability is an effect modifier in the Maternal and Developmental Risks from Environmental and Social stressors cohort. Connolly et al., 2024 quantified the mortality burden for $PM_{2.5}$ exposure from California fires from 2008 to 2018 using

Community Multiscale Air Quality modeling system wildland fire $PM_{2.5}$ estimates, resulting in an estimated total of 52,480 to 55,710 premature deaths attributable to wildland fire $PM_{2.5}$ over the 11-year period with two exposure scenarios. Qiu et al., 2025 used statistical and machine learning models to quantify the mortality burden in the United States due to $PM_{2.5}$ under future climate change, projecting 27,800 excess deaths per year by 2050 under a high warming scenario with cumulative excess deaths between 2025 and 2055 at 700,000.

CARB, 2021 evaluated data from four wildfires to better understand the air quality differences that might occur between wildfires that burn primarily vegetation and those that burn more structures and examined potential additional health impacts that could arise from structure-burning wildfires. Champlin, 2025 reports on Caltech scientists testing ash at homes that survived the Eaton fires for lead. H. Smith & Briscoe, 2025 reports on the government refusing to pay for soil testing and the newspapers' own soil testing initiative that found soil contamination at some properties, including some with soil remediation performed by the federal government. Haggerty & Briscoe, 2025 reports eleven of the 23 Pasadena Unified School District schools had contaminated soil after the Eaton fire. Herrera, 2018 & Kardas-Nelson et al., 2020 describes that farmworkers continue to work during wildfire smoke. Parshley, 2018 discusses the disparate impact of wildfire smoke on people of color. Dreier, 2025 and Johnson & Lam, 2023 report on wildland firefighters getting sick and dying while mask mandates that would protect workers are resisted.

Hwang et al., 2023 reviews economic costs, health impact, respiratory protection, multipollutant mixtures, and proactive management of wildfires with respect to health impacts in wildland firefighters. Ashton et al., 2018, Bransford et al., 2018, Del Real & Kang, 2018, Greene, 2018, Gutierrez, 2018 report on time away from home and mental health challenges facing firefighters and their families. Hernandez, 2025 reports on a health study of fire fighters in the Los Angeles fires where elevated toxins in blood were found. Haggerty, 2025 reports on efforts to provide personal protective equipment for day laborers cleaning up fire debris. Juarez et al., 2025 assessed midterm health outcomes of wildfire exposure, including respiratory and mental health, and evaluates interaction of social support with these health burdens. Purtle et al., 2025 used statistical and census data to find increases in suicide and overdose deaths in Maui and across the Hawaiian Islands broadly following the 2023 wildfires. Paglino et al., 2025 modeled data to calculate excess deaths attributable to the Los Angeles fires.

CEQA requires that the Final Recirculated EIR address comments submitted during the public comment period that raise significant environmental issues on the adequacy of the RPDEIR. (PRC Section 21091(d)(2)(B); CEQA Guidelines Section 15088(c).) "The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information or does not explain the relevance of evidence submitted with the comment." (CEQA Guidelines Section 15088(c).) Please refer to the entirety of this Response B.4-24 with respect to those statements the commenter claims are supported by these articles.

Response B.4-25

This comment states that the RPDEIR should disclose that new residents and owners will likely not be able to insure their homes against wildfire risk. The comment describes the insurance crisis facing California, with fewer options and increased premiums to insure homes in the wildland-urban interface. The comment states that a subsequent EIR should analyze whether the proposed residences will be insurable through private insurers or require access to the California FAIR Plan. The comment states that the RPDEIR should include a mitigation measure requiring the Project proponent to financially cover the wildfire insurance for homes being sold or otherwise disclose insurance availability and risks.

The County acknowledges the commenter's concerns regarding the availability and affordability of homeowners insurance in California, including issues related to wildfire risk, insurance premiums, coverage limitations, and the California FAIR Plan. The County recognizes that insurance markets in California have experienced significant changes in recent years and that these issues are of interest to homeowners, policymakers, insurers, and regulators.

However, the availability, affordability, terms, and administration of private insurance policies and state-sponsored insurance programs are economic and regulatory matters that are outside the scope of CEQA review. Under CEQA, economic or social effects of a project are not to be treated as significant effects on the environment (CEQA Guidelines Section 15131(a).) CEQA requires only analysis of physical environmental impacts. (Pub. Res. Code, Section 21100(d) ["…[A]ny significant effects on the environment shall be limited to substantial, or potentially substantial, adverse changes in physical conditions…"].) Significant impacts analyzed under CEQA must be related to a physical change in the environment. (CEQA Guidelines Sections 15382, 15358(b); *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, 576-582 [CEQA does not require an analysis of social impacts]; *Maintain Our Desert Env't v. Town of Apple Valley* (2004) 124 Cal.App.4th 430, 445 ["…[S]ocial, economic and business competition concerns are not relevant to CEQA analysis unless it is demonstrated that those concerns will have a significant effect on the physical environment."] The commenter has not identified a direct physical environmental impact associated with whether future homeowners are able to obtain insurance through private insurers, the California FAIR Plan, or other insurance mechanisms.

Please refer also to Responses B.4-13 and B.4-15 through B.4-21.

The comment cites various reports and articles as support for commenter's assertions, including:

- Moody's article regarding the insurance gap and hidden risks for California homeowners in wildfire-prone areas. (Saleh, 2025.)
- NPR podcast transcript regarding Los Angeles homeowners suing insurance companies for not covering damages from fires. (Overland, 2025.)

- San Francisco Chronicle article regarding underinsurance in California. (Neilson, 2025.)
- Politico article regarding California creating the first public wildfire model for insurance. (Rahim, 2025.)

These articles provide general information regarding the insurance crisis. These articles do not raise any specific environmental issues or deficiency in the RPDEIR analysis. Saleh, 2025 compared home insurance non-renewals in 2023 to increase in FAIR Plan policies, identifying an insurance gap, and discusses regulatory changes to allow for the use of catastrophe models in wildfire ratemaking. Overland, 2025 reports on insurance companies refusing coverage for smoke damage after the Los Angeles fires. Neilson, 2025 reports on faulty algorithms and flawed processes leading the state's biggest insurance companies to routinely underestimate rebuilding costs. Rahim, 2025 reports on legislation to require the state to create a publicly available wildfire model to allow for transparency with respect to insurance rates. As described in Response B.4-13, CEQA requires that the Final Recirculated EIR address comments submitted during the public comment period that raise significant environmental issues on the adequacy of the RPDEIR. (PRC Section 21091(d)(2)(B); CEQA Guidelines Section 15088(c).) "The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information or does not explain the relevance of evidence submitted with the comment." (CEQA Guidelines Section 15088(c).) Please refer to the entirety of this Response B.4-25 with respect to those statements the commenter claims are supported by these articles.

Response B.4-26

The comment states that the RPDEIR fails to consider the impacts of wildfire on firefighters and costs. The comment states that development within high fire hazard areas will increase ignitions and associated fire suppression, damage, and recovery costs, and the RPDEIR lacks information regarding how more development will necessitate significant fire-fighting costs. The comment states that economic costs of wildfire are skyrocketing, climate change is increasing extreme weather and fire conditions, and the fire season is lengthening, which takes a toll on the physical, mental, and emotional health of firefighters.

As described in the RPDEIR, the Project would provide three, and up to four, fully equipped and staffed fire stations to ensure adequate fire-service response times. The Project would have a sufficient water supply to serve fire-suppression needs and would be constructed to provide code-compliant fire-hydrant systems with adequate fire flows. The Project's code-compliant internal circulation system and parking restrictions would ensure that firefighting apparatus would have appropriate access to, in, and around the Project site as necessary to provide fire-suppression services, and that the Project would provide sufficient access points to ensure safe and timely ingress to and egress from the Project site to serve the needs of first responders.

In addition, the comment addresses economic impacts that, while important policy considerations, are outside the scope of CEQA. (CEQA Guidelines Section 15131(a).) CEQA requires only analysis of physical environmental impacts. (Pub. Res. Code Section 21100(d) ["…[A]ny significant effects on the environment shall be limited to substantial, or potentially substantial, adverse changes in physical conditions…"].) Significant impacts analyzed under CEQA must be related to a physical change in the environment. (CEQA Guidelines Sections 15382, 15358(b); *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, 576-582 [CEQA does not require an analysis of social impacts]; *Maintain Our Desert Env't v. Town of Apple Valley* (2004) 124 Cal.App.4th 430, 445 ["…[S]ocial, economic and business competition concerns are not relevant to CEQA analysis unless it is demonstrated that those concerns will have a significant effect on the physical environment."].

This comment does not address the RPDEIR's analysis of the Project's wildfire risks but rather references the historical wildfires that affected communities dissimilar from the master planned Project, which will be constructed in compliance with Chapter 5 of the California Wildland-Urban Interface Code (formerly Chapter 7A of the California Building Code), will be surrounded by fuel modification zones, and will be specifically designed to ensure adequate fire response times by fully equipped fire stations in the event of a fire. The Project will be developed as a well-planned and mitigated master-planned community. No master-planned community built after the adoption of California Building Code Chapter 7A has experienced significant structural losses due to wildfire because modern code-compliant master-planned communities provide a baseline level of high wildfire safety.

Please refer to Responses B.4-13, B.4-15 through B.4-22.

The comment cites various reports and articles as support for commenter's assertions, including:

- The comment cites Balch et al., 2017 but the reference document is not provided.
- International Journal of Wildland Fires article regarding historical patterns of wildfire ignition sources in California ecosystems. (Keeley & Syphard, 2018.)
- The comment cites CalFire 2022, LAO 2023, D. Wang et al., 2021, and Simon, 2018 but the reference documents are not provided.
- AccuWeather news article estimating damages and economic loss from Los Angeles wildfires. (Danielle, 2025.)
- San Francisco Chronicle article regarding fire fighter fatigue. (Gutierrez, 2018.)
- Sacramento Bee article regarding days away from home and mental health challenges facing firefighters. (Ashton et al., 2018.)
- New York Times article regarding the lengthening fire season and impacts to fire fighters. (Bransford et al., 2018.)
- New York Times article regarding the increasing strain on California's firefighters. (Del Real & Kang, 2018.)

- NPR article regarding California firefighters battling exhaustion. (Greene, 2018.)
- The Lancet article regarding potential toxicant exposure and the health risk of smoke for wildland firefighters. (Hwang et al., 2023.)
- San Francisco Chronicle article regarding lack of protection for California's wildland firefighters. (Johnson & Lam, 2023.)
- Los Angeles Times article regarding fire fighters in the Los Angeles fires having elevated blood levels of mercury and lead. (Hernandez, 2025.)
- Cal Matters article regarding trauma of fighting California's wildfires. (Cart, 2022.)

These articles provide general information regarding wildfire ignition and impacts to fire fighters. These articles do not raise any specific environmental issues or deficiency in the RPDEIR analysis. Keeley & Syphard, 2018 documented fire-ignition patterns in California over approximately 100 years, finding fire frequency increased throughout the state until a peak in 1980, followed by a marked drop to 2016, natural lightning-ignited fires were consistently fewer from north to south and from high to low elevation, human-caused fires were positively correlated with population density for the first 2/3 of the record but the relationship reversed, and powerline ignitions is one notable exception to the marked decline in ignition sources. Danielle, 2025 reports on a preliminary estimate of total damage and economic loss associated with the Los Angeles fires. Gutierrez, 2018, Ashton et al., 2018, Bransford et al., 2018, Del Real & Kang, 2018, and Greene, 2018 report on mental health challenges facing firefighters and their families. Hwang et al., 2023 reviewed economic costs, health impact, respiratory protection, multipollutant mixtures, and proactive management of wildfires with respect to health impacts in wildland firefighters. Johnson & Lam, 2023 reports on wildland firefighters getting sick and dying while mask mandates that would protect workers are resisted. Hernandez, 2025 reports on a health study of fire fighters in the Los Angeles fires where elevated toxins in blood were found. Cart, 2022 reports on mental health challenges facing California firefighters, including post-traumatic stress, suicide and fatigue.

CEQA requires that the Final Recirculated EIR address comments submitted during the public comment period that raise significant environmental issues on the adequacy of the RPDEIR. (PRC Section 21091(d)(2)(B); CEQA Guidelines Section 15088(c).) "The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information or does not explain the relevance of evidence submitted with the comment." (CEQA Guidelines Section 15088(c).) Please refer to the entirety of this Response B.4-26 with respect to those statements the commenter claims are supported by these articles.

Response B.4-27

This comment states that it "incorporate[s] our May 21, 2025, comments on the Draft Supplemental Environmental Impact Report (Exhibit C)."

As explained in Section 1.0 of the RPDEIR, the County circulated the draft Supplemental EIR for public review in April 2025, before the Court of Appeal issued its Opinion. By virtue of the County's decertification of the Centennial EIR in December 2025, that Supplemental EIR is now void and will not be considered as part of the Final Recirculated EIR. Importantly, the RPDEIR took a substantively and analytically different approach to the analysis of climate change than the draft Supplemental EIR. Accordingly, many of the commenter's May 21, 2025, comments are no longer at issue, and the commenter does not specify which of the May 21, 2025, comments it believes continue to apply to the analysis in the RPDEIR. Nevertheless, the County responds to the May 21, 2025, comments below, consolidating responses where the comments provide general background information and do not address the RPDEIR, using "2025 DSEIR" to reference the document related to the May 21, 2025, comments.

Response to Exhibit C-1

The Lead Agency disagrees with this comment's characterization of the Approved Project with Proposed Modifications as "sprawl development." To the contrary, and as discussed in the 2019 Final EIR's Response to Comment F.8-20, the Approved Project with Proposed Modifications has been situated and designed to promote regional "smart growth" planning principles established by the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the County's Antelope Valley Area Plan for the purpose of sustainably accommodating regional growth projections in a manner that reduces criteria pollutant and greenhouse gas (GHG) emissions and to promote public health. Indeed, the South Coast Air Quality Management District has determined that the Centennial Specific Plan "exemplifies [the County's] leadership in promoting sustainable communities development" and "will help reduce emissions from mobile sources, protect the public health from air pollution and achieve healthful air in the [South Coast Air] Basin" (see 2019 Final EIR Comment D.4-1). Moreover, in its lawsuit challenging the 2019 Final EIR, the commenter's claim that the Centennial Specific Plan is inconsistent with the RTP/SCS because it "promotes massive 'sprawl'" was rejected by the Superior Court and the commenter did not challenge that conclusion on appeal.

This comment also claims that the 2025 DSEIR's analysis of GHG emissions is "incomplete with gaps in the analysis" but the comment does not explain the basis for such claim and provides no supporting evidence. Rather, this comment merely claims that the 2025 DSEIR failed to "fully explain" or "detail" the following emission figures cited in the 2025 DSEIR:

(i) the 157,642 $MTCO_2e$/yr of GHG emissions that the 2025 DSEIR estimates will be generated by the Approved Project with Proposed Modifications,

(ii) 223,501 $MTCO_2e$/yr of GHG emissions that the 2025 DSEIR estimates the Approved Project with Proposed Modifications would generate if it were conservatively assumed that the Project will not achieve any GHG emission reductions due to electric vehicle use, and

(iii) the 500,000 $MTCO_2e$/yr of GHG emission reductions the Approved Project with Proposed Modifications is required to achieve under the Climate Resolve Settlement Agreement. Despite this comment's claim to the contrary, the 2025 DSEIR does clearly explain the GHG emission figures cited in this comment.

First, the 2025 DSEIR explained that the "Approved Project with Proposed Modifications would emit approximately 157,642 $MTCO_2e$ of GHG per year, after taking into account reductions associated with the applicable GHG reduction regulations and Mitigation Measures 21-1 through 22-2, as discussed in the 2019 EIR and the Updated Greenhouse Gas Calculations for the Centennial Project report set forth in Section 4.3 of Volume 3 of the 2019 EIR." 2025 DSEIR at 3.1-31. The Superior Court did not make findings about this GHG inventory calculation when it considered the legal adequacy of the 2019 Final EIR, and the commenter did not challenge that GHG inventory calculation on appeal.

To avoid confusion about the Project's emissions without newly enacted regulations, mitigation measures, or the Settlement Agreement measures, the current RPDEIR provided the Project's GHG inventory without any reductions, resulting in unmitigated GHG emissions of 247,101 MT per year of GHG. The commenter notes that this is an increase from the 157,642 MT per year of GHG identified in the 2025 DSEIR, but that is because the 157,642 MT per year of GHG accounts for mitigation measures and regulatory reductions that are not accounted for in the Project's unmitigated emissions of 247,101 MT.

Second, the 2025 DSEIR explained that "[t]o fulfill the Climate Resolve Settlement Agreement obligations, the Approved Project with Proposed Modifications has a contractual obligation to reduce GHG emissions by 500,000 metric tons per year, far exceeding what would be necessary to achieve 'net-zero' based on the annual reduction of 157,642 MT per year of GHG emissions that were identified in the 2019 EIR." 2025 DSEIR at 3.1-34.

In response to a comment by the commenter in May 2025, the Climate Resolve Settlement Agreement obligations that are quantifiable and not duplicative of regulation have been incorporated as RPDEIR mitigation measures. (RPDEIR at 2.2-51–2.2-52.)

Third, with regard to the 223,501 $MTCO_2E$/yr figure cited in this comment, the 2025 DSEIR explained:

> "In order to conservatively calculate the amount of reductions required to classify this project as net-zero as defined in the 2045 CAP, this analysis evaluates the reductions achieved via various GHG reductions measures required by the Settlement Agreement against a larger emissions inventory that was reported in the 2019 FEIR. The 2019 FEIR assumed an electric vehicle (EV) adoption rate of 50% by Project buildout. As explained in the 2019 FEIR, this assumption accounted for a reduction of 65,859 metric tones of CO_2e per year.
>
> If the 2019 FEIR had not assumed this 50% EV utilization rate in its inventory and instead relied on CalEEMod model defaults, the GHG inventory that would need to be reduced in order to meet net-zero requirements would equate to 223,501 MT of GHG per year, rather than the 157,642 MT per year of GHG emissions that were identified in the 2019 FIER as the Project's GHG emission inventory[,]"

The 2025 DSEIR provided Table 3.1-4 which calculated in one column, by emission source, the Approved Project's GHG emissions inventory as shown in the 2019 Final EIR, and in an adjacent column clearly calculates, by emission source, the Approved Project's GHG emissions inventory exclusive of the 65,859 $MTCO_2e$/yr of GHG reductions that would be achieved by Project-related EV use, which equals 223,501 $MTCO_2e$/yr.

The current RPDEIR is even more conservative in its evaluation of unmitigated Project emissions, increasing those emissions from 223,501 MT of GHG per year to 247,101 MT of GHG per year. The total unmitigated emissions from the 2019 Final EIR were 244,379 MT of GHG per year. Since then, electrical emissions have increased due to the Project's commitment to EV chargers, natural gas emissions slightly decreased from regulations, and area emissions decreased, also due to regulations. These adjustments resulted in emissions slightly increasing from 244,379 MT of GHG per year to 247,101 MT of GHG per year before any mitigation.

As this analysis demonstrates, there is no gap in the RPDEIR's analysis of GHG impacts, which includes the unmitigated emissions and reductions due to mitigation measures.

Response to Exhibit C-2 through C-10

Comments C-2 through C-10 in Exhibit C were submitted on the 2025 DSEIR, which is now void (see Response B.4-27). These comments provide general background information on the causes and effects of climate change, including quotations from reports by the Intergovernmental Panel on Climate Change, the National Academy of Sciences, the U.S. National Research Council, and the U.S. Environmental Protection

Agency (C-2 through C-6); describe the United States' contribution to global GHG emissions and the adequacy of national climate policy (C-7); describe the effects of climate change on California and cite AB 1279 and Executive Orders N-19-19 and N-79-20 (C-8); summarize case law and general principles regarding GHG and cumulative impact analysis under CEQA (C-9); and request preparation and recirculation of a revised EIR (C-10). These comments do not address the content, analyses, or conclusions of the RPDEIR, and no further response is required. These comments are noted and will be provided to County decisionmakers for their consideration.

The general information in these comments is consistent with the RPDEIR. The RPDEIR discloses that global climate change is caused primarily by GHG emissions from human activity and describes its effects, including rising temperatures, more frequent and intense extreme weather events, sea level rise, reduced snowfall and snowpack, changes in growing seasons and species distributions, and extreme heat conditions that threaten human health and welfare (RPDEIR pp. 2.2-9 through 2.2-11 and 2.2-26 through 2.2-28). The RPDEIR also describes the regulatory framework for reducing GHG emissions, including the County's 2045 Climate Action Plan (2045 CAP), which sets forth the County's path toward meeting the goals of AB 1279, as well as federal actions affecting vehicle emission standards (RPDEIR pp. 2.2-12 through 2.2-25). Executive Order N-19-19 directs actions by specific State agencies and does not apply to local governments or individual development projects. Because climate change impacts are inherently cumulative, the RPDEIR evaluates the Project's GHG emissions on both a project and cumulative basis (RPDEIR Sections 2.2 and 3.0) and evaluates the Project's consistency with plans, policies, and regulations adopted to reduce GHG emissions (RPDEIR pp. 2.2-52 through 2.2-59). With implementation of County-enforceable mitigation measures, the Project would achieve net-zero GHG emissions, and the impact would be less than cumulatively considerable with mitigation (RPDEIR pp. 2.2-46 through 2.2-52).

With respect to Comment C-10, since that comment was submitted, the Court of Appeal issued its Opinion, the County decertified the Centennial EIR and voided the draft Supplemental EIR, and the County prepared and circulated the RPDEIR. Please refer to Topical Response A, *Scope of Recirculated Partial Draft EIR*.

Response to Exhibit C-11

This comment suggests that the 2025 DSEIR (and presumably the RPDEIR) is incomplete and inadequate because it allegedly "refers to several different GHG emissions calculations" this comment claims are confusing and create uncertainty. Specifically, this comment cites (i) the 157,642 $MTCO_2e$/yr that was primarily based on analysis using the 2016 version of CalEEMod and supplemental studies in 2018[.]" (ii) "a 500,000 MT/Year target without an explanation of how or why that number was included [in the 2025 DSEIR] or its relevance to the proposed Project[,]" and (iii) "another estimate of GHG emissions [in the 2025 DSEIR of] 223,501 $MTCO_2e$/yr because of a different estimate of likely EV adoption." For the reasons discussed

below, this comment is mistaken and misrepresents the plain language of the 2025 DSEIR and also the analysis in the RPDEIR.

First, the 2025 DSEIR clearly explains that the "Approved Project with Proposed Modifications would emit approximately 157,642 $MTCO_2e$ of GHG per year, after taking into account reductions associated with the applicable GHG reduction regulations and Mitigation Measures 21-1 through 22-2, as discussed in the 2019 EIR and the Updated Greenhouse Gas Calculations for the Centennial Project report set forth in Section 4.3 of Volume 3 of the 2019 EIR." 2025 DSEIR at 3.1-31. The RPDEIR opted to present the Project's emissions in a format that would clarify the unmitigated emissions (RPDEIR at 2.2-35 through 2.2-46), emissions after applying mitigation measures derived from quantifiable Settlement Agreement commitments that will be enforceable by the County because they are mitigation measures (RPDEIR at 2.2-47 through 2.2-50), and non-duplicative mitigation measures carried forward from the 2019 Final EIR and 2025 DSEIR (RPDEIR at 2.2-50 through 2.2-51). Notably, the Superior Court did not find that the Project's GHG inventory calculation was inadequate when it considered the legal adequacy of the 2019 Final EIR, which is the basis of the Project unmitigated emissions calculation and the quantification of the non-Settlement Agreement mitigation measures.

Second, the 2025 DSEIR explained "how and why" the so-called "500,000 MT/Year target" was included in the 2025 DSEIR, despite this comment's claim to the contrary. 2025 DSEIR at 3.1-2; see 2025 DSEIR at 3.1-27. The RPDEIR takes a slightly different and more conservative approach. Rather than solely rely on the Settlement Agreement, the RPDEIR quantifies the measures from the Settlement Agreement that the RPDEIR recommends as mitigation measures and shows how those measures decrease the Project's unmitigated emissions. The RPDEIR then goes through the additional mitigation measures that the County should carry forward to ensure the Project has net zero GHG emissions. (RPDEIR at 2.2-35 through 2.2-52.) As the 2025 DSEIR also states, "[t]o fulfill the Climate Resolve Settlement Agreement obligations, the Approved Project with Proposed Modifications has a contractual obligation to reduce GHG emissions by 500,000 metric tons per year, far exceeding what would be necessary to achieve 'net-zero' based on the annual reduction of 157,642 MT per year of GHG emissions that were identified in the 2019 EIR." (2025 DSEIR at 3.1-34.)

Third, with regard to the 223,501 $MTCO_2E/yr$ figure cited in this comment, the 2025 DSEIR explained:

> "In order to conservatively calculate the amount of reductions required to classify this project as net-zero as defined in the 2045 CAP, this analysis evaluates the reductions achieved via various GHG reductions measures required by the Settlement Agreement against a larger emissions inventory that was reported in the 2019 FEIR. The 2019 FEIR assumed an electric vehicle (EV) adoption rate of 50% by Project buildout. As explained in the 2019 FEIR, this assumption accounted for a reduction of 65,859 metric tones of CO_2e per year.

> If the 2019 FEIR had not assumed this 50% EV utilization rate in its inventory and instead relied on CalEEMod model defaults, the GHG inventory that would need to be reduced in order to meet net-zero requirements would equate to 223,501 MT of GHG per year, rather than the 157,642 MT per year of GHG emissions that were identified in the 2019 FIER as the Project's GHG emission inventory[,]"

The 2025 DSEIR then sets forth Table 3.1-4 which calculated in one column, by emission source, the Project's GHG emissions inventory as shown in the 2019 Final EIR, and in an adjacent column clearly calculates, by emission source, the Approved Project's GHG emissions inventory exclusive of the 65,859 $MTCO_2e$/yr of GHG reductions that would be achieved by Project-related EV use, which equals 223,501 $MTCO_2e$/yr. The RPDEIR updated the unmitigated GHG emissions to account for the increased EV charging requirements, minor reductions to natural gas, and regulations that require the diversion of certain solid waste streams, resulting in an increase from 244,379 (2025 DSEIR, Table 3.1-3) to 247,101 (RPDEIR at 2.2-45). Then, in response to the commenters' comments on the 2025 DSEIR, the RPDEIR quantifies Settlement Agreement measures that, if the County opts to approve the Project, would be adopted as mitigation measures in a step-by-step process (RPDEIR at 2.2-46 through 2.2-50) rather than automatically applying 2019 Final EIR mitigation measures as was done in the 2025 DSEIR. Finally, to ensure that the Project would have net zero emissions, the RPDEIR adds additional mitigation measures, each of which is quantified. (RPDEIR at 2.2-50 through 2.2-52.) Thus, despite this comment's claim to the contrary, neither the 2025 DSEIR nor the RPDEIR includes multiple calculations of the Project's GHG emission inventory and the calculations it does include are not confusing and do not create uncertainty.

Finally, this comment suggests that the 2025 DSEIR's conclusions (and presumably the RPDEIR's conclusions) regarding the Project's impacts are defective because it relies on data that is allegedly "out-of-date." However, as the 2025 DSEIR explained:

> "This assessment of the GHG impacts of the Approved Project with Proposed Modifications is also conservative because the 2019 EIR assumed GHG reductions associated with project compliance with certain regulatory programs for reducing GHG emissions that have since been amended to impose more stringent energy efficiency requirements that will reduce project GHG emissions to a greater extent. For example, 2019 EIR's Updated GHG Calculations to into account project compliance with the 2019 Title 24 Building Energy Efficiency Standards. The Approved Project with Proposed Modifications however, must comply with the current 2022 Title 24 Building Energy Efficiency Standards, which would reduce the project's electrical consumption estimates for low-density residential and non-residential uses when compared to the 2019 Title 24 standards. 2025 DSEIR at 3.1-33."

As the RPDEIR explained:

> "Overall, the emission inventory for the Project is conservative. The Project's emission inventory does not account for GHG reductions associated with the Settlement Agreement's "Net Zero" GHG contractual obligations that will be reflected in the SA Mitigation Measures. These additional reductions are shown in Table 2.2-10, below. The analysis also does not account for the recently enacted GHG regulatory mandates that would reduce GHG emissions described above, such as the more stringent energy efficiency standards in the 2025 California Building Code. The analysis assumes that California will not implement its previously proposed Advanced Clean Trucks (ACT) regulation, Advanced Clean Cars II, or the Omnibus Low-NOx regulation.
>
> As explained above, this analysis relies on the GHG emissions calculated for the 2019 EIR using CalEEMod Version 2016.3.1 with additional inputs discussed above. CalEEMod Version 2016.3.1 relies on CARB's EMFAC2014 model. Emissions reductions for Mitigation Measures and Settlement Agreement Mitigation measures were modeled using EMFAC2017. Compared to EMFAC2017, EMFAC2014 predicts a higher GHG emission rate for vehicles, including light-duty passenger vehicles and trucks. This is primarily because EMFAC2017 incorporates updated ZEV market share and growth information and additional vehicle tailpipe and fuel efficiency regulations (including Phase 2 GHG standards and Senate Bill 1, The Road Repair and Accountability Act of 2017) compared to EMFAC2014 (CARB 2018). Specifically, the average vehicle emission rate used to estimate the Project's unmitigated mobile source emissions at full buildout in 2035 under EMFAC 2014 is 258 grams CO2e per mile, while the average vehicle emission rate used to estimate emission reductions from mobile source mitigation measures under EMFAC 2017 is 242 grams CO2e per mile. For light-duty vehicles, EMFAC2014 predicts a statewide average emission rate in 2035 of 224 grams of CO2e per mile whole EMFAC2017 predicts an emission rate of 223 grams CO2e per mile." (RPDEIR at 2.2-45 through 2.2-46.)
>
> EMFAC2025 has higher emission factors compared to EMFAC2014 and EMFAC2017. If both the Project's unmitigated mobile source emissions and reductions from mitigation measures addressing mobile source emissions were run with EMFAC2025, the Project's unmitigated mobile emissions would increase due to higher emission factors, but the emission reductions from the Project's on-site and off-site EV charger measures (and any other commitment that is reducing mobile related VMT) would have a corresponding increase. As electricity becomes cleaner due to state law requirements, the emission reduction from mitigation incentivizing EVs increases as well. Accordingly, re-running CalEEMod for unmitigated and mitigated emission scenarios with EMFAC2025 inputs would not alter the impact conclusion."

Thus, contrary to this comment's claims, the GHG emissions data upon which the 2025 DSEIR relied and the RPDEIR relies provides a good faith estimate of the Project's GHG emissions inventory that would be achieved using the current CalEEMod model.

Response to Exhibit C-12

The commenter expresses concern that the 2025 DSEIR relied on unspecified studies from 2021 and 2023 and did not address the potential impacts of the Trump administration's possible changed approach to vehicle emission and efficiency standards and the potential impact of those policy shifts on GHG emissions. The commenter asserts that the 2025 DSEIR should have included the most recent information about these potential changes in the regulatory environment, potential impacts on the Project's anticipated GHG emissions, and whether additional mitigation measures are needed as a result.

The 2025 DSEIR is no longer at issue (see Response B.4-27). With respect to the RPDEIR, the RPDEIR describes the federal revocation of California's Clean Air Act waivers (RPDEIR p. 2.2-13), and the Project's unmitigated GHG emissions inventory does not assume implementation of the Advanced Clean Trucks regulation, Advanced Clean Cars II, or the Omnibus Low-NOx regulation (RPDEIR p. 2.2-45). The RPDEIR then shows how each mitigation measure reduces those unmitigated emissions to achieve net-zero GHG emissions (RPDEIR pp. 2.2-47 through 2.2-52). The commenter raises the same concern regarding the RPDEIR in Comment B.4-28; please refer to Response B.4-28 for further discussion. No additional analysis or mitigation is required.

Response to Exhibit C-13

This comment questions whether the Climate Resolve Settlement Agreement is a feature of the Project or a mitigation measure. The Climate Resolve Settlement Agreement is a contractual obligation of the Project but by itself is not enforceable by the County. Accordingly, the RPDEIR treats quantifiable Settlement Agreement measures as mitigation measures and if the County approves the Project, these measures would be adopted as mitigation and be enforceable by the County. (RPDEIR at 2.2-47 through 2.2-52.) The RPDEIR "net-zero" analysis is based on an annual reduction of 247,101 MT per year of GHG emissions through mitigation, both from the Settlement Agreement and other measures. (RPDEIR at 2.2-47 through 2.2-52.)

As further explained in the RPDEIR, page 2.2-24, on June 25, 2024, the Board of Supervisors updated the Air Quality Element of the Los Angeles County General Plan to, among other things, add AQ Policy 3.1, which requires the County to:

> Facilitate the implementation and maintenance of the Climate Action Plan through future County programs to ensure the County reaches its climate action and greenhouse gas emission reduction goals, and

> consider projects with an enforceable legal obligation to achieve "net zero" greenhouse gas (GHG) emissions, including by voluntary agreement to resolve litigation or with a government agency, to help the County achieve the long-term goals of the CAP.

Also on June 25, 2024, the Board of Supervisors approved the 2045 CAP as a sub element of the Air Quality Element of the Los Angeles County General Plan, which approval was not challenged. (RPDEIR at 2.2-24.) The 2045 CAP sets forth the County's path toward meeting the goals of AB 1279 and achieving carbon neutrality for unincorporated areas of the County and provides a policy framework to guide future County actions so that the County can reach its GHG emissions reduction target. (*Id*.) As explained on pages 2.2-24 and 2.2-25 of the RPDEIR, Appendix F of the CAP outlines how CEQA analysis of GHG impacts for "net zero" projects can be streamlined, as follows:

> If the project would achieve net-zero GHG emissions, the project is considered to comply with the 2045 CAP and the analysis is complete.

As further explained in the RPDEIR, the Project with mitigation is consistent with the Air Quality Element of the General Plan, including its AQ Policy 3.1, the 2045 CAP, the Southern California Association of Governments' ("SCAG") 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS"), and SCAG's 2024-2050 RTP/SCS. On the basis of a quantified net-zero analysis and this consistency with plans adopted through an unchallenged public review process, the RPDEIR determined that the GHG impacts of the Project with mitigation measures would be less than cumulatively considerable. (RPDEIR at 2.2-46 through 2.2-80.)

Response to Exhibit C-14

The comment summarizes case law and legal standards concerning CEQA mitigation measures. These citations are noted for the record and will be provided to County decisionmakers for consideration. The comment does not address the content, analyses, or conclusions of the RPDEIR. No further response is required.

Response to Exhibit C-15

This comment questions whether the Climate Resolve Settlement Agreement is a feature of the Approved Project with Proposed Modifications or a mitigation measure. The Climate Resolve Settlement Agreement is a contractual obligation of the Project that is fully enforceable by Climate Resolve.

Commenter speculates that Climate Resolve may not actually enforce the Settlement Agreement but provides no facts to support its claim. Nevertheless, the RPDEIR's conclusion that the Project will have net zero GHG emissions does not rely on the Settlement Agreement as a contract but on the quantified measures within the Settlement Agreement adopted as County-enforceable mitigation. Instead, the

RPDEIR quantifies certain Settlement Agreement requirements and makes them mitigation measures, which would be included in the MMRP and would be enforced by the County (RPDEIR at 2.2-59 through 2.2-80.) If the County approves the Project and adopts the RPDEIR mitigation measures, including those relied on to mitigate the Project's GHG emissions, the County can independently enforce those measures through the MMRP.

To the extent this comment claims that RPDEIR's exclusion of the Settlement Agreement measures from the MMRP violates the legal principles set forth in *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645 ("*Lotus*"), the comment is mistaken. At issue in *Lotus* was the adequacy of an EIR analyzing a roadway expansion project adjacent to old growth redwood trees. (*Lotus* at 647.) The impact at issue in Lotus was potential damage to the structural root zones of trees potentially caused by excavation and placement of impervious material or fill over the roots. (*Id*. at 649.) The EIR determined that such impacts would be insignificant due to the implementation of avoidance and minimization measures that were incorporated into the roadway improvement project but were not made mitigation measures of the project. (*Id.* at 650–651.) The *Lotus* court held that the EIR did not comply with CEQA because the EIR failed to separately identify and analyze the significance of the impacts to the root zones before proposing measures to reduce those impacts. (*Id*. at 657.)

The RPDEIR, on the other hand, sets forth the GHG emission impacts that would be caused by the Project in the absence of the GHG reduction measures required by the Settlement Agreement measures and other mitigation measures and determines that, in the absence of any mitigation, the Project would result in 247,101 $MTCO_2e$/yr of GHG emissions. (RPDEIR at 2.2-35 through 2.2-46.) The RPDEIR then walks through each of the itemized, quantifiable GHG reduction measures required by the enforceable Settlement Agreement (and if the Project is approved, mitigation measures) to describe the GHG reductions that would be achieved by each such measure. (RPDEIR at 2.2-46 through 2.2-50.) The RPDEIR then further walks through additional mitigation measures required to ensure the Project meets net zero emissions assuming a very conservative unmitigated emissions scenario. (RPDEIR at 2.2-50 through 2.2-52.) The analysis thus demonstrates how such measures together achieve GHG reductions that exceed all of the GHG emissions generated by the Project, and the RPDEIR is clear that the measures from the Settlement Agreement required to get to net zero emissions are mitigation measures, not project features. (RPDEIR at 2.2-79 through 2.2-80.) The RPDEIR is unlike the EIR at issue in *Lotus*, where it was unclear whether project features were relied on as mitigation that might escape inclusion in that project's mitigation monitoring and reporting program.

Response to Exhibit C-16

This comment claims that the 2025 DSEIR is insufficient because it purportedly fails to explain how the Project's inclusion of battery storage and microgrid technology would reduce the Project's GHG emissions. Such analysis is not required, however,

because the RPDEIR does not assume that the Project would include battery storage beyond that required by Title 24 and does not assume that microgrid technology would reduce any GHG emissions generated by the Project, and the RPDEIR does not take credit for any such reductions. As explained in the RPDEIR, Chapter 1.0, *Introduction* page 1-5, Section 1.3, Proposed Summary, the Project modifications would amend Centennial Specific Plan Table 2-16 to add microgrid electrical distribution systems as permitted land uses. (RPDEIR at 1-5.) The RPDEIR does not assume that a microgrid would actually be constructed within the Specific Plan area, however, and thus it does not assume that microgrid technologies will reduce the GHG emissions of the Project. Moreover, because this use would be permitted only within the Project development footprint assumed by the 2019 Final EIR, the environmental effects of constructing such uses are already covered by the environmental impact analysis set forth in the 2019 Final EIR. (RPDEIR at 1-5.) Please refer also to Responses B.5-4 through B.5-11.

Response to Exhibit C-17

The comment states a conclusion and does not address the content, analyses, or conclusions of the 2025 DSEIR. No further response is required.

The commenter next states that the RPDEIR's GHG emissions estimate is outdated because it relies on 2016 GHG modeling and then "adds and subtracts so many GHG sources and sinks that it is unclear why the [RPDEIR] relied on the 2016 model. The County opted to rely on the emissions estimated by the 2016 version of the State's emission estimator model ("CalEEMod"), which was used in the 2019 Final EIR, because the Superior Court upheld the emission inventory in the 2019 Final EIR and the 2016 version of CalEEMod offers a conservative evaluation of the Project's unmitigated emissions. Since 2016, the State has passed regulations that have decreased emissions associated with a project like Centennial, including requiring more energy efficient building under the Building Code (Title 24), the current version of which is known as 2025 Title 24. Thus, remodeling the Project's unmitigated emissions would have resulted in a smaller inventory that would have to be reduced to meet net zero GHG emissions.

As the commenter notes, minor adjustments were made to the CalEEMod output to account for the Project's increase in energy use due to the additional EV chargers, decrease in energy use due to 2019 Title 24, and decrease in emissions due to landfill diversion requirements under the Integrated Waste Management Act. Substantially similar adjustments were made in the 2019 Final EIR. (Compare RPDEIR at 2.2-45 with 2019 Final EIR at 4-321.) Specifically, to account for the increase in energy from EV chargers and decrease in energy due to 2019 Title 24 building code energy efficiency requirements, the 2019 Final EIR added 5,856 MTCO2e per year, whereas the RPDEIR added 7,831 MTCO2e per year to account for the additional EV chargers required in the Project. Similarly, both the 2019 Final EIR and RPDEIR subtracted 222 MTCO2e per year from GHG emissions from natural gas to account for 2019 Title 24 energy efficiency requirements. The final adjustment was to solid waste, where both the RPDEIR and the 2019 Final EIR reduced emissions by 5,107 MTCO2e per year to account for waste diversion requirements.

The commenter also states that "the RPDEIR now estimates the Project's emissions at 247,101 MTCO2e/year – significantly higher than the 157,642 MTCO2e/year estimate provided in the 2019 EIR." This is incorrect. The RPDEIR provides the analysis to show that the Project's unmitigated emissions are 247,101 MTCO2e per year. The 2019 Final EIR disclosed that the Project's unmitigated emissions were 244,379 MTCO2e per year. These are substantially similar estimates of the Project's unmitigated emissions. The slightly higher emissions in the RPDEIR are a result of the analysis being more conservative about the electrical power use of the Project.

The commenter next notes that the "RPDEIR improbably concludes that the Project's mitigation will offset such a quantity of emissions that the Project will 'reduce more GHG emissions than it would emit'" and that is not possible without significant amount of offsite reductions. The Project's mitigation measures *do* include significant amounts of offsite reductions, totaling 98,352 MTCO2e per year. (RPDEIR at 2.2-49.) The offsite reductions include EV grant programs for public agency service fleets and community organizations, truck chargers at the Tejon Ranch Commerce Center, EV chargers installed in disadvantaged communities, and the elimination of natural gas at the Grapevine project. (*Id.*) These offsite reductions, together with the onsite mitigation measures, allow the Project to achieve net-zero GHG emissions with a margin of approximately 9,814 MTCO2e per year. (RPDEIR at 2.2-51.)

The commenter states that the GHG reductions "may overestimate the likely reductions" but does not provide any specific information that conflicts with the substantial information supporting the analysis in the RPDEIR. While the commenter thinks the detailed calculations in Appendix D of the RPDEIR should be in the chapter, there is no requirement for that organization. CEQA allows the lead agency discretion in organizing its analysis and EIR chapters. (CEQA Guidelines Section 15120(a)). The RPDEIR provides the information in a clear and organized format.

Response B.4-28

This comment refers back to comments made by commenter in its May 21, 2025, letter, and reiterates its comment that the adjustments made to the Project's unmitigated emissions are "unclear." These comments are addressed in Response B.4-27.

Some adjustments reflect regulatory requirements and inputs applied to the unmitigated inventory (RPDEIR 2.2-35 to 2.2-40); the remainder are mitigation reductions shown separately in Table 2.2-10 and at 2.2-50 to 2.2-51. CEQA requires exactly the type of transparent analysis that the RPDEIR GHG chapter provides, namely, disclosing unmitigated emissions and then showing how the mitigation measures reduce emissions to meet or exceed a threshold.

The commenter also states that the RPDEIR must disclose CalEEMod adjustments in the RPDEIR chapter rather than an appendix, citing *Santa Clarita Organization for Planning the Environment v. County of Los Angeles* (2003) 106 Cal.App.4th 715, 723 ("*SCOPE*"). *SCOPE* does not hold that detailed information regarding adjustments to a technical model must be in a

Draft EIR chapter rather than a technical appendix. The flaw in the presentation of information in the Draft EIR at issue in *SCOPE* was that it referenced an appendix with a water supply analysis that conflicted with the statements regarding supply in the Draft EIR, which itself did not contain relevant information about the reliability of the proposed water supply. *Id.* at 722–723. The Centennial EIR, on the other hand, includes CalEEMod adjustments in an appendix that supports rather than contradicts the assertions in RPDEIR Section 2.2. The CalEEMod Outputs supporting the calculations are found in the Draft EIR, Appendix 5.11-A, and 2019 Final EIR, Appendix 5.11-E.

The commenter next states that the RPDEIR does not explain where it obtained its estimate of 35,123 replacement trees (Draft EIR at p. 5.21-54) or how the Project will ensure survival of those trees or whether the modeling accounts for tree species and lifespan. The RPDEIR states that the replacement trees are required by the County Tree Planting Ordinance. (RPDEIR, p. 2.2-39.) The estimated number of trees also is supported by the Specific Plan, which requires a Master Street Tree Program, compliance with the County's Subdivision Ordinance tree planting standards, additional minimum tree planting requirements for subdividers, and minimum requirements for parking lot trees. (Specific Plan, p. 2-72, 2-75.) The Specific Plan also contains provisions to replace oak trees, encourage the planting of new oak trees beyond replacement requirements, and requires a forester to oversee the maintenance of new oak trees. (*Id.*, pp. 2-78, 3-98.) MM 7-11 requires the creation of mixed oak woodlands with a 15-year monitoring requirement and requirement for long-term preservation. Finally, this estimate is not new information and was included in the Project's prior environmental analyses. (Draft EIR, at p. 5.21-54.)

With respect to tree survival, the 35,123 trees are required by the County's Tree Planting Requirements (Los Angeles County Code, Title 22, Chapter 22.126), and compliance with that ordinance is required by MM 21-20 (RPDEIR at 2.2-78), which the County will monitor and enforce through the MMRP. Specifically, Chapter 22.126 requires that planted trees be supported with soft, mold-resistant staking and ties until self-supporting, equipped with irrigation systems when not planted in turf, and replaced if they fail to survive. With respect to species and lifespan, the sequestration estimate uses the CalEEMod default sequestration factor, which is not species-specific; this is a limitation of the estimate. As explained in the RPDEIR, the one-time loss of carbon stored in the removed grassland (27,653 MTCO2e) is amortized over 30 years because the vegetation loss would occur concurrently with construction, the emissions of which are also amortized over 30 years, while the sequestration from new trees (24,867 MTCO2e) would occur more slowly and is conservatively amortized over 100 years, consistent with IPCC recommendations (RPDEIR at 2.2-38–2.2-39 & Table 2.2-3). Using the shorter period for the loss and the longer period for the gain increases the net annual vegetation emissions attributed to the Project. Net vegetation-related emissions are approximately 673 MTCO2e per year, or about 0.3 percent of the Project's 247,101 MTCO2e per year of unmitigated emissions (RPDEIR Table 2.2-9), so uncertainty regarding tree species, survival, or lifespan would not materially affect the RPDEIR's conclusions.

The commenter states that the RPDEIR needed to disclose actual construction dates rather than rely on older dates, noting that by doing so, the emission analysis is likely conservative

due to regulatory updates that are anticipated to reduce emissions, including updates to construction equipment requirements and Building Codes. The RPDEIR states construction will start after 2026 and buildout will be after 2045 (p. 2.2-37); the modeled years are 2016 and 2035. Construction is 4,490 MT/yr amortized (about 1.8% of the inventory), and it can be expected that later years would use cleaner equipment, despite current uncertainty about federal regulations. The RPDEIR makes a good-faith effort to disclose the Project's unmitigated and mitigated emissions, which fulfills CEQA's informational requirements.

The commenter expresses concern that the RPDEIR does not address the potential impacts of the Trump administration's possible changed approach to vehicle emission and efficiency standards and the potential impact of those policy shifts on GHG emissions. To the contrary, the administration's changed approach is one reason that the County opted to rely on a 2016 version of CalEEMod for the Project's unmitigated emissions. CalEEMod Version 2016.3.1 relied on CARB's EMFAC2014 model and this model was used for the Project's unmitigated emissions. Emissions reductions for Mitigation Measures and Settlement Agreement Mitigation measures were modeled using EMFAC2017. Neither EMFAC2014 nor EMFAC2017 accounted for Advanced Clean Cars II, Advanced Clean Trucks, the Heavy-Duty Omnibus, Zero-Emission Airport Shuttle, or Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provision. See also Response to Exhibit C-11 under Response B.4-27 regarding differences between different versions of the EMFAC model.

The commenter states that the inputs into CalEEMod should be based on the "Project's actual specifications." The Project is a specific plan. Because the Project is a plan, certain Project details are unknowable. CEQA Guidelines Section 15146 provides that the degree of specificity in an EIR should correspond to the underlying activity, meaning that a plan-level EIR may be less detailed than a project-level EIR. Additionally, the Project is anticipated to be constructed over 20 years, during which time there could be changes to regulations and technology that are unknowable and unforeseeable today. For this reason, the RPDEIR takes a conservative approach rather than speculate on advances that may or may not occur in the future.

Response B.4-29

The commenter states that the RPDEIR is inconsistent regarding the Project's natural gas GHG emissions. This comment confuses the Project's unmitigated emissions with the Project's mitigated emissions. The RPDEIR distinguishes between the Project's unmitigated and mitigated emissions. To clarify, the unmitigated emissions do not account for the Settlement Agreement mitigation measures. That can be seen in the Project's unmitigated emission inventory on page 2.2-45 of the RPDEIR. The mitigation measures include the Settlement Agreement commitment for no natural gas, as discussed on RPDEIR page 2.2-48 and shown in the summary of reductions from Settlement Agreement Mitigation Measures on RPDEIR page 2.2-49. Accordingly, the RPDEIR is consistent about the fact that absent mitigation the Project could use natural gas but with mitigation it will not use natural gas for residential uses, including fireplaces, and will not use natural gas for non-essential non-residential uses.

The County notes that MM 11-3 from the Centennial EIR, which is carried forward in the RPDEIR wildfire mitigation measures (RPDEIR pp. 2.3-155 and 2.3-156), limits natural gas fireplaces to a total of 13,954 (consistent with the fireplace assumption in the unmitigated inventory, RPDEIR p. 2.2-39), whereas SA MM-3 prohibits all fossil fuel fireplaces. To eliminate this inconsistency, MM 11-3 has been revised to remove the allowance for natural gas fireplaces and to reference SA MM-3, as shown in Section 3.0, *Corrections, Clarifications, and Additions to the RPDEIR, and Draft EIR, 2019 Final EIR, and Consolidated 2019 Final EIR as Relevant to the RPDEIR,* of this Final Recirculated EIR. This revision conforms MM 11-3 to the more protective requirement already analyzed in the RPDEIR and does not result in any new or more severe impact.

Response B.4-30

The commenter states that due to how the Project emissions are modeled, "it is unknown what the Project's emissions reductions must be to produce a net zero Project." The commenter appears to be confused by statements about the Project's unmitigated emissions on RPDEIR page 2.2-39, which the commenter appears to believe apply to the mitigated scenario. That is not the case. The RPDEIR was organized so that the public could understand the magnitude and significance of the Project's unmitigated emissions, as detailed on RPDEIR pages 2.2-35 through 2.2-46, and evaluate the mitigation measures imposed to reduce those unmitigated emissions to a less than significant level, the details of which are on RPDEIR pages 2.2-47 through 2.2-51. The step-by-step accounting of how the Project's mitigation measures reduce the Project's unmitigated emissions allows the public to know what reductions are taken to produce a net zero Project. Specifically, the Project's unmitigated emissions are 247,101 MTCO2e per year. The SA Mitigation Measures reduce emissions by 233,317 MTCO2e per year (134,965 MTCO2e per year onsite and 98,352 MTCO2e per year offsite), leaving 13,784 MTCO2e per year. The quantified PDFs and mitigation measures carried forward from the 2019 Final EIR reduce emissions by an additional 23,598 MTCO2e per year (transportation, 18,037; energy, 2,195; water, 3,184; vegetation, 108; and area sources, 74), resulting in net emissions of approximately –9,814 MTCO2e per year (RPDEIR Table 2.2-10 and pp. 2.2-47 through 2.2-51.) Additional mitigation measures carried forward from the 2019 Final EIR were not quantified, but if they were quantified, would likely further reduce emissions.

Response B.4-31

The commenter questions the RPDEIR's conclusion that the Project can reduce more GHG emissions than it will emit. As explained in the RPDEIR, the Project achieves net-zero GHG emissions with a margin of approximately 9,814 MTCO2e per year (about 4 percent of the Project's unmitigated emissions). That result depends on both onsite measures and offsite measures. See Response to Comment B.4-30 for the reductions. The commenter's specific questions about some of these offsite mitigation measures are addressed in the following paragraphs.

The commenter believes the reduction taken for EV chargers is too large and does not account for the phased buildout of construction. The Project's unmitigated emission

inventory assumes 4% EV penetration, which is relatively low. The emission reductions for providing EV chargers assume that because the Project is providing charging, residents and employees will be more likely than without having an available charger to purchase an electric vehicle, with 50% EV penetration in the Project at Project buildout over 20 years from when construction begins. The RPDEIR text identifies reductions of 51,462 MTCO2e per year and 72,428 MTCO2e per year for residential and non-residential EV chargers, respectively (RPDEIR pp. 2.2-47 and 2.2-48). However, as explained in footnote 2 to Table 2.2-10, the onsite mobile-source reductions credited in the net-zero calculation were conservatively scaled down to 65,859 MTCO2e per year (37,377 + 26,557 + 1,925 MTCO2e per year), which equals the reduction associated with the 50 percent EV utilization rate assumed in the 2019 Final EIR. The same scaling applies to the school and transit bus incentives in SA MM-13: the RPDEIR text identifies 3,730 MTCO2e per year (RPDEIR p. 2.2-48), but Table 2.2-10 credits 1,925 MTCO2e per year. The net-zero conclusion therefore *does not* rely on the larger estimates in the text. The text on RPDEIR pages 2.2-47 and 2.2-48 has been revised to match Table 2.2-10, as shown in Section 3.0, Corrections, Clarifications, and Additions to the RPDEIR*, and Draft EIR, 2019 Final EIR, and Consolidated 2019 Final EIR as Relevant to the RPDEIR*.

As stated in the 2019 Final EIR, Psomas reviewed third-party, independent projections of EV adoption over time, including studies published by Bloomberg New Energy Finance (BNEF),[10] the International Monetary Fund (IMF),[11] the University of California Davis Institute for Transportation and Development Policy,[12] and the University of California Berkeley Center for Entrepreneurship and Technology.[13] Global projections in the BNEF report show that by 2040, it is expected that 55 percent of new car sales will be electric. The University of California, Berkeley report's estimates for EV adoption in the U.S. show EVs achieving up to "a 46% market share by 2030".[14] The IMF working paper shows that the share of EVs in the U.S. vehicle stock would be 30 percent by 2027, and by 2042 the share would be over 90 percent.[15] Although the projections from each report vary, they all point toward high levels of EV sales and adoption in the U.S. in the near future. Importantly, these reports are focused on EV sales nationwide and are assumed to be a conservative estimate for California's electric car sales.

10 Bloomberg New Energy Finance, Electric Vehicle Outlook, Executive Summary, 2018, available at https://europeanlithium.com/electric-vehicle-outlook-2018-bloomberg/, last accessed September 13, 2026.

11 R. Cherif et al, Riding the Energy Transition: Oil Beyond 2040, International Monetary Fund Working Paper No. 17/120, May 22, 2017, available at https://www.imf.org/-/media/files/publications/wp/2017/wp17120.pdf, accessed September 2026.

12 L. Fulton et al., Three Revolutions in Urban Transportation, University of California at Davis Institute for Transportation and Development Policy, May 3, 2017, available at https://itdp.org/2017/05/03/3rs-in-urban-transport/, accessed September 2026.

13 T, Becker et al., Electric Vehicles in the United States A New Model with Forecasts to 2030, U.C. Berkeley Center for Entrepreneurship & Technology, Technical Brief Number: 2009.1.v.2.0, August 24, 2009, available at https://globaltrends.thedialogue.org/wp-content/uploads/2014/12/Electric-Vehicles-in-the-United-States-A-New-Model-with-Forecasts-to-2030.pdf, accessed September 2026.

14 T, Becker et al. 2009.

15 R. Cherif et al. 2017.

Other reports also support the assumption of 50 percent EV penetration at Project buildout. As Elmallah et al. noted:

> Executive order N-79-20 (Office of Governor Gavin Newsom 2020) banned the sale of internal combustion engine vehicles in California after 2035. As vehicles have a less than 15 years turnover rate, this suggests that all or nearly all light-duty vehicles in California in 2050 will be net-zero, and we assumed that many of them will be EVs.[16]

Other researchers reached similar conclusions:

> Looking out to 2030, the range of views on EV sales penetration is relatively large, with a low projection of 11 percent and a high of 63 percent. Projections for 2050 range from 31 percent to 99.5 percent. The higher penetration levels depend on the degree of carbon constraint in the forecast; NZ [net zero] and carbon-constrained estimates have notably higher percentages, with all NZ and carbon-constrained forecasts going above 90 percent by 2050.[17]

The County acknowledges that the reports cited above predate recent federal actions affecting vehicle emission standards and EV incentives, including the June 2025 congressional resolutions disapproving California's Clean Air Act waivers for the Advanced Clean Trucks, Advanced Clean Cars II, and Omnibus Low-NOx regulations, the U.S. EPA's February 2026 rule eliminating federal vehicle GHG emission standards (RPDEIR pp. 2.2-12 and 2.2-13), and the expiration of the federal EV tax credit on September 30, 2025. Those federal actions are the subject of ongoing litigation, the outcome of which cannot be predicted, and federal policy may change again over the Project's multi-decade buildout, which will extend well beyond the current federal administration. As described below, EV sales in California have continued to grow despite these federal actions, and the Project's 50 percent EV assumption is further supported by the Project's own EV-related mitigation measures. In addition, the Project's unmitigated emissions inventory does not assume implementation of the Advanced Clean Trucks, Advanced Clean Cars II, or Omnibus Low-NOx regulations (RPDEIR at 2.2-45).

Projections for California show increases in EV utilization, with California leading in U.S. for Zero-Emission Vehicle (ZEV) sales. Of all ZEVs sold in 2017 in the U.S. (through October 2017), California sales made up more than half of all U.S. sales, and as of January 2018, the number of ZEVs in California made up half of the total ZEVs in the U.S.[18] In addition to the existing trend in increasing EV market share, Executive Order B-48-18, which went into

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16 Salma Elmallah et al, Can distribution grid infrastructure accommodate residential electrification and electric vehicle adoption in Northern California?, Environmental Research: Infrastructure and Sustainability (2022), available at Berkeley-LabCan-distribution-grid-infrastructure-accommodate-residential-electrification-and-electric-vehicle-adoption-in-Northern-California.pdf, accessed September 2026.

17 Marianne Kah et al, Forecasts of Electric Vehicle Penetration and Its Impact on Global Oil Demand, Center on Global Energy Policy and School of International and Public Affairs, Columbia University (Dec. 2022), available at EV-Survey-CGEP_Report_110723.pdf, accessed September 2026.

18 Next 10, The Road Ahead for Zero-Emission Vehicles in California, January 2018, available at: http://next10.org/sites/default/files/ca-zev-brief.pdf, accessed September 2026.

effect January 2018, sets a target of 5 million ZEVs in California by 2030.[19] According to CARB, this new order would require 40 percent of all vehicles sold in 2030 in California to be clean.[20] As of September 2024, California had the greatest number of electric vehicles in the country, at approximately 35 percent of vehicles nationwide.[21]

In January 2026, the California Energy Commission announced that California surpassed 2.5 million cumulative new zero-emission vehicle sales in 2025, and since the end of 2019, cumulative new EV sales in California alone have grown over 300 percent.[22] In the second quarter of 2026, California had its highest new EV market share since the surge in EV sales spurred by the sunsetting of the federal EV tax credit in the third quarter of 2025.[23] During that quarter, Californians purchased 86,857 new EVs, comprising 19.1 percent of total new light-duty vehicle sales in the state.[24] While the EV market share of new vehicles sold dipped by 2.4 percent as compared to the same period last year when the federal tax credit was still available to consumers, the second quarter of 2026 saw an increase in market share by 3.3 percent relative to the prior quarter.[25] The second quarter of 2026 also was a record-setting quarter for the used EV market, which nationally saw a 29 percent increase from the same period last year.[26] Finally, in that quarter, California established a new state-wide rebate for first-time EV buyers, beginning the summer of 2026, with up to $3,500 in incentives available per qualified vehicle; this incentive partially replaces the expired federal rebate.[27]

Based on this review, an EV use rate of 50 percent was determined to appropriately characterize the Project's EV utilization at Specific Plan buildout. This assumption is particularly appropriate for the Project, which must comply with mitigation measures that incentivize EV adoption, including measures that require the Project to provide at least Level 2 chargers (SA MM-6 through SA MM-8) for onsite residential and non-residential uses, a requirement to provide chargers for medium-duty and heavy-duty vehicles (SA MM-9), a requirement to provide $3,750,000 for businesses to purchase EV medium-duty and heavy-duty trucks (SA MM-11), a requirement to provide $1,500,000 for public agency fleet EVs (SA MM-12), a requirement to provide $500,000 for EVs for community agencies and organizations (SA MM-12), a requirement to provide $8,000,000 for electric school and

19 State of California, Governor Brown Takes Action to Increase Zero-Emission Vehicles, Fund New Climate Investments, January 2018, available at https://archive.gov.ca.gov/archive/gov39/2018/01/26/governor-brown-takes-action-to-increase-zero-emission-vehicles-fund-new-climate-investments/index.html, accessed September 2026.

20 J.J. Cooper, California governor pushes for 5 million zero-emission cars, January 2018, available at https://abc7news.com/post/california-governor-pushes-for-5-million-zero-emission-cars/2993820/, accessed September 2026.

21 U.S. Department of Energy, Electric Vehicle Registration by State, September 2024, available at https://afdc.energy.gov/data/10962, accessed September 2026.

22 California Energy Commission, California Surpasses 2.5 Million ZEV Sales, Jan. 20, 2026, available at https://www.energy.ca.gov/news/2026-01/california-surpasses-25-million-zev-sales, accessed September 2026.

23 Veloz, Q2 2026 EV Market: A Period of Renewed Growth and Strategic Realignment, July 28, 2026, available at https://www.veloz.org/q2-2026-ev-market-a-period-of-renewed-growth-and-strategic-realignment/, accessed September 2026.

24 *Id.*

25 *Id.*

26 *Id.*

27 *Id.*

transit buses and vans (SA MM-13), and a requirement to install 5,000 operable Level 2 or higher-capacity EV chargers in disadvantaged communities (SA MM-14).

The commenter questions the 50% reduction for the installation of non-residential EV chargers because "residential development will likely predate most of the Project's commercial development, and given that Project residents will likely utilize their home EV chargers much more than EV chargers located in commercial areas." The GHG reductions taken for installing non-residential EV chargers are to GHG emissions from cars and light-duty trucks associated with the non-residential uses. Similarly, the GHG reductions taken for installing EV chargers in residential buildings apply to the mobile emissions associated with residential buildings. To the extent that project residents are also project workers, that would reduce the assumed GHG from driving by lowering the commute distance, which reduces the assumed use of non-residential EV chargers. As noted in footnote 2 of Table 2.2-10 in the RPDEIR, the estimated reductions from the itemized GHG mitigation measures are outlined in SA Measures #1 through #4 and represented in Tables 1 through 7 of Appendix D of the RPDEIR. The Centennial EIR calculated that 65,859 MT CO2e per year would be reduced by assuming an EV utilization rate of 50% at Project buildout. The numbers reflected in Table 2.2-10 of the RPDEIR for reductions from the on-site mobile commitments (presented in Tables 3, 5, and 6 of Appendix D) have been conservatively scaled down to ensure that reductions attributed to on-site mobile measures do not exceed this value. Reductions from itemized GHG mitigation measures also include GHG reductions, including those associated with the SA mitigation measure prohibiting fossil fuel fireplaces at the Project, which were expected to emit 11,056 MT CO2e/yr.

The commenter questions whether net zero will be achieved early in the Project buildout. Specifically, the commenter states that during the first years of buildout, not all the EV chargers will be installed and therefore the full amount of reductions shown in the RPDEIR will not occur. While the commenter is correct that not all the EV chargers will have been installed when the Project is not fully constructed, the operational emissions associated with the unconstructed buildings also would not exist. Accordingly, both the unmitigated emissions and reductions to emissions from mitigation measures requiring the installation of onsite EV chargers would be proportionally lower. The mitigation measures also account for reductions that will be needed as the Project's operational emissions increase due to buildout. For example, the Project must install 5,000 operable Level 2 or higher-capacity EV chargers in disadvantaged communities located within the South Coast AQMD boundary, with the first EV charger installed prior to issuance of a certificate of occupancy for the 4th dwelling unit in the Project, with one additional EV charger installed for every 4th dwelling unit thereafter. (RPDEIR at 2.2-81.) Similar phasing requirements are found in SA MMs 11, 12, and 13. The fact that the Project may be constructed over a longer period of time does not undercut the effectiveness of the Project's mitigation. As noted above, the longer it takes the Project to reach full buildout, the more likely the unmitigated emissions will be lower due to regulatory changes (such as the Renewable Portfolio Standards) and technological changes, and the reduction from the mitigation measures will remain the same or could see increases, particularly if EV charging technology improves.

The commenter further states that the Project should not take credit for reducing emissions from natural gas fireplaces because no fireplaces were assumed in the unmitigated emissions. The information in the RPDEIR contradicts the commenter's statement. The unmitigated emissions inventory assumes that the Project would have natural gas fireplaces. (RPDEIR at 2.2-39.) SA MM-3 prohibits natural gas fireplaces. (RPDEIR at 2.2-48.) The reduction in natural gas emissions from the unmitigated emission inventory is explained in the RPDEIR and is appropriate.

The commenter asks how future use of fossil-fueled devices such as fire pits can be prevented. Wood burning fireplaces are prohibited by MM 11-3. (RPDEIR at p. 2.3-155.) Fire pits and outdoor freestanding fireplaces are prohibited throughout the Project by MM WILD-4 (RPDEIR at 2.3-158–159). The County can enforce this mitigation measure and the mitigation measures prohibiting natural gas at any time, including after the Project is constructed.

The commenter questions the GHG reduction taken for the commitment to not install natural gas infrastructure at the Grapevine development because the commenter is not sure the commitment is in addition to existing regulations and notes that some apartments have already been constructed. First, no California law prohibits the installation of natural gas infrastructure. In fact, the 9th Circuit held that federal Energy Policy and Conservation Act preempted a city ordinance prohibiting natural gas piping in new buildings (See *Cal. Restaurant Association v. City of Berkeley* (9th Cir. 2024) 89 F.4th 1094.) Thus, the mitigation measure requirement (SA MM-15) to not install natural gas infrastructure at the Grapevine at Tejon Ranch project is "additional" to existing regulations. Tejon's Settlement Agreement requirement, made enforceable by the County by making the requirement mitigation, is the "but for" cause of the natural gas prohibition on residential construction in the Grapevine project. None of the residential units in the Grapevine project accounted for in the calculations for SA MM-15 have been constructed and due to SA MM-15 they will not be constructed with natural gas. The reduction credited for SA MM-15 is calculated in RPDEIR Appendix D, Table 11, which converts the natural gas use of the Grapevine project's single-family and low-rise apartment land uses (258,219 MMBtu per year) to equivalent electric use. Under the Settlement Agreement, Tejon Ranchcorp is obligated to enforce this ban on natural gas service to Grapevine residences (RPDEIR Appendix F, Settlement Agreement, at 5) and the County has enforcement authority over this requirement through the MMRP. Kern County certified the Supplemental EIR for the Grapevine project ("Grapevine SEIR") in 2019 and a superior court found no defects in the Grapevine SEIR. Kern County approved an SEIR addendum in October and Tejon is working on obtaining the natural resource permits required to construct the Grapevine project. No units at the Grapevine project area have been constructed and absent Tejon's commitment in the Settlement Agreement and through mitigation required by Los Angeles County for this Project, the units at Grapevine could have natural gas.

The commenter questions the GHG emission reductions associated with Mitigation Measures 10-25, 10-26, and 14-1. MM 10-25 requires the implementation of transit and transportation measures to ensure that a minimum of 30 percent of total daily internal on-site trips and a minimum of 20 percent of total off-site peak hour commutes to and from the Project site are

completed by using transit modes other than single-occupancy vehicles (SOVs). The Project's traffic consultant (Stantec) estimated the total trip reductions that would occur from limiting SOV use to 70 percent of internal trips and 80 percent of peak period external trips, in accordance with MM 10-25. Non-SOV internal trips were allocated to a range of alternative transportation modes, including high occupancy vehicles (HOVs), carpools, vanpools, and walking, biking and neighborhood electric vehicles. Non-SOV external trips were allocated to a range of HOVs, carpools, vanpools. The analysis determined that total Project passenger vehicle trips would be reduced by an average of 10 percent from the levels without mitigation by meeting the minimum internal and external SOV requirements in MM 10-25. Because 96 percent of all Project vehicle trips are anticipated to be passenger vehicle trips that are subject to the SOV use reduction, while the remaining 4 percent are comprised of heavier duty commercial and similar vehicles that are not subject to this reduction, the number of Project trips was reduced by 9.6 percent. CalEEMod includes input options for a project's implementation of pedestrian facilities and telecommuting rates, which are all calculated internally in CalEEMod using quantification criteria developed by the California Air Pollution Control Officers Association (CAPCOA). The GHG Calculations include CalEEMod inputs of the Project's Project-wide pedestrian/bicycle facilities (MMs 14-1 and 10-26), which is reflected in the reductions questioned by the commenter. (See 2019 Final EIR, Attachment: Updated GHG Report, at p. 5.)

The commenter notes that the GHG reductions associated with Mitigation Measures 10-25, 10-26, and 14-1 are equivalent of removing approximately 3,900 gas-powered vehicles per year. The Project is estimated to generate 146,154 trips per day. (Draft EIR, Appendix 5.10-A, at p. 3.5.) The trip reduction requirements in MM 10-25 alone reduce trips by 9.6 percent, which is approximately 14,030 trips per day. According to the 2010-2012 California Household Travel Survey, the per capita trip average is 3.6 trips per day, which means MM 10-25 reduces trips from approximately 3,900 drivers (14,030/3.6), consistent with the commenter's calculation. The reductions attributable to MM 10-26 and MM 14-1, including incorporation of sidewalks, greenway trails, and community trails to link land uses; small- to medium-sized streets and blocks allowing for shorter walking distances between land uses; pedestrian environments with public streets; transit route easements connecting residential and commerce areas; parking behind buildings to encourage walking; parks within 0.25 mile of 80 percent of residential units; complete streets to provide alternative modes of transport; Class I – IV bike lanes and bicycle racks; and locker rooms and shower facilities for non-residential buildings in Business Park and Commercial areas, further reduce trips and associated GHG emissions, which supports the reduction shown in the RPDEIR.

The 2019 Updated GHG Report attributes approximately 18.5 percent of the 83,897 MTCO2e per year in mobile-source reductions (approximately 15,521 MTCO2e per year) to MM 10-25 and approximately 3.0 percent (approximately 2,517 MTCO2e per year) to affordable housing, pedestrian facilities, and telecommuting, for a total of approximately 18,037 MTCO2e per year (2019 Final EIR, Updated GHG Report, pp. 5–6; RPDEIR pp. 2.2-50 and 2.2-51). This credit is based on the 9.6 percent trip reduction described above. The additional 2.4 percent VMT reduction cited on RPDEIR page 2.2-44 measures only part of

what is captured in the GHG calculations. That VMT number comes from the informational VMT disclosure in RPDEIR Appendix E, which applied CAPCOA reduction factors to three specific TDM programs (community-based travel planning through the TMA, carshare, and micromobility) after first accounting for a 28.7 percent reduction from PDFs, and compared the result to the Project's unadjusted travel demand model forecast (RPDEIR Appendix E, Section 3.3 and Table 3-4).

With respect to implementation, MM 10-25 and MM 10-26 require the Project Applicant/Developer to create and continuously operate a Transportation Management Association (TMA) to fund and manage ongoing transportation programs, including transit and on-demand services, and require the TMA to implement a combination of transit and transportation measures that ensures a minimum of 30 percent of total daily internal trips and 20 percent of off-site peak hour commutes are completed by modes other than SOVs (RPDEIR pp. 2.2-69 through 2.2-71). These mitigation measures are carried forward from the Centennial EIR, which was challenged on other issues. According to the proposed Specific Plan, Appendix 2-C, the TMA will regularly monitor Centennial external and internal trips by conducting transit mode surveys or other appropriate methodologies. The primary objective of the TMA is to ensure that peak external trips, and all internal trips, meet the non-SOV transit mode performance standards. The TMA will evaluate and implement TDM measures as necessary to achieve these standards. The County has authority to enforce Mitigation Measures 10-25 and 10-26, as well as compliance with the Specific Plan, including by reviewing the regularly conducted TMA monitoring reports to confirm that the Project is achieving its trip reduction requirements.

The commenter asks for more information about the EV chargers for trucks that the Project will, if approved, need to install at the Tejon Ranch Commerce Center. The associated GHG reductions that installing those chargers achieve was based on the fact that each truck charger will deliver approximately 165,000 kWh of electricity per year according to the SCAQMD Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program (Rule 2305), and that 100 chargers will be installed, as required by SA MM-9. The GHG reductions are derived directly from this 16.5 million kWh shifting away from diesel fuel. By displacing traditional diesel-fueled truck miles with zero-emission electric miles, the Project avoids substantial tailpipe greenhouse gas emissions. The annual GHG emission reductions are modeled by factoring in California's grid carbon intensity against the high-emissions baseline of traditional diesel-powered trucks. (RPDEIR, Appendix D, Table 4.)

The commenter asks how the planting of 322 trees could reduce Project emissions by 74 MTCO2e. The comment appears to combine two separate reductions disclosed in the RPDEIR. The 74 MTCO2e reduction is from a different measure (MM 21-20) which requires all electric landscape maintenance equipment. The estimated reductions from MM 7-11, MM 7-12, and the portion of MM 21-20 that requires compliance with the County's Tree Planting Ordinance combined is conservatively estimated to be 108 $MTCO_2e$. MM 7-11 requires the Project to establish 6.2 acres of mixed oak woodlands, including 322 oak trees, and preserve 6.2 acres of mixed oak woodlands. In oak woodlands, the dominant trees are oaks, but those oaks are interspersed with other broadleaf and coniferous trees, with an understory of grasses, herbs, geophytes, and California native plants. MM 7-12 includes,

among other requirements, creation of approximately 78.4 acres of wetland/riparian habitat. MM 21-20 results in the planting of approximately 35,123 trees. The CalEEMod Users guide provides estimates of carbon sequestration from the planting of trees and other vegetation, and this default was used to calculate that the Project's mitigation measures requiring planting of vegetation would reduce emissions by 108 $MTCO_2e$ per year. The 2019 Updated GHG Report (Table 1, note h) attributes this 108 MTCO2e per year reduction to MM 7-11, MM 7-12, and MM 21-20 "and regulatory factors." The 322 oak trees required by MM 7-11 are a small subset of the approximately 35,123 trees expected to be planted. To derive the Project's unmitigated emissions, all reductions labeled as mitigation measures or regulations in the 2019 Updated GHG Report were removed from the inventory; the 108 MTCO2e per year reduction corresponds to the mitigation measure reductions footnoted in that report and is quantified separately in the net zero analysis. This is a conservative estimate. According to the 2019 Final EIR, the planting of an estimated 35,123 new trees, as required by the County Tree Planting Ordinance would result in an estimated long-term sequestration of 24,867 $MTCO_2e$, amortized over 100 years. (RPDEIR Table 2.2-3.) This was disclosed as a conservative analysis, as it is likely that many more trees would be planted than the minimum required by the County ordinance. (2019 Final EIR, at pp. 2-397, 2-1077.)

Response B.4-32

The commenter questions the effectiveness of the mitigation measures requiring the installation of offsite EV chargers, claiming that the "current EV charging network is beset by frequent outages and maintenance challenges."

The California Energy Commission found that by 2035, the state will need 2.11 million chargers (including 83,000 direct-current fast chargers) to support 15.2 million light-duty plug-in electric vehicles (CEC, Assembly Bill 2127 Second Electric Vehicle Charging Infrastructure Assessment, CEC-600-2024-003, 2024). To support medium- and heavy-duty plug-in electric vehicles, California will need about 264,000 chargers (256,000 depot chargers and 8,500 en route chargers) for 377,000 vehicles in 2035. The Project's commitment to providing offsite EV chargers provides a meaningful way to help California meet its unmet EV charger needs. By doing so, the Project also will encourage EV ownership by providing easy access to new chargers.

But, as the commenter notes, California's aging public EV infrastructure has led to reliability issues with those public older EV chargers. The Project would install new, mainly private EV chargers. Recent industry data show the newest equipment achieving the lowest daily rates.[28]

Regarding public EV charges, in 2025, to address reliability issues with public chargers, the California Energy Commission (CEC) adopted EV Charging Data and Reliability Standards to improve the reliability, transparency, and accessibility of California's electric vehicle (EV)

[28] J.D. Power, *2026 U.S. Electric Vehicle Experience (EVX) Public Charging Study*, August 12, 2026, available at https://www.jdpower.com/business/press-releases/2026-u-s-electric-vehicle-experience-evx-public-charging-study/, accessed September 2026.

charging infrastructure.[29] These standards include an inventory reporting requirement and a 97 percent uptime standard; however, the uptime standard applies only to publicly funded direct current fast chargers (DCFCs) installed on or after January 1, 2024, that do not exclusively serve fleets.[30]

Regarding private chargers, such as those required to be installed at the Tejon Ranch Commerce Center, such chargers are not part of the reliability studies the commenter likely has read.

The continued operability of the private chargers credited in the RPDEIR is ensured through the fact that the County can enforce the mitigation measures requiring these EV chargers. Additionally, the mitigation measures requiring EV chargers, state that they must be "operable". (See RPDEIR, at 2.2-5 – 2.2-6.) In response to this comment, to clarify that EV chargers must be kept operable, the County has added such requirements to SA MM-9 and SA MM-14 and added SA MM-10 as shown in Section 3.0, *Corrections, Clarifications, and Additions to the RPDEIR, and Draft EIR, 2019 Final EIR, and Consolidated 2019 Final EIR as Relevant to the RPDEIR,* of this Final Recirculated EIR. The County also notes that where EV chargers are required by the Settlement Agreement, such as SA MM-9 and SA MM-14, Climate Resolve also can enforce charger operability.

Response B.4-33

The comment provides concluding remarks, reiterates the organizations' request for a fully revised and recirculated EIR addressing biological resources, wildfire risk, and greenhouse gas emissions, and asks to be included on future project notice lists.

The County acknowledges the organizations' participation in the public review process and their request for continued notification regarding future project updates. The County will comply with all applicable CEQA procedural and noticing requirements. The comment does not raise a specific environmental issue regarding the content or adequacy of the RPDEIR, and no revisions to the RPDEIR are required. The comments will be included in the administrative record and provided to County decisionmakers for their consideration.

[29] California Energy Commission, EV Charger Data and Reliability Standards: Data Submission Guidance, available at https://www.energy.ca.gov/programs-and-topics/programs/clean-transportation-program/zev-infrastructure-data-reporting/ev, accessed September 2026.

[30] *Id.*

Response to Comment Letter B.5

Adams Broadwell Joseph & Cardozo Attorneys at Law on behalf of Coalition for Responsible Equitable Economic Development Los Angeles (CREED LA)
Aidan P. Marshall
August 13, 2026

Response B.5-1

The comment is an introductory summary of the project background, the 2025 Second District Court of Appeal decision in *Center for Biological Diversity et al. v. County of Los Angeles et al.* (2025) 112 Cal.App.5th 317, and the procedural history of the Centennial Specific Plan. Because this comment provides background information and frames the legal context of the litigation rather than raising a specific environmental issue or inadequacy regarding the RPDEIR, no further response is required pursuant to CEQA Guidelines Section 15088.

The County notes the commenter's accurate recitation of the court's holdings requiring recirculation regarding greenhouse gas emissions analysis and wildfire risks associated with off-site infrastructure, as well as the inclusion of microgrid electrical distribution systems and the Cement Road Realignment. Responses to the specific, substantive environmental comments raised in the subsequent sections of this letter are provided in the corresponding topical responses below.

Response B.5-2

The comment provides introductory legal arguments and conclusions asserting that the introduction of microgrid electrical distribution systems, updated fuel modification requirements, and the use of biological surveys conducted between 1999 and 2015 constitute significant new information requiring further recirculation under CEQA Guidelines Section 15088.5. This comment also incorporates general claims that the RPDEIR lacks substantial evidence, fails to proceed in the manner required by law, and fails as an informational document. Because this comment serves as an overarching summary of legal contentions rather than identifying a specific technical defect, no further general response is required at this introductory stage.

The County notes the commenter's legal standards regarding recirculation and the necessity of addressing project changes and environmental baseline conditions. Specific, substantive responses to the individual issues raised in this comment—including the level of detail provided for the microgrid electrical distribution systems, the evaluation of fuel modification impacts, and the validity and adequacy of the biological surveys and environmental setting—are provided in Response B.4-3.

Response B.5-3

The comment provides a statement of interest on behalf of CREED LA, describing its organizational mission, the composition of its membership, and its general support for sustainable development, worker health and safety, and rigorous environmental review under CEQA. Because this statement outlines organizational background and broad policy positions rather than raising a specific technical or environmental issue regarding the RPDEIR, no further response is required pursuant to CEQA Guidelines Section 15088.

The County acknowledges the commenter's organizational interest in environmental protection, public health, and worker safety. The specific technical and environmental issues raised in subsequent sections of the comment letter are addressed in the corresponding topical responses below.

Response B.5-4

This comment states the RPDEIR fails to adequately describe new microgrid uses, which may result in new or substantially more severe environmental impacts. The comment states that microgrid systems employ various energy uses, which if not properly installed, maintained or monitored, can create significant risk of upset, including fires and public safety hazards. The comment states that failure to establish limitations on the size of these systems fails to meet CEQA's standards for an adequate project description.

As described in the RPDEIR, the Specific Plan would allow microgrids as a potential future utility option; however, the approval of the Specific Plan does not authorize the construction or installation of any specific microgrid. Any future microgrid proposal would require separate review and approval by the County and other applicable regulatory agencies. Such review would include site-specific evaluation of the proposed facility's design, location, fire protection features, and potential environmental effects. It would be speculative to provide such details at this early stage of project development.

As described on page 1-5 of the RPDEIR, the addition of local microgrid electrical distribution systems as a permitted land use would revise Specific Plan Table 2-16 to add "Renewable Energy Microgrids" as a new land use type within the "Accessory Uses and Structures" category of use types, and would designate the use as "P" (i.e., Permitted) within the Specific Plan's Very Low Density Residential (VLDR), Low Density Residential (LDR), Medium Density Residential (MDR), High Density Residential (HDR), Very High Density Residential (VHDR), Mixed Use (MU), Commercial (C), Business Park (BP), School, Recreation/Entertainment (RE), Utility (U), and Institutional/Civic (I/C) land use designations, and would designate the use as "M" (i.*e.*, Permitted with Ministerial Review) within the Specific Plan's Park land use designation.

The addition of local microgrid electrical distribution systems as a permitted use is not expected to result in additional disturbance area, vehicle trips, noise, hazards risk, view impacts, or air emissions not otherwise accounted for in the Centennial EIR. Local microgrid electrical distribution systems would not develop additional residences or other land uses

that would use public services or utilities, and therefore would not impact Parks and Recreation, Education, Fire and Law Enforcement Services, and Other Public Services. Because no new disturbance areas would be introduced by the addition of local microgrid electrical distribution systems as a permitted use, there would be no new or increased Geotechnical or Hydrology and Flood impacts or impacts to Cultural and Tribal Cultural Resources and Biological Resources. Local microgrid electrical distribution systems would have minimal water demand and therefore impacts to Water Resources would not increase substantially beyond that already evaluated in the Centennial EIR (RPDEIR, pp. 1-4 through 1-6). A local microgrid electrical distribution system would not require substantial employees for maintenance and therefore would not increase public service impacts or vehicle trips. Finally, hazards risks would be similar to other uses permitted in the Specific Plan and therefore impacts to Hazards and Fire Safety would be similar to those evaluated in the Centennial EIR (RPDEIR pp. 1-4 through 1-6). For example, Specific Plan Table 2-16 already lists as allowable accessory uses: air quality sampling stations, electric generation including but not limited to fuel cells, photovoltaics, and microturbines scales to the uses for which they are sited, electrical substations, transmission substation facilities, gas metering, control stations, and photovoltaic panels for electrical production as an accessory use.

Importantly, the Project does not propose a microgrid project. As described in the RPDEIR, individual microgrid projects may or may not be proposed and developed within the Specific Plan. (RPDEIR, p. 1-5.) Because the Project does not propose construction of any particular microgrid facility, the precise design, technology, capacity, and location of any future installation are presently unknown and evaluation of impacts of such a potential future facility would be speculative. If proposed, a microgrid facility would be subject to general development requirements of the Specific Plan, including lot sizes, street frontage, building height limits, and setbacks. (See Specific Plan, Section 2.3.) In addition, detailed fire protection planning and technical review by the Los Angeles County Fire Department would be required. Such review may include evaluation of technology, thermal runaway prevention measures, fire suppression systems, emergency access, separation distances, monitoring systems, ventilation requirements, emergency response procedures, and other design features intended to reduce fire and explosion risks.

Response B.5-5

This comment states that California courts require an accurate, stable and finite project description and that, without a complete project description, the environmental analysis under CEQA is impermissibly limited, thus minimizing the Project's impacts and undermining meaningful public review.

Please refer to Response B.5-4.

Response B.5-6

This comment states that failure to describe the types of facilities authorized by the new permitted land use category precludes accurate assessment of the Project's public health, safety, and hazards associated with implementation of the Project's renewable energy

mitigation. The comment states that microgrids can include battery energy storage systems (BESS), which malfunction can result in the release of toxic materials and/or release of a flammable gas mixture and subsequent flammable gas vapor cloud with subsequent fire or explosion. The comment states that lack of information about the proposed microgrids' design, components, installation, and operation is necessary to accurately assess its impacts.

Please refer to Response B.5-4.

Response B.5-7

This comment states that some microgrids include diesel generators, which can emit criteria air pollutants, GHGs, and toxic air contaminants and can significantly impact public health through diesel particulate matter emissions. The comment claims that adding microgrids as a permitted use may result in greater GHG and other air quality impacts than previously analyzed.

Please refer to Response B.5-4.

Response B.5-8

This comment states that without basic information regarding the proposed design and scale of microgrids permitted under the Specific Plan, the severity of these systems' risks cannot be assessed. The comment states that the RPDEIR must be revised to clearly describe what microgrid uses would be authorized by the Specific Plan and to analyze their new impacts.

Please refer to Response B.5-4.

Response B.5-9

The comment states that the RPDEIR fails to analyze new hazards and wildfire risks from microgrids. The comment states that microgrid electrical distribution systems containing BESS can malfunction and result in fires and explosions. The comment states that introducing numerous new microgrids to the Specific Plan area without adequate analysis and mitigation may place hazards in the direct path of the Project's new communities and would impact local fire services in the event of an emergency.

Please refer to Response B.5-4.

Response B.5-10

The comment states that hazard risks of microgrids are not discussed in the RPDEIR. The comment states that the fire services analysis has not been revised to address whether microgrids as a new land use would significantly increase demand for fire services and the wildfire analysis has not been revised to address whether the new land use would increase wildfire risks.

Please refer to Response B.5-4.

Response B.5-11

This comment states that the RPDEIR identifies new wildfire mitigation measures and regulatory requirements, including Zone 0 requirements. The comment states that Zone 0 requirements may have adverse direct and indirect impacts on local wildlife and their habitat. The comment states that the RPDEIR should be revised and recirculated to address the impacts of new wildfire mitigation on biological resources.

Please refer to Responses B.4-7 and B.4-22. The comment incorrectly assumes that the five-foot Ember-Resistant Zone constitutes a new area of biological disturbance extending across thousands of acres. Zone 0 would apply only within five feet of structures and would not create continuous hardscape throughout the Project's developed area. More importantly, the structures and immediately surrounding developed lots where Zone 0 would be implemented are located within the Project's previously analyzed development footprint. The requirement affects the landscaping and materials permitted immediately adjacent to future structures; it does not expand the development footprint, increase the amount of native habitat authorized for removal, or authorize vegetation clearing within the Project's Preserve System.

The Centennial EIR already accounted for the biological effects of vegetation removal and fuel modification within the Project's 7,751-acre development footprint. As explained in the Centennial EIR, the Project's fuel-modification zones are included within the development footprint and impact boundary depicted on Exhibits 5.7-11a and 5.7-11b. No Project-related fuel-modification activities, including vegetation clearing, may occur outside that boundary. The Centennial EIR therefore did not assume that native vegetation or wildlife habitat would remain within areas designated for development and later subject to fuel modification (Consolidated 2019 Final EIR, Response to Comment F.8-64).

The Centennial EIR also includes measures preventing fuel-modification activities from extending into protected biological areas. MM 7-22 requires fuel-modification zones to remain within the Project impact boundary and prohibits their intrusion into the adjacent Significant Ecological Area. MM 7-21 further prohibits fuel-modification zones from encroaching into the adjacent Significant Ecological Area, and MM 7-1 restricts fuel modification in areas occupied by identified special-status plants. (Centennial EIR, Section 5.7.) Accordingly, implementation of MM WILD-2 in accordance with current fire-safety requirements does not authorize additional disturbance within preserve lands or other areas outside the biological impact boundary analyzed in the Centennial EIR.

For the same reason, Zone 0 would not result in a new or substantially more severe effect on wildlife movement. The Centennial EIR's wildlife-movement analysis considered the conversion of the entire development footprint, rather than assuming that landscaping immediately adjacent to future structures would function as undisturbed movement habitat. The Project's movement functions are retained principally through its approximately 43,079-acre Preserve System, including preserve lands along the Project's northern,

western, and southern boundaries and connections to adjoining undeveloped lands. Requiring noncombustible or ember-resistant treatment within five feet of structures inside the development footprint does not reduce those preserve areas, sever an additional movement pathway, or alter the EIR's conclusions concerning regional wildlife connectivity.

MM WILD-2 updates the Project's Fuel Modification Plan requirement to reflect current fire-safety regulations. It does not enlarge the area subject to development or fuel modification. The change in the treatment of the area immediately adjacent to structures therefore does not cause additional habitat loss beyond the disturbance already analyzed or result in a new or substantially more severe biological impact.

Accordingly, the expected Zone 0 requirements do not require additional biological analysis, mitigation, or recirculation of the RPDEIR. The comment will be included in the administrative record and provided to County decisionmakers for their consideration.

Response B.5-12

The comment provides a concluding summary of the commenter's legal arguments and asserts that the RPDEIR remains legally inadequate under CEQA, requesting that the document be revised and recirculated prior to any project re-approval. Because this comment synthesizes the overarching legal conclusions and demands presented throughout the letter rather than raising a new specific technical or environmental issue, no further response is required pursuant to CEQA Guidelines Section 15088.

The County notes the commenter's concluding summary and requests for recirculation. As detailed in the preceding specific responses addressing the individual comments within this letter, the RPDEIR satisfies all requirements of CEQA and the CEQA Guidelines and is supported by substantial evidence.

Response to Comment Letter C.1

Myong Hwa Lim
June 5, 2026

Response C.1-1

This comment states that the commenter, owner of parcel APN 3275-008-003, is requesting clarification on their parcel's designated land use and zoning under the RPDEIR, whether it is subject to any land acquisition or easement by the developer, and how to view the project map overlay showing their lot.

The commenter's parcel is not located within the Centennial Specific Plan area, and therefore, the Project proposes no changes to the parcel's zoning or land use designation. The parcel is not subject to any land acquisition or easement by the developer. The County acknowledges this comment, and the comment is included in the administrative record. The comment does not address the content or adequacy of the RPDEIR under CEQA or the State CEQA Guidelines; no additional response is required.

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3.0 CORRECTIONS, CLARIFICATIONS, AND ADDITIONS TO THE RPDEIR, DRAFT EIR, 2019 FINAL EIR, AND CONSOLIDATED 2019 FINAL EIR AS RELEVANT TO THE RPDEIR

Any corrections, clarifications and additions to the RPDEIR text, tables, and figures generated either from responses to comments or independently by the County, are stated in this section. Various administrative corrections regarding figure/table numbers and names, grammatical, punctuation, spelling and typographical errors in the RPDEIR are not called out separately in this document; however, any substantive changes are individually addressed.

These RPDEIR corrections, clarifications, and additions are provided to clarify and amplify the RPDEIR. Some changes are corrections or clarifications regarding the text and tables of the RPDEIR. Other changes clarify the RPDEIR analysis based on the information and concerns raised by comments during the public review period. None of the information contained in these RPDEIR revisions constitutes "significant new information" as that term is defined in CEQA Guidelines Section 15088.5. Information added to the Final Recirculated EIR through revisions only clarify or amplify information already provided or make insignificant modifications to the already adequate RPDEIR. Therefore, these changes do not require recirculation of the RPDEIR.

The revisions contained in the following pages are in the same order as the information appears in the RPDEIR. Changes in text are signified by strikeouts (~~strikeouts~~) where text has been removed and by underlining (<u>underline</u>) where text has been added. The applicable page numbers from the RPDEIR are also provided where necessary for ease of reference.

3.1 REVISIONS TO THE RPDEIR

SECTION 1.0, INTRODUCTION

RPDEIR, Pages 1-3 and 1-4, Section 1.2, Purpose

<u>Note: The RPDEIR states that responses to comments would be provided in a separate document, the "Revised Final EIR." The responses to comments on the RPDEIR are provided in this document, which is titled the Final Recirculated EIR. As explained in Section 1.1 of this document, together with the Draft EIR, 2019 Final EIR, Consolidated 2019 Final EIR, and RPDEIR, comprises the Revised Final EIR for the Project. The text below is revised for consistency with that naming convention.</u>

… Responses to all comments received during the review period regarding the environmental analysis in this Recirculated Partial Draft EIR will be provided in a separate document – ~~a Revised Final EIR~~ <u>the Final Recirculated EIR, which, together with the Draft</u>

EIR, 2019 Final EIR, Consolidated 2019 Final EIR, and this Recirculated Partial Draft EIR, comprises the Revised Final EIR. …

RPDEIR, Pages 1-19 and 1-20, Section 1.0, Introduction (Cumulative Impacts (EIR Section 7.0))

… the Project's increase in demand for dry utilities (including electricity, natural gas, petroleum, telephone, and cable television) would not be cumulatively considerable; and the Project's impact related to GHG emissions is cumulatively considerable and the cumulative impact would be significant. As discussed in Section 3.0, *Cumulative Impacts*, of this RPDEIR, with implementation of the SA MMs and the Project's mitigation measures, the Project would achieve net zero GHG emissions and would not make a cumulatively considerable contribution to significant cumulative impacts from GHG emissions.

RPDEIR, Page 1-21, Section 1.0, Introduction (Alternatives (EIR Section 8.0))

The Court of Appeal's Opinion upheld the Centennial EIR's discussion of alternatives. The Centennial EIR has not been revised to include significant new information concerning alternatives. However, because the Project's climate change impact is now less than cumulatively considerable with mitigation, the climate change discussion in Section 8.0 of the Centennial EIR has been updated to reflect that climate change is no longer a significant and unavoidable impact of the Project. Alternatives B, C, D, and E, which would be developed on the Project site, would have similar climate change impacts to the Project. Alternative F would result in a new significant and unavoidable climate change impact that would not occur under the Project. These updates do not change the Centennial EIR's conclusion that Alternative E is the environmentally superior alternative.

SECTION 2.1, BIOLOGICAL RESOURCES

RPDEIR, Page 2.1-4, Section 2.1, Biological Resources (Threshold 2.1-1)

Note: The Mitigation Preserve acreages on RPDEIR page 2.1-4 were carried forward from the Draft EIR and do not reflect the revisions made in the 2019 Final EIR. Those revisions added Off-Site Preserve Area 7 and revised the Mitigation Preserve to approximately 43,079 acres: approximately 3,866 acres on site and 39,213 acres off site (Consolidated 2019 Final EIR, Section 4.0, Clarifications and Revisions to the EIR, pp. 4-164 through 4-166 and 4-194 [MM 7-10, Table A]). The text below is revised to reflect the acreages in the Centennial EIR. This correction increases the size of the preserve described in the RPDEIR and does not result in any new or substantially more severe environmental impact.

… As described in Section 5.7 of the Centennial EIR, the Project's Mitigation Preserve Program (Project Design Feature 7-1) includes a ~~27,408~~43,079-acre preserve system consisting of approximately ~~3,861~~3,866 acres of unimpacted/Significant Ecological Area lands on-site and ~~23,547~~39,213 acres in additional off-site areas, including lands on Tejon Ranch. …

SECTION 2.2, CLIMATE CHANGE

RPDEIR, pages 2.2-47 and 2.2-48, Section 2.2, Climate Change (Threshold 2.2-1)

… Third, the large scale of the Project also enhances its ability to achieve net zero emissions through project-wide requirements and prohibitions, investments in EV infrastructure, and off-site GHG ~~offsets~~ reduction measures. For these reasons, the County elects to use net zero compared to baseline as the appropriate standard of significance for the Centennial Project.

… SA MM-6 and MM-7 together require 19,333 chargers for residential units (i.e., enough for one charger per planned dwelling unit). SA MM-6 and MM-7 together will reduce emissions by ~~51,462~~26,557 $MTCO_2e$ per year.

SA MM-8 requires the installation of 3,500 electric vehicle chargers in the on-site commercial areas. SA MM-8 will reduce emissions by ~~72,428~~37,377 $MTCO_2e$ per year. SA MM-10 requires enforceable CC&Rs requiring the Project's Non-Residential owners to maintain and keep operable the EV chargers located on their respective properties. As explained in footnote 2 to Table 2.2-10, the reductions credited for the on-site mobile-source measures (SA MM-6, SA MM-7, SA MM-8, and SA MM-13) have been conservatively scaled down so that, combined, they do not exceed the 65,859 $MTCO_2e$ per year reduction associated with the 50 percent EV utilization rate at Project buildout assumed in the 2019 EIR (26,557 + 37,377 + 1,925 = 65,859 $MTCO_2e$ per year). The unscaled estimates are presented in Tables 3, 5, and 6 of Appendix D.

… SA MM-12 and SA MM-13 require the subsidized procurement of 100 community electric vehicles, 300 public-service electric vehicles, and incentives to support electric school and transit buses and install electric vehicle charging stations to serve them. These substitutions of electric vehicles will lower GHG emissions on- and off-site by ~~4,767.9 (259.5 + 778.4 + 3,730)~~2,962 (259 + 778 + 1,925) $MTCO_2e$ per year.

… SA MM-15 prohibits the installation of natural gas infrastructure serving residential buildings and fossil fuel fireplaces at the Grapevine Specific plan Project site. The elimination of natural gas at the Grapevine Specific Plan Project Site would ~~offset~~ **reduce** emissions by 11,225 $MTCO_2e$ per year.

RPDEIR, Page 2.2-51, Section 2.2, Climate Change (Threshold 2.2-1)

The above-listed PDFs (21-3, 21-8, 21-9, 21-10, 21-20, 21-21) and MMs (7-11, 7-12, 10-25, 10-26, 13-2, 13-6, 14-1, 21-20, 21-22) result in reductions totaling 23,598 $MTCO_2e$, resulting in the Project ~~having net negative GHG emissions. In other words, the Project would reduce more GHG emissions than it would emit~~ achieving net zero GHG emissions with a margin of approximately 9,814 $MTCO_2e$/yr (about 4 percent of the Project's unmitigated emissions of 247,101 $MTCO_2e$/yr). This result relies on both on-site and off-site reductions: after the on-site SA MMs, approximately 112,136 $MTCO_2e$/yr would remain, which is then reduced by the off-site SA MMs (98,352 $MTCO_2e$/yr) and the PDFs and MMs (23,598 $MTCO_2e$/yr), for net emissions of approximately –9,814 $MTCO_2e$/yr. All the PDFs identified in the 2019 EIR,

rather than just those quantified for this net zero analysis, are carried forward as part of the Project and would continue to reduce the Project's GHG emissions.

In summary, with the PDFs and MMs set forth above and SA MMs-1–3, SA MMs-6–9, and SA MMs-11–16, the Project would ~~reduce more GHG emissions than it would generate~~ achieve net zero GHG emissions with a margin of approximately 9,814 $MTCO_2e/yr$.

RPDEIR, Page 2.2-52, Section 2.2, Climate Change (Threshold 2.2-2)

As demonstrated under GHG Threshold 1, the Project would achieve net-zero GHG emissions with a margin of approximately 9,814 $MTCO_2e/yr$ through reductions attributable to PDFs (21-3, 21-8, 21-9, 21-10, ~~21-10,~~ 21-20, 21-21), MMs (7-11, 7-12, 10-25, 10-26, 13-2, 13-6, 14-1, 21-20, 21-22), and the SA Mitigation Measures (SA MMs 1–3, SA MMs 6–9, and SA MMs 11–16). Accordingly, the Project is consistent with AQ Policy 3.1 of the 2035 General Plan and the 2045 CAP and would not conflict with either the General Plan or the 2045 CAP.

RPDEIR, Page 2.2-54, Section 2.2, Climate Change (Table 2.2-11, Project Consistency with Draft 2022 Scoping Plan Climate Change Key Residential and Mixed-Use Project Attributes that Reduce GHGs, "Does not result in the loss or conversion of natural and working lands" row)

… In addition, the Mitigation Preserve Program (Project Design Feature 7-1) includes a ~~27,408~~43,079-acre preserve system consisting of approximately ~~3,861~~3,866 acres of unimpacted/Significant Ecological Area lands on-site and ~~23,547~~39,213 acres in additional off-site areas.

RPDEIR, Page 2.2-59, Section 2.2, Climate Change (Cumulative Impact Significance Determination)

Therefore, as explained above, with implementation of the PDFs (21-3, 21-8, 21-9, ~~21-10,~~ 21-10, 21-20, 21-21), MMs (7-11, 7-12, 10-25, 10-26, 13-2, 13-6, 14-1, 21-20, 21-22), and SA Mitigation Measures (SA MMs 1–3, SA MMs 6~~–9, and SA MMs 11–~~16), the Project would not make a cumulatively considerable contribution to significant cumulative impacts from GHG emission.

RPDEIR, Pages 2.2-80 and 2.2-81, Section 2.2.9, Climate Change (Mitigation Measures)

SA MM-9 Install and maintain 100 operable EV chargers to serve Medium-Duty and Heavy-Duty vehicles at the Tejon Ranch Commerce Center. The first of these EV chargers must be installed and made operable prior to receipt of a certificate of occupancy for the 100,972nd square feet of non-residential uses within the Centennial Specific Plan area, and one additional EV charger must be installed and made operable at the Tejon Ranch Commerce Center prior to issuance of a certificate of occupancy for each subsequent 100,972 square feet of nonresidential uses within the Centennial Specific Plan thereafter. Such chargers shall be maintained for the

life of the Centennial project, with any failed units replaced within 30 days of failure.

SA MM-14 Install 5,000 operable Level 2 or higher-capacity EV chargers in disadvantaged communities located within the jurisdictional boundary of the South Coast Air Management District, with the first EV charger installed prior to issuance of a certificate of occupancy for the 4th dwelling unit within the Centennial Specific Plan area, with one additional EV charger installed for every 4th dwelling unit thereafter. The Project sponsor shall provide EV charger recipients information for EV charger maintenance and contact information for repairs. During the life of the Centennial project, any request for repair shall be addressed within thirty days.

SECTION 2.3, WILDFIRE

RPDEIR, Page 2.3-57, Section 2.3, Wildfire (Threshold 2.3-1, Fuel Modification Zone Distance Requirements)

Note: The minimum width of Zone A under current Los Angeles County Fire Department fuel modification standards is 30 feet. The Zone A and Zone B distance requirements on RPDEIR page 2.3-57 have been revised to reflect the 30-foot Zone A; the overall fuel modification widths (100, 150, or 200 feet) do not change. This revision conforms page 2.3-57 to the Centennial Wildfire Safety Plan (RPDEIR Appendix G), which already describes a 30-foot-wide Zone A (pages 40 and 139). Consistent with MM WILD-2, the Project's Fuel Modification Plan must demonstrate compliance with the then-current LA County Fire Code Title 32 fuel modification standards. As discussed in Response B.4-7, this change affects only the treatment of the area immediately adjacent to structures within the fuel modification area evaluated in the Centennial EIR. It does not enlarge the area subject to development or fuel modification and does not result in any new or substantially more severe environmental impact.

… The distance requirements for each zone are described below:

- 200-foot Setback
  - Zone A extends ~~20~~ 30 feet from the edge of any combustible structure, accessory structure, appendage or projection.
  - Zone B extends from the outermost edge of Zone A to 100 feet from structure (or ~~80~~ 70 feet from the outermost edge of Zone A).
- 150-foot Setback
  - Zone A extends ~~20~~ 30 feet from the edge of any combustible structure, accessory structure appendage, or projection.
  - Zone B extends from the outermost edge of Zone A to 50 feet from the structure (or ~~30~~ 20 feet from the outermost edge of Zone A).

- 100-foot Setback
    - Zone A extends ~~20~~ 30 feet from the edge of any combustible structure, accessory structure, appendage, or projection.
    - Zone B extends from the outermost edge of Zone A to 50 feet from the structure (or ~~30~~ 20 feet from the outermost edge of Zone A). …

RPDEIR, Pages 2.3-155 and 2.3-156, Section 2.3, Wildfire (Mitigation Measures)

Note: MM 11-3 has been revised to conform to SA MM-3 (RPDEIR p. 2.2-48), which prohibits all fireplaces that use fossil fuels at the Project. As revised, MM 11-3 no longer allows up to 13,954 natural gas fireplaces. The same revision applies wherever MM 11-3 is reproduced in the RPDEIR appendices, including Appendix G, Centennial Wildfire Safety Plan (Section 7.3.6, page 149, and Appendix D, page E-11); Appendix J, Centennial Off-Site Ignition Risk Assessment (Appendix D, page DE-11); and Appendix K, Centennial Risk Reduction Measures (page E-11). The revision makes MM 11-3 more protective and consistent with the fireplace reductions already credited to SA MM-3 in Table 2.2-10 of the RPDEIR. It does not result in any new or substantially more severe environmental impact.

MM 11-3 **Ban on Wood Burning and Fossil Fuel Fireplaces (Existing Centennial EIR MM 11-3, as revised).** The Project's plans and specifications shall prohibit wood-burning fireplaces as required by SCAQMD Rule 445 in single-family residences throughout the entire Project site, including residences that are 3,000 or more feet ~~about~~ above mean sea level at which the SCAQMD prohibition would otherwise not apply. ~~Natural gas fireplaces shall be limited to a total of 13,954.~~ Consistent with SA MM-3, fireplaces that use fossil fuels, including natural gas fireplaces, shall also be prohibited throughout the Project site. These requirements shall be posted on the community intranet and shall be clearly described and distributed to home buyers through their home purchase contracts and CC&Rs.

RPDEIR, Pages 2.3-157 and 2.3-158, Section 2.3, Wildfire (Mitigation Measures)

MM WILD-1 **Construction Fire Prevention Plan.** Prior to the issuance of grading or building permits, the project proponent/operator shall implement all protocols for reducing the potential of ignitions during construction set forth in the Project's proposed Construction Fire Prevention Plan (Appendix I to the RPDEIR). The project proponent/operator shall submit the plan, along with maps of the project site and access roads, to the Los Angeles County Fire Department for review and approval. A copy of the approved Construction Fire Prevention Plan shall be submitted to the Department of Regional Planning. The Construction Fire Prevention Plan shall provide standard protocols and approaches for reducing the potential of ignitions for typical construction site activities, including, but not limited to, the following:

a. Emergency notification and evacuation procedures.

b. Designation of a Site Safety Officer ~~whole~~who shall understand the CFPP and its mandates for fire prevention, fire suppression, and evacuation and shall have authority to stop project work activities that pose a fire hazard or are not in compliance with the approved CFPP.

c. Vehicles shall be equipped with specified fire prevention equipment.

d. All internal combustion engines, both stationary and mobile, shall be equipped with spark arresters.

e. Equipment parking areas and small stationary engine sites shall be cleared of all extraneous flammable materials.

f. Red Flag Warning Weather and Hot Work restrictions.

~~d.~~**g.** Fire rules shall be posted on the project bulletin board at the contractor's field office and areas visible to employees.

~~e.~~**h.** Procedures shall be established for minimizing potential ignition, including, but not limited to, vegetation clearing and management, parking requirements/restrictions, idling restrictions, smoking restrictions, and proper use of gas-powered equipment.

~~e.~~**i.** Personnel shall be trained in the practices of the CFPP relevant to their duties. Construction and maintenance personnel shall be trained and equipped to extinguish small fires to prevent them from growing into more serious threats.

~~f.~~**j.** The project proponent/operator shall restrict the use of chainsaws, chippers, vegetation masticators, grinders, drill rigs, tractors, torches, and explosives to days when the Los Angeles County Fire Department Daily Fire Danger Rating is low. When the above tools are used, water tanks equipped with hoses, fire rakes, and axes shall be easily accessible to personnel.

RPDEIR, Page 2.3-159, Section 2.3, Wildfire (Mitigation Measures)

MM WILD-5 Operational Emergency Response Enforcement (New Mitigation Measure). The Project Applicant/Developer shall submit the Emergency Response Plan required by MM 3-7 to the Fire Department and/or County Sheriff's Department and California Department of Forestry and Fire Protection for review and approval. The Emergency Response Plan shall demonstrate compliance with California WUI access standards (Chapter 4 Section 403) and County Fire Code requirements, utilize existing information from Los Angeles County Office of Emergency Management, coordinate with County emergency planners, and provide site specific procedures for various emergency situations including wildfire. The Property CC&Rs shall require future residential and commercial property owners associations to develop and implement an emergency preparation and response plan, including

shelter-in-place and evacuation plans as well as first aid and emergency electric power supplies.

SECTION 3.0, CUMULATIVE IMPACTS

RPDEIR, Page 3-2, Section 3.0, Cumulative Impacts (Threshold 2.1-1 Biological Resources)

As discussed in Section 2.1 of this Recirculated Partial Draft EIR, the Project site includes suitable habitat for Crotch's bumble bee, and the species is presumed to be on-site. The Project's Mitigation Preserve Program (Project Design Feature 7-1) includes a ~~27,408~~43,079-acre preserve system consisting of approximately ~~3,861~~3,866 acres of unimpacted/Significant Ecological Area lands on-site and ~~23,547~~39,213 acres in additional off-site areas, including lands on Tejon Ranch. Through the Mitigation Preservation Program, the Project would provide a greater than 2:1 preservation-to-impact ratio for conservatively estimated potentially suitable Crotch's bumble bee habitat. The Recirculated Partial Draft EIR includes Mitigation Measure ~~7-23~~BIO-1 to address potential direct impacts to Crotch's bumble bee during ground disturbance, which requires preconstruction surveys, nest buffers, grubbing restrictions, construction vehicle speed limits, and consultation with CDFW if known nests cannot be avoided. Other applicable mitigation measures for sensitive plants and wildlife species would also reduce adverse effects to Crotch's bumble bee habitat (MM 7-3, MM 7-4, MM 7-10, MM 7-11, MM 7-12, MM 7-13, MM 7-15, MM 7-16, MM 7-17, MM 7-18, MM 7-21, MM 7-22, and MM BIO-1). With implementation of these measures, the Project would have less than significant impacts to Crotch's bumble bee.

RPDEIR, Page 3-3, Section 3.0, Cumulative Impacts (Climate Change, Threshold 2.2-1)

As discussed further in Section 2.2, Climate Change, to fulfill the Settlement Agreement (SA) obligations, the Project has a contractual obligation to reduce GHG emissions by 500,000 metric tons per year, exceeding what would be necessary to achieve "net-zero" through implementation of various GHG reduction measures specified in the Settlement Agreement. As demonstrated in Section 2.2, with incorporation of ~~project design features (PDFs)~~the Project's mitigation measures and SA Mitigation Measures (~~SA MM-1, SA MM-2, SA MMs 6-9, SA MM-11, SA MM-12, SA MM-14, and SA MM-15~~SA MMs 1–3, SA MMs 6–10 and SA MMs 11–16), the Project would reduce more GHG emissions than it would generate and achieve "net zero" GHG emissions. Therefore, the Project would not make a cumulatively considerable contribution to significant cumulative impacts from GHG emissions.

3.2 REVISIONS TO THE DRAFT EIR AND 2019 FINAL EIR

SECTION 5.3, HAZARDS AND FIRE SAFETY

Draft EIR and 2019 Final EIR, Pages 5.3-28 through 5.3-39, Section 5.3, Hazards and Fire Safety (Section 5.3.3, Fire Safety)

Note: The fire safety analysis in Section 5.3.3 of the Draft EIR has been superseded by Section 2.3, Wildfire, of the Recirculated Partial Draft EIR. Refer to the analysis under Threshold 2.3-1 of the Recirculated Partial Draft EIR, which evaluates whether the Project would expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. MM 3-9 has been superseded by MM WILD-2.

SECTION 5.7, BIOLOGICAL RESOURCES

Draft EIR and 2019 Final EIR, Pages 5.7-175 and 5.7-176, Section 5.7, Biological Resources (Mitigation Measures – MM 7-2, Burrowing Owl Avoidance and Mitigation Measures)

MM 7-2 .....

Burrowing Owl Avoidance and Mitigation Measures

~~Submit for DRP and CDFW approval and subsequently implement a Burrowing Owl Exclusion Plan, which includes four avoidance and relocation strategy tiers and associated mitigation requirements set forth in the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012): Tier 1 – Avoidance Buffers; Tier 2 – Passive Relocation; Tier 3 – Prevention of Recolonization of Development Areas; and Tier 4 – Active Relocation (Optional). Site monitoring shall be required prior to, during, and after exclusions of burrowing owls from their burrows. Excluded burrowing owls shall be monitored and documented using artificial or natural borrows on adjoining Mitigation Preserve lands or other open space.~~

If active (occupied) burrowing owl burrows are detected, ~~A~~avoidance buffers shall be established in accordance with the buffer distances described in the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012), which range from 50 to 500 meters, depending on the season and level of disturbance. The buffers may be reduced, but only after consultation with and approval from CDFW.

If avoidance of an occupied burrow is infeasible, the Project Applicant shall consult with CDFW before conducting activities within the buffer. If CDFW determines that an Incidental Take Permit (ITP) or other take authorization is required, no activities that could result in take shall occur unless and until the

Project Applicant obtains the required authorization and complies with all conditions imposed by CDFW.

Passive relocation or burrow exclusion shall not occur during the breeding season, and shall be conducted by a qualified biologist. During the non-breeding season, passive relocation or burrow exclusion shall not occur unless authorized by CDFW pursuant to a Burrowing Owl Exclusion Plan approved through the ITP process or other applicable written authorization. At a minimum, the plan shall:

a. Confirm by site surveillance that the burrow(s) is empty of burrowing owls and other species preceding burrow scoping;

b. Type of scope to be used and appropriate timing of scoping to avoid impacts;

c. Occupancy factors to look for and what shall guide determination of vacancy and excavation timing (one-way doors should be left in place 48 hours to ensure burrowing owls have left the burrow before excavation, visited twice daily and monitored for evidence that owls are inside and can't escape i.e., look for sign immediately inside the door).

d. How the burrow(s) shall be excavated. Excavation using hand tools with refilling to prevent reoccupation is preferable whenever possible (may include using piping to stabilize the burrow to prevent collapsing until the entire burrow has been excavated and it can be determined that no owls reside inside the burrow);

e. Removal of other potential owl burrow surrogates or refugia onsite;

f. Photographing the excavation and closure of the burrow to demonstrate success and sufficiency.

…..

SECTION 5.11, AIR RESOURCES

Draft EIR and 2019 Final EIR, Page 5.11-80 and 5.11-81, Section 5.11, Air Resources (Mitigation Measure MM 11-5)

MM 11-5 The Project's plans and specifications for residential buildings shall demonstrate that the following features have been incorporated.

- Visitor parking shall include preferentially located parking spaces for electric vehicles.
- Exterior electrical receptacles ~~and natural gas or propane hookups~~.

- Bicycle parking shall be provided as specified in Section A4.106.9, Residential Voluntary Measures, of the CALGreen Code or as required by Section 22.52.1225B of the County Code, whichever is more stringent. The requirements under the Residential Voluntary Measures of the CALGreen Code are as follows:

Short-term bicycle parking. Provide permanently anchored bicycle racks within 100 feet of the visitor's entrance, readily visible to passers-by, for five percent of visitor motorized vehicle parking capacity within a minimum of one two-bike capacity rack.

Long-term bicycle parking for multifamily buildings. Provide on-site bicycle parking for at least one bicycle per every two dwelling units. Acceptable parking facilities shall be conveniently reached from the street and may include, but not limited to:

1. Covered, lockable enclosures with permanently anchored racks for bicycles.
2. Lockable bicycle rooms with permanently anchored racks.
3. Lockable, permanently anchored bicycle lockers.

Long-term bicycle parking for hotel and motel buildings. Provide one on-site bicycle parking space for every 25,000 square feet, but not less than two. Acceptable parking facilities shall be conveniently reached from the street and may include, but not be limited to:

1. Covered, lockable enclosures with permanently anchored racks for bicycles.
2. Lockable bicycle rooms with permanently anchored racks.
3. Lockable, permanently anchored bicycle lockers.

Bicycle parking areas may also be used by small electric vehicles such as scooters.

SECTION 5.21, CLIMATE CHANGE

Draft EIR and 2019 Final EIR, Pages 5.21-1 through 5.21-107, Section 5.21, Climate Change

Note: The climate change analysis in Section 5.21 of the Draft EIR has been superseded in full by Section 2.2, Climate Change, of the Recirculated Partial Draft EIR. Refer to Section 2.2 of the RPDEIR, pages 2.2-1 through 2.2-90, and RPDEIR Appendix D, for the updated climate

change analysis and calculations. The RPDEIR continues to rely on Appendix 5.11E of the 2019 Final EIR.

SECTION 8.0, ALTERNATIVES TO THE PROPOSED PROJECT

Draft EIR and 2019 Final EIR, Page 8-7, Section 8.0, Alternatives to the Proposed Project (Section 8.2.1, Summary of Proposed Project Impacts – Significant and Unavoidable Cumulative Impacts)

~~Climate Change: The Project is consistent with each of the Los Angeles County Community Climate Action Plan's (CCAP's) goals and policies, with SCAG's 2012–20 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the 2016–2040 RTP/SCS, the AVAP policies, and State regulatory programs that reduce greenhouse gas (GHG) emissions, including those that, as CARB has concluded, put California on a trajectory toward meeting the 2050 GHG reduction goals set forth in several Executive Orders. The Project would nonetheless emit GHGs at an estimated rate of 244,379 metric tons of carbon dioxide equivalent per year, and would contribute to the global inventory of GHGs. The Project's GHG efficiency would be 3.02, which would not exceed the SCAQMD-staff-proposed "plan-level" 4.1 GHG efficiency threshold, but would exceed the SCAQMD-staff-proposed "project-level" 3.0 GHG efficiency threshold. To date, the vast majority of other states and nations have not followed California's lead in mandating GHG emission reductions across a broad spectrum of economic sectors and have not enacted regulations similar to those adopted in California, which already has nearly the lowest level of GHG per capita of any state. The County of Los Angeles has no jurisdictional control or responsibility for GHG reductions from many types of products and activities (e.g., passenger vehicles, consumer products) both on site and elsewhere in California, nor does the County have jurisdiction or control of GHG emissions outside California within or outside the United States. Therefore, because of the global context of GHG emissions and the Project's forecasted GHG emission rate, the environmental impact related to greenhouse gas emissions is considered to be cumulatively significant.~~

Climate Change: The Project's GHG emissions were reevaluated in Section 2.2, Climate Change, of the Recirculated Partial Draft EIR. With implementation of the SA MMs and the Project's mitigation measures, the Project would achieve net zero GHG emissions and would not make a cumulatively considerable contribution to significant cumulative impacts from GHG emissions. Therefore, climate change is no longer a significant and unavoidable cumulative impact of the Project.

Draft EIR and 2019 Final EIR, Pages 8-10 and 8-11, Section 8.0, Alternatives to the Proposed Project (Section 8.4, Alternatives to the Proposed Project)

Additionally, there are ~~three~~two environmental issues that have mitigation measures to minimize environmental impacts, but the ability to implement the mitigation measures is outside the authority of the County of Los Angeles, the Lead Agency under CEQA.

The first issue is traffic. Implementation of the needed improvements to SR-138 and I-5 must go through Caltrans review, approval, and implementation. These improvements are currently being evaluated for implementation and are expected to be developed in the future. The Project Applicant is working with Caltrans to ensure that the improvements proceed in the needed timeframe. The second issue is noise impacts on existing noise-sensitive receptors. The Project Applicant has discussed this issue with the County, but the County has no enforcement mechanism on private properties and Caltrans right-of-way to implement noise reduction measures. ~~The third issue relates to compliance with Assembly Bill (AB) 32. Even if the County implements measures to comply with their share of the greenhouse gas reduction, they have no control over the compliance of other areas outside the County and in other areas of the State of California. All~~ Both of these issues are outside the authority of the County and the ability to mitigation to a less than significant level cannot be assured.

In summary, Project-related significant and unavoidable topical areas that are addressed by the alternatives include:

- Air Resources
- Biological Resources
- ~~Climate Change~~
- Land Resources (Agricultural)
- Noise
- Population and Growth-Inducing Impacts

Draft EIR and 2019 Final EIR, Page 8-24, Section 8.0, Alternatives to the Proposed Project (Section 8.4.3, Table 8-2, Comparison of Alternatives' Impacts to the Centennial Project – 5.21 Climate Change, Significant emissions row)

Project / Alternative	**Significant emissions**
Centennial Project	~~Significant and Unavoidable (cumulative)~~ Less than Cumulatively Considerable with Mitigation
Alternative A, No Project	Less than/ No Impact
Alternative B, Previously Proposed Project	~~Greater than/ Significant and Unavoidable~~ Greater than/ Less than Cumulatively Considerable with Mitigation
Alternative C, Additional Drainage Avoidance	~~Less than/ Significant and Unavoidable~~ Less than/ Less than Cumulatively Considerable with Mitigation
Alternative D, Infrastructure Relocation	~~Less than/ Significant and Unavoidable~~ Less than/ Less than Cumulatively Considerable with Mitigation
Alternative E, Density Clustering/East of Aqueduct	~~Similar/ Significant and Unavoidable~~ Similar/ Less than Cumulatively Considerable with Mitigation
Alternative F, Central EOA Development	~~Similar/ Significant and Unavoidable~~ Greater than/ Significant and Unavoidable

Draft EIR and 2019 Final EIR, Page 8-34, Section 8.0, Alternatives to the Proposed Project (Section 8.4.5, Alternative B: Previously Proposed Project – Climate Change)

With an increase in development associated with Alternative B, greenhouse gas emissions would also be increased by a comparable amount. Assuming Alternative B would be subject to the same net zero commitment and GHG mitigation measures as the Project, c~~C~~umulative impacts to climate change under Alternative B would be ~~significant and unavoidable~~less than cumulatively considerable with mitigation, similar to the Project. This Alternative would require a General Plan Amendment, and may result in greater impacts related to conflict with County's Climate Action Plan.

Draft EIR and 2019 Final EIR, Page 8-41, Section 8.0, Alternatives to the Proposed Project (Section 8.4.6, Alternative C: Additional Drainage Avoidance – Climate Change)

With a decrease in development associated with Alternative C, greenhouse gas emissions would also be decreased by a comparable amount. ~~However, c~~Cumulative impacts to climate change would be ~~significant and unavoidable~~less than cumulatively considerable with mitigation, similar to the Project~~, because Alternative C would not substantially reduce development to a degree that could eliminate the cumulative impact~~. This Alternative and the proposed Project would not conflict with the County's Climate Action Plan.

Draft EIR and 2019 Final EIR, Page 8-48, Section 8.0, Alternatives to the Proposed Project (Section 8.4.7, Alternative D: Infrastructure Relocation – Climate Change)

With the same development associated with Alternative D, greenhouse gas emissions from development would be similar to the Project. However, the use of less energy for water pumping based on the location of the water tanks at higher elevations would slightly reduce GHG emissions. ~~However, c~~Cumulative impacts to climate change under Alternative D would be ~~significant and unavoidable~~less than cumulatively considerable with mitigation, similar to the Project. This Alternative and the proposed Project would be consistent with the County's Climate Action Plan.

Draft EIR and 2019 Final EIR, Page 8-55, Section 8.0, Alternatives to the Proposed Project (Section 8.4.8, Alternative E: Density Clustering/East of Aqueduct – Climate Change)

With the same development associated with Alternative E, greenhouse gas emissions from development would be similar to the Project. Cumulative impacts to climate change under Alternative ~~D~~E would be ~~significant and unavoidable~~less than cumulatively considerable with mitigation, similar to the Project. Greenhouse gas emissions from vehicle use would be slightly lower based on projected mode shifts (i.e., reduced use of fossil-fired vehicles) for on-site trips as described in Air Quality, above. This Alternative and the proposed Project would result in less than significant impacts at the project-level related to climate change policies.

Draft EIR and 2019 Final EIR, Page 8-64, Section 8.0, Alternatives to the Proposed Project (Section 8.4.9, Alternative F: Central Economic Opportunity Area Development – Climate Change)

With the same development associated with Alternative F, greenhouse gas emissions from development would be similar to the Project. As discussed above under "Land Use, Entitlements, and Planning", development of an equivalent land use plan within the Central EOA is inconsistent with the approved 2016–2040 RTP/SCS, which is the region's approved land use and transportation plan pursuant to SB 375). Accordingly, development of a master planned community on lands not anticipated as part of the RTP/SCS thereby reduces the ability of the County and the State to achieve its GHG reduction targets under AB 32, as implemented through SB 375. In addition, Alternative F would be located off the Project site and would not be subject to the Settlement Agreement's net zero commitment that applies to the Project. Therefore, ~~Alternative F would result in~~ impacts related to climate change would be greater under Alternative F, and Alternative F would result in a ~~greater~~ significant and unavoidable impact related to climate change ~~impacts~~that would not occur under the Project.

Draft EIR and 2019 Final EIR, Page 8-71, Section 8.0, Alternatives to the Proposed Project (Section 8.6, Environmentally Superior Alternative)

Alternative F would not meet three of the five Project Objectives, and would result in additional significant and unavoidable impacts ~~to~~ related to land use, population projections, ~~and~~ water supply, and climate change and greater significant and unavoidable impacts related to growth-inducing impacts ~~and climate change~~. However, Alternative F would avoid significant and unavoidable impacts to sensitive vegetation communities and wildlife movement, as it is anticipated these impacts would be cumulatively less than significant with mitigation.

3.3 REVISIONS TO THE CONSOLIDATED 2019 FINAL EIR

SECTION 4.3, CONFORMED AND ANNOTATED DRAFT EIR

Consolidated 2019 Final EIR, Section 4.3, Conformed and Annotated Draft EIR, Section 5.21, Climate Change (Annotation 2, Updated GHG Table 3) and Updated Greenhouse Gas Calculations for the Centennial Project (Table 3)

Note: Section 5.21, Climate Change, of the Conformed and Annotated Draft EIR (Consolidated 2019 Final EIR, Section 4.3) has been superseded in full by Section 2.2, Climate Change, of the RPDEIR. Refer to Section 2.2 of the RPDEIR for the current analysis of the Project's greenhouse gas emissions and climate change impacts. The RPDEIR continues to rely on Appendix 5.11E of the 2019 Final EIR.

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Appendix A

Notices of Availability

LA COUNTY PLANNING

AMY J. BODEK, AICP
Director,
Regional Planning

DENNIS SLAVIN
Chief Deputy Director,
Regional Planning

NOTICE OF COMPLETION AND AVAILABILITY
OF RECIRCULATED PARTIAL DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE
"CENTENNIAL SPECIFIC PLAN PROJECT"
PROJECT NO. 02-232
SPECIFIC PLAN NO. RPPL2026001458
DEVELOPMENT AGREEMENT RPPL2026001463
GENERAL PLAN AMENDMENT RPPL2026001466
ZONE CHANGE RPPL2026001461
CONDITIONAL USE PERMIT RPPL2026001462
VESTING TENTATIVE PARCEL MAP RPPL2026001455
STATE CLEARINGHOUSE NO. 2024031142
(PRIOR STATE CLEARINGHOUSE NO. 2004031072)

The Los Angeles County Department of Regional Planning ("County Planning"), acting in the capacity of "Lead Agency" under Los Angeles County's ("County's") Environmental Guidelines, Chapter III, Section 304, has filed a "Notice of Completion and Availability" of a Recirculated Partial Draft Environmental Impact Report ("RPDEIR") for the Centennial Specific Plan Project ("Project"). This document has been prepared in accordance with, and pursuant to, the California Environmental Quality Act ("CEQA"), as amended; Public Resources Code, Section 21000 et seq.; and the "Guidelines for Implementation of the California Environmental Quality Act" (State CEQA Guidelines), California Code of Regulation, Title 14, Chapter 15000 et seq.

PUBLIC REVIEW PERIOD

The formal public review period for the RPDEIR will be from **May 28, 2026 to July 12, 2026** (45 days). All comments received by the closing of the public review period will be considered in the Revised Final Environmental Impact Report ("RFEIR").

PROJECT LOCATION

The 12,323-acre Project site is located in the northwestern portion of the Antelope Valley in an unincorporated portion of Los Angeles County and is contiguous to the southern boundary of Kern County. The Project site's western boundary is approximately one mile east of Interstate 5 (I-5). State Route 138 (SR-138) bisects the southern portion of the Project site. The Project site is located approximately 50 miles south of Bakersfield, 5 miles east of Gorman, 36 miles west of Lancaster, and 35 miles north of Santa Clarita.

PROJECT BACKGROUND

On April 30, 2019, Los Angeles County certified the Centennial Project Environmental Impact Report, State Clearinghouse No. 2004031072 ("2019 EIR") and issued initial entitlement approvals for the (a) the Centennial Specific Plan to govern the Project's development, (b) a General Plan Amendment to amend the highway maps of the Countywide General Plan and the County's Antelope Valley Area Plan, (c) a Zoning Ordinance Amendment to change the property's zoning from Open Space Light-Agricultural (two acre minimum required lot area), Residential Planned Development, Commercial Planned Development and Manufacturing Planned Development to Specific Plan (SP), (d) a Vesting Tentative Parcel Map to create 20 large-lot parcels on 8,408 acres of the Property for lease, conveyance and financing purposes only, (e) a Conditional Use Permit (CUP)

to authorize the Specific Plan development process, and (f) a statutory Development Agreement to vest the approved land use entitlements and provide specified community benefits including but not limited to affordable housing (collectively, the "Approved Project").

Although the 2019 EIR was certified by the Los Angeles County Board of Supervisors, it was subsequently challenged in two separate lawsuits, one of which was brought by Climate Resolve and the other was brought by the Center for Biological Diversity and California Native Plant Society (referred to collectively herein as "CBD/CNPS"), as further described below.

On April 5, 2021, the Los Angeles County Superior Court issued two orders (collectively, the "Court Order") rejecting all CBD/CNPS claims and arguments that the Centennial EIR was deficient under CEQA, upholding the vast majority of the Centennial EIR, and granting in part Climate Resolve's petition for writ of mandate on two grounds—(1) the Centennial EIR's discussion of GHG emissions improperly relied on state cap-and-trade regulations to reduce GHG emissions impacts below the level of significance, and (2) the Centennial EIR failed to analyze off-site wildfire impacts beyond the Project site. Following issuance of the Court Order, but prior to final judgment in the Climate Resolve action, the Project Applicant and Climate Resolve entered into a legally enforceable settlement agreement to finally resolve the Climate Resolve litigation ("Settlement Agreement"). The Settlement Agreement became effective and fully enforceable on November 30, 2021. The Settlement Agreement addresses the key issues identified in the Court's ruling in the Climate Resolve litigation: projected impacts related to climate change and wildfire, as discussed in more detail in Section 1.0, Introduction, of the RPDEIR.

In March 2023, after initially denying in full CBD/CNPS's petition for writ of mandate, the Superior Court, following CBD/CNPS's motion for reconsideration, entered judgment (a) in favor of CBD/CNPS solely on the abovementioned GHG emissions and off-site wildfire impacts grounds raised in the Climate Resolve petition and (b) in favor of the County on all other claims and causes of action (the "Judgment"). The Superior Court ordered issuance of a writ of mandate directing the County to set aside its certification of the Centennial EIR and Centennial Project Approvals and suspending all Project activity until the County complies with the requirements of CEQA with respect to the Centennial EIR deficiencies identified in the Superior Court Order (the "Writ").

In May 2023, the Project Applicant appealed the Judgment to the Second District Court of Appeal, and CBD/CNPS filed a cross-appeal in June 2023. While the County did not appeal the Judgment, it did file a brief in response to CBD/CNPS's cross-appeal of the trial court's determination that the Centennial EIR's analysis of Project alternatives was lawful under CEQA, which determination was ultimately affirmed by the Court of Appeal. The Judgment and Writ stayed pending determination of the appeal and cross-appeal.

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In September 2025, the Court of Appeal issued remittitur, thereby transferring jurisdiction over the Centennial Litigation back to the Superior Court. Thereafter, on September 22, 2025, the Superior Court

issued the Writ.

On December 2, 2025, in compliance with the Writ, the Board of Supervisors adopted a resolution (i) vacating and setting aside all approvals and adoption of the Centennial Project Approvals, (ii) vacating and setting aside certification of the Centennial EIR, prepared in connection with the Centennial Project, the Findings, Statement of Overriding Consideration, and Mitigation Monitoring and Reporting Program adopted in connection with the Centennial Project, and (iii) suspending any and all specific project activity or activities, pursuant to the Centennial Project Approvals that could result in an adverse change or alteration to the physical environment, unless and until the County complies with the requirements of CEQA. On December 19, 2025, the County filed the return to the Writ in the Superior Court and a Proposed Order discharging the Writ.

By its December 2025 action, the County vacated and set aside its certification of the Centennial EIR. However, the document itself remains intact, albeit in need of revision to address the deficiencies identified in the Opinion. The Recirculated Partial Draft EIR addresses those deficiencies.

PROJECT DESCRIPTION

The Project involves the development of a master planned community with 19,333 residential units. Other land uses include approximately 7,363,818 square feet (sf) of Business Park uses (office, research and development, and warehousing or light manufacturing uses) on approximately 597 gross acres; and approximately 1,034,550 sf of Commercial uses on approximately 102 acres. Proposed Institutional/Civic land uses (such as schools for higher education, medical facilities, library, and other civic uses) encompass approximately 1,568,160 sf on approximately 110 acres.

The Project includes approximately 130,680 sf of Recreation/Entertainment uses (clubhouse, farmers market, childcare facilities, health clubs) on approximately 75 acres. Proposed sites for major Utility facilities that would serve the entire community (e.g., wastewater reclamation facilities, water treatment facility, water bank, materials recovery facility) encompass approximately 191 acres, and Kindergarten through 12th grade (K-12 schools would be located on approximately 145 acres). Approximately 5,624 acres (approximately 45.6 percent) of the 12,323-acre Project site are proposed for Open Space for natural resource protection and greenways, and parks for active and passive recreational use. The Project also includes a vehicular and a non-vehicular circulation system.

The Project includes an integrated network of roadways walking and biking trails to reduce automobile use and facilitate safe and efficient travel. An extensive network of sidewalks, greenway trails (approximately 13 miles), and community trails (approximately 60 miles) would link residential, schools, shopping, and employment areas.

Two minor changes are proposed to the Specific Plan since it was approved in April 2019. First, the Project would add local microgrid electrical distribution systems as a permitted land use to serve the Specific Plan Area with renewable energy generated on-site in support of the Project's "Net Zero" GHG program. Second, the Project proposes to dedicate a majority of the Cement Road Realignment as a public road to improve fire resiliency.

The addition of local microgrid electrical distribution systems as a permitted land use would revise Specific Plan Table 2-16 to add "Renewable Energy Microgrids" as a new land use type within the "Accessory Uses and

Structures" category of use types, and would designate the use as "P" (i.e., Permitted) within the Specific Plan's Very Low Density Residential (VRDR), Low Density Residential (LDR), Medium Density Residential (MDR), High Density Residential (HDR), Very High Density Residential (VHDR), Mixed Use (MU), Commercial (C), Business Park (BP), School, Recreation/Entertainment (RE), Utility (U), and Institutional/Civic (I/C) land use designations, and would designated the use as "M" (i.e., Permitted with Ministerial Review) within the Specific Plan's Park land use designation. The addition of this new permitted land use does not propose a specific microgrid electrical distribution system project; new microgrid electrical distribution systems would be specifically regulated by the Specific Plan but individual projects may or may not be proposed and developed.

THE RECIRCULATED PARTIAL DRAFT ENVIRONMENTAL IMPACT REPORT

Pursuant to State CEQA Guidelines Section 15088.5, subdivision (g), this Recirculated Partial Draft EIR contains the following revised and updated portions and/or sections to be recirculated for public comment:

- **Introduction** – Provides introductory context for the RPDEIR (RPDEIR Section 1.0);
- **Biological Resources** – Updated Partial Biological Resources analysis as to impacts of the Project to Crotch's bumble bee (RPDEIR Section 2.1).
- **Climate Change** – Updated Climate Change/Greenhouse Gas Emissions analysis as to eliminating discussion of the state cap-and-trade program to the Project emissions analysis and mitigation (RPDEIR Section 2.2);
- **Wildfire** – Updated Wildfire analysis as to off-site impacts of the Project and impacts of the Project's off-site components (RPDEIR Section 2.3).
- **Cumulative Impacts** – Updated Partial Cumulative Impacts analysis related to Biological Resources, Climate Change, and Wildfire (RPDEIR Section 3.0).

Because the Recirculated Partial Draft EIR is limited to revising only a few portions of the Centennial EIR, only the revised portions of the Centennial EIR are being recirculated for public review and comment in accordance with Subdivision (c) of State CEQA Guidelines Section 15088.5. The Recirculated Partial Draft EIR, along with any responses to comments or revisions, will become the final volume of the Centennial EIR, and will be presented to the County for certification as part of a Revised Final EIR, along with those portions of the 2019 EIR that are not being recirculated.

SUMMARY OF SIGNIFICANT ENVIRONMENTAL IMPACTS

The 2019 EIR concluded that impacts associated with the Project would result in significant and unavoidable environmental impacts related to Agriculture and Forest Resources, Population and Housing, Air Resources, Noise, Visual Resources, Other Public Services - Solid Waste Management, Climate Change, and Cumulative Impacts. The RPDEIR evaluates the potential for Project-level and cumulative environmental impacts associated with Climate Change, Wildfire, and Biological Impacts (Crotch's bumble bee only). The RPDEIR concludes that the Project will not result in significant and unavoidable Project-level or cumulative impacts related to these resource areas.

PUBLIC HEARING

A public hearing on the proposed Project and the RPDEIR will be scheduled before the Los Angeles County Regional Planning Commission at a time and date to be determined.

REVIEWING LOCATION

A digital copy of the RPDEIR is available for public review at Los Angeles County Department of Regional Planning web addresses at https://planning.lacounty.gov/long-range-planning/centennial-specific-plan/ . The 2019 EIR can also be viewed at this location. In addition, copies of the RPDEIR are available at the following locations:

- County of Los Angeles Building and Safety Antelope Valley Field Office, 335 East Avenue K-6 #A, Lancaster California 93535
- Castaic Library, 27971 Sloan Canyon Road, Castaic, California 91384

Please direct all written comments to the following address:

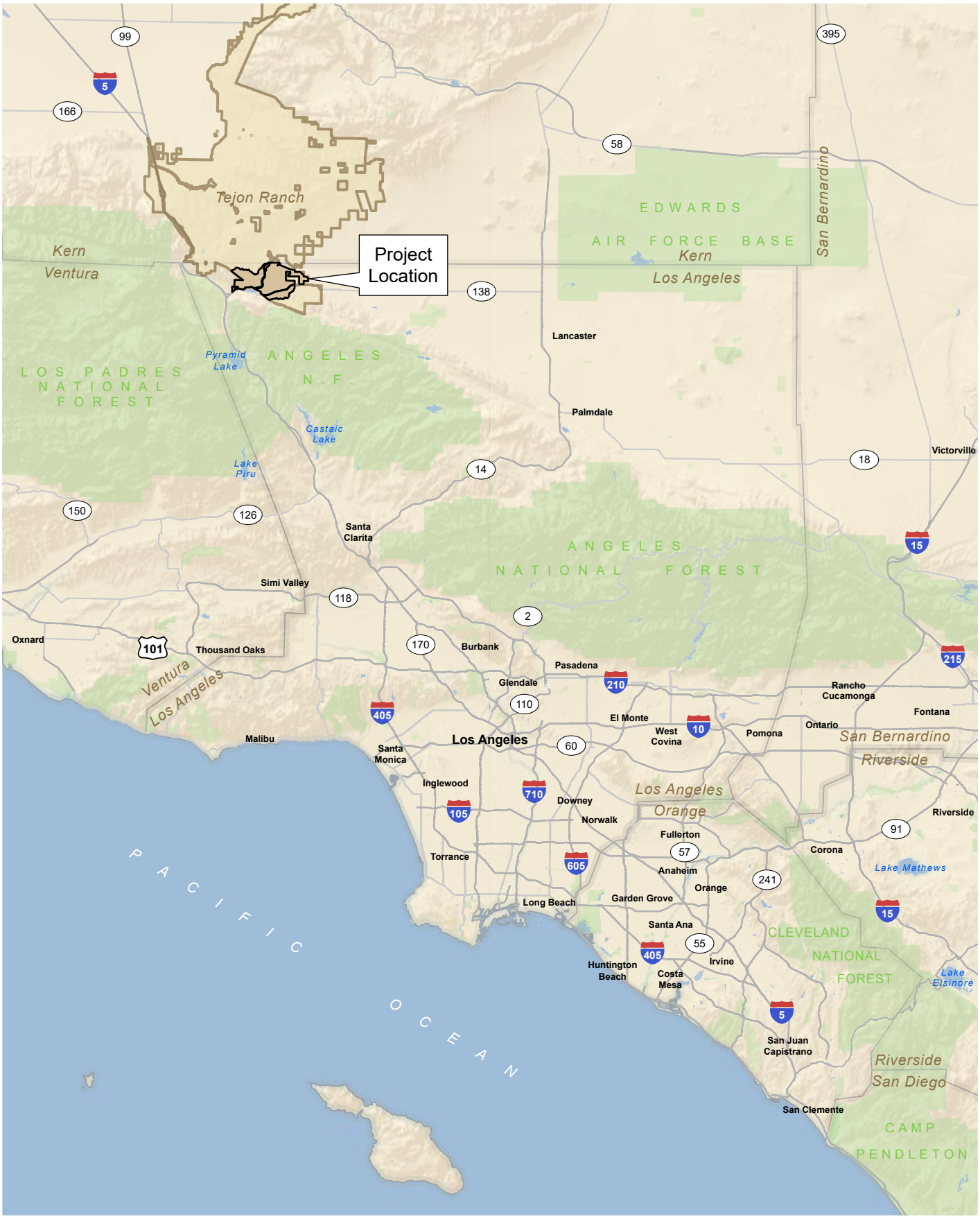
ATTN: Mr. Jodie Sackett, Senior Planner, Subdivisions Section
Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012

Telephone: (**213) 893-7409**
E-mail: jsackett@planning.lacounty.gov

All written responses need to be received or postmarked on or before **July 12, 2026 at 5:00 PM**, and will be included in the Revised Final EIR, which will be posted at the Department website location listed above. Because the 2019 EIR is revised only in part, and the Department is recirculating only the revised portions of the 2019 EIR, the Department is requesting that reviewers limit comments to the content of the RPDEIR. Responses to comments already received on the 2019 EIR were prepared previously and will be included in the Revised Final EIR.

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BITLY LINK: https://bit.ly/centennial-specific-plan



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Regional Location

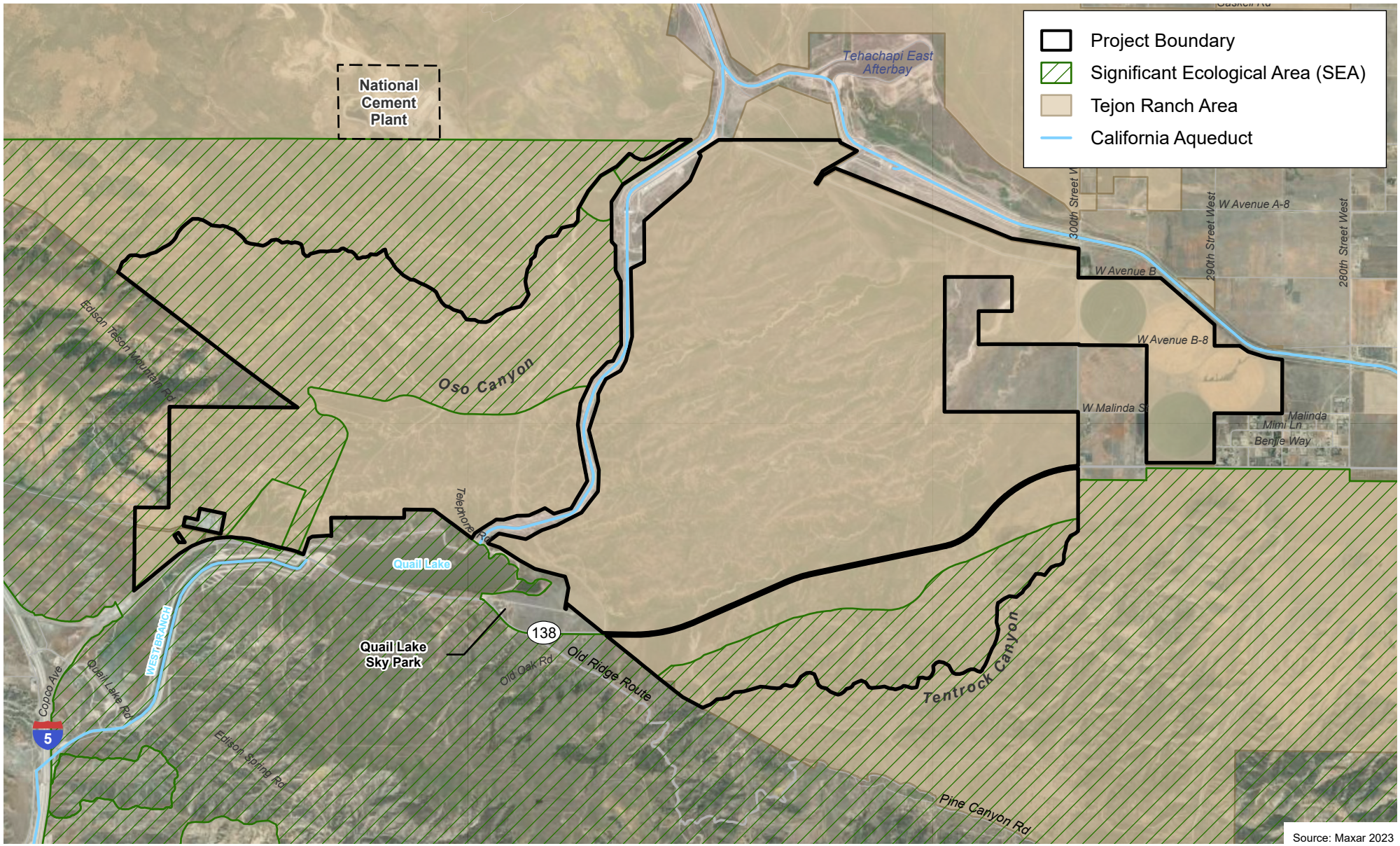
Exhibit 1

Centennial Project

N
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(Rev: 3-27-2024 PLO) R:\Projects\CEN\3CEN000307\Graphics\NOP\ex_RL.pdf



D:\Projects\3CEN\Centennial\PRO\Centennial_TejonRanch\ex_Aerial

Aerial and Project Boundary

Exhibit 2

Centennial Project

N W E S

1 0.5 0 1 Miles

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LA COUNTY PLANNING

AMY J. BODEK, AICP
Director,
Regional Planning

DENNIS SLAVIN
Chief Deputy Director,
Regional Planning

NOTICE OF COMPLETION AND AVAILABILITY OF RECIRCULATED PARTIAL DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE "CENTENNIAL SPECIFIC PLAN PROJECT" PROJECT NO. 02-232 SPECIFIC PLAN NO. RPPL2026001458 DEVELOPMENT AGREEMENT RPPL2026001463 GENERAL PLAN AMENDMENT RPPL2026001466 ZONE CHANGE RPPL2026001461 CONDITIONAL USE PERMIT RPPL2026001462 VESTING TENTATIVE PARCEL MAP RPPL2026001455 STATE CLEARINGHOUSE NO. 2024031142 (PRIOR STATE CLEARINGHOUSE NO. 2004031072)

THIS NOTICE WAS POSTED

ON June 30 2026

UNTIL July 30 2026

REGISTRAR – RECORDER/COUNTY CLERK

2026 142680

FILED
Jun 30 2026

Dean C. Logan, Registrar – Recorder/County Clerk

Electronically signed by SAVANNAH RODRIGUEZ

On May 28, 2026, the Los Angeles County Department of Regional Planning ("County Planning"), acting in the capacity of "Lead Agency" under Los Angeles County's ("County's") Environmental Guidelines, Chapter III, Section 304, filed a "Notice of Completion and Availability" of a Recirculated Partial Draft Environmental Impact Report ("RPDEIR") for the Centennial Specific Plan Project ("Project"). This document was prepared in accordance with, and pursuant to, the California Environmental Quality Act ("CEQA"), as amended; Public Resources Code, Section 21000 et seq.; and the "Guidelines for Implementation of the California Environmental Quality Act" (State CEQA Guidelines), California Code of Regulation, Title 14, Chapter 15000 et seq. The RPDEIR included revised and updated analysis related to Biological Resources, Climate Change, and Wildfire. The formal public review period for the RPDEIR was anticipated to conclude on July 12, 2026.

Now, County Planning has determined that recirculation of the RPDEIR is warranted due to the inadvertent omission of Section 3.0, Cumulative Impacts, and a labeling correction to a mitigation measure identified in Section 2.1, Biological Resources. No other changes have been made to the RPDEIR originally circulated on May 28, 2026. The RPDEIR in its entirety is being recirculated for a new 45-day public review and comment period.

PUBLIC REVIEW PERIOD

The formal public review period for the RPDEIR will be from **June 30, 2026 to August 13, 2026** (45 days). All comments received by the closing of the public review period will be considered in the Revised Final Environmental Impact Report ("RFEIR").

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The addition of local microgrid electrical distribution systems as a permitted land use would revise Specific Plan Table 2-16 to add "Renewable Energy Microgrids" as a new land use type within the "Accessory Uses and Structures" category of use types, and would designate the use as "P" (i.e., Permitted) within the Specific Plan's Very Low Density Residential (VRDR), Low Density Residential (LDR), Medium Density Residential (MDR), High Density Residential (HDR), Very High Density Residential (VHDR), Mixed Use (MU), Commercial (C), Business Park (BP), School, Recreation/Entertainment (RE), Utility (U), and Institutional/Civic (I/C) land use designations, and would designated the use as "M" (i.e., Permitted with Ministerial Review) within the Specific Plan's Park land use designation. The addition of this new permitted land use does not propose a specific microgrid electrical distribution system project; new microgrid electrical distribution systems would be specifically regulated by the Specific Plan but individual projects may or may not be proposed and developed.

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SUMMARY OF SIGNIFICANT ENVIRONMENTAL IMPACTS

The 2019 EIR concluded that impacts associated with the Project would result in significant and unavoidable environmental impacts related to Agriculture and Forest Resources, Population and Housing, Air Resources, Noise, Visual Resources, Other Public Services - Solid Waste Management, Climate Change, and Cumulative Impacts. The RPDEIR evaluates the potential for Project-level and cumulative environmental impacts associated with Climate Change, Wildfire, and Biological Impacts (Crotch's bumble bee only). The RPDEIR concludes that the Project will not result in significant and unavoidable Project-level or cumulative impacts related to these resource areas.

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PUBLIC HEARING

A public hearing on the proposed Project and the RPDEIR will be scheduled before the Los Angeles County Regional Planning Commission at a time and date to be determined.

REVIEWING LOCATION

A digital copy of the RPDEIR is available for public review at Los Angeles County Department of Regional Planning web addresses at https://planning.lacounty.gov/long-range-planning/centennial-specific-plan/ . The 2019 EIR can also be viewed at this location. In addition, copies of the RPDEIR are available at the following locations:

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- Castaic Library, 27971 Sloan Canyon Road, Castaic, California 91384

Please direct all written comments to the following address:

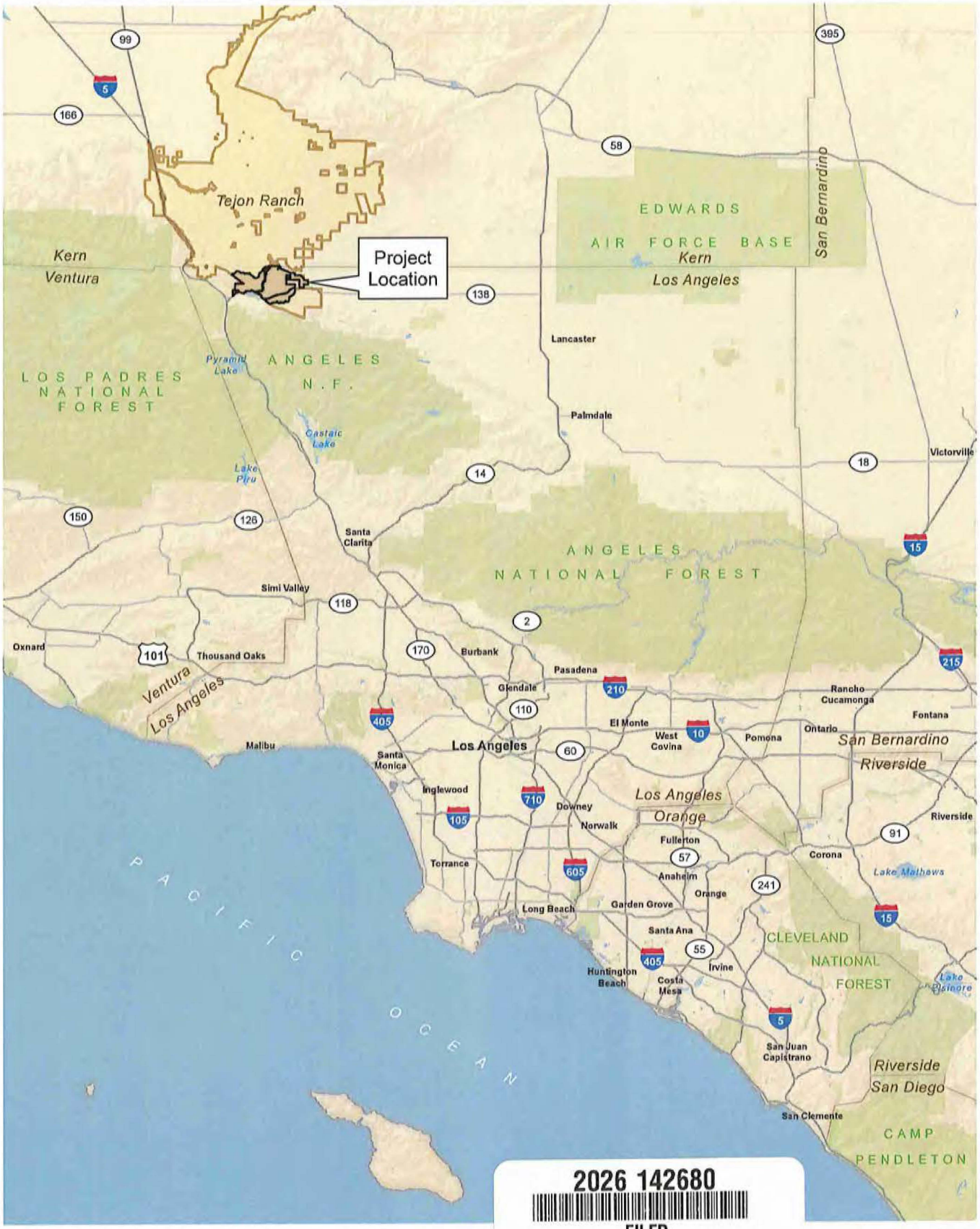
ATTN: Mr. Jodie Sackett, Senior Planner, Subdivisions Section
Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012

Telephone: **(213) 893-7409**
E-mail: jsackett@planning.lacounty.gov

All written responses need to be received or postmarked on or before **August 13, 2026 at 5:00 PM**, and will be included in the Revised Final EIR, which will be posted at the Department website location listed above. Because the 2019 EIR is revised only in part, and the Department is recirculating only the revised portions of the 2019 EIR, the Department is requesting that reviewers limit comments to the content of the RPDEIR. Responses to comments already received on the 2019 EIR were prepared previously and will be included in the Revised Final EIR.

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BITLY LINK: https://bit.ly/centennial-specific-plan



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Jun 30 2026

Dean C. Logan, Registrar – Recorder/County Clerk

Electronically signed by SAVANNAH RODRIGUEZ

Regional Location

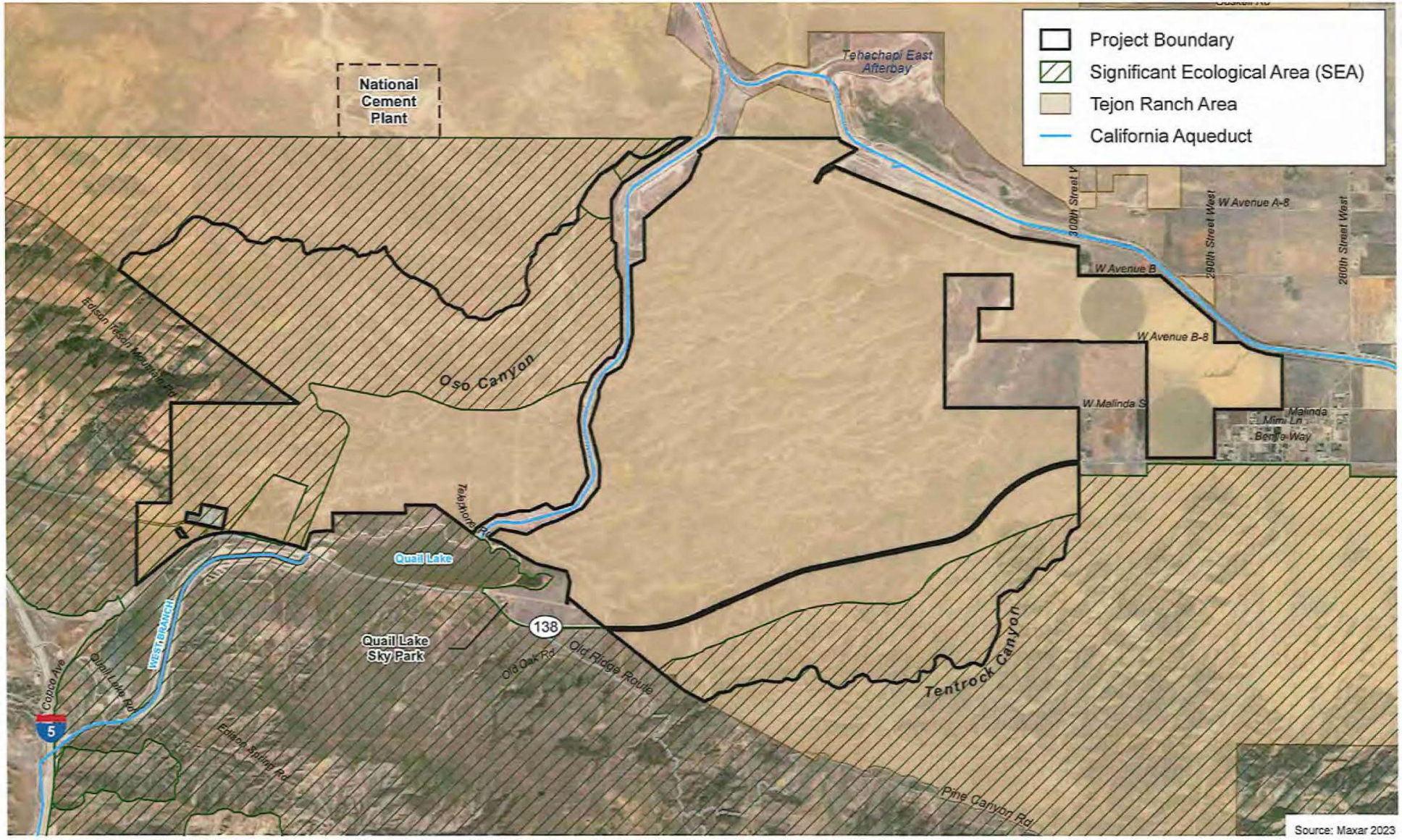
Centennial Project

Exhibit 1

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Aerial and Project Boundary

Centennial Project

N W E S

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Jun 30 2026

Dean C. Logan, Registrar – Recorder/County Clerk

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Exhibit 2

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Appendix B

Evaluation of Baseline Biological Surveys Conducted for the Centennial Specific Plan Project Biological Memorandum

MEMORANDUM

November 10, 2026

Subject: Evaluation of Baseline Biological Surveys Conducted for the Centennial Specific Plan Project

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The purpose of this memorandum is to confirm whether the baseline surveys and other technical reports undertaken to characterize biological resources for the Centennial Specific Plan Project accurately characterize existing conditions with the potential to be impacted by Project development. Additionally, the current regulatory status of plant and wildlife species occurring or potentially occurring in the region were reviewed to determine if changes have occurred since the EIR impact assessments were conducted, between 1999 and 2015. These prior studies included numerous focused surveys and technical evaluations undertaken to characterize biological resources on the Project site. The updated review was performed to assess whether changes in regulatory status or site conditions warrant conducting new surveys for the collection of additional baseline biological data and subsequent re-assessment of Project impacts. The findings of this evaluation are intended to analyze whether prior biological studies remain sufficient to characterize existing conditions for the biological baseline and to support determination of whether additional survey efforts are necessary.

METHODOLOGY

Current conditions were assessed using several methods. Recent aerial photography of the Project site was analyzed for evidence of changes in land use or major disturbance and then compared with previous aerial imagery used during the EIR impacts assessment using Google Earth (1999–2025). The recently prepared Crotch's bumble bee habitat assessment survey report, including site photos, and associated field notes, was also reviewed. Tejon Ranch staff were also consulted to confirm grazing operations and more general patterns of use that could affect biological resources. Regional fire history was reviewed using the California Department of Forestry and Fire Protection's (CAL FIRE's) Fire and Resource Assessment Program (FRAP) Historical Fire Perimeters dataset (CAL FIRE 2026). And lastly, regional rainfall records were reviewed to compare the past 15 years with the historical record for the region (PRISM Climate Group 2026).

To review the current federal and State listing status and designated critical habitat of special-status plant and wildlife species in the region, the U.S. Fish and Wildlife Service's ECOSphere Threatened & Endangered Species Active Critical Habitat Report was reviewed for information on federally listed species and designated critical habitat (USFWS 2026b). California Department of Fish and Wildlife's Endangered and Threatened Animals List (CDFW 2026e), Special Animals List (CDFW 2026c), List of State and Federally-Listed Endangered, Threatened and Rare Plants of California (CDFW 2026f), Special Vascular Plants, Bryophytes, and Lichens List (CDFW d), and Natural Communities List (CDFW 2026a), were also reviewed. The CNPS Rare Plant Inventory was consulted for California Rare Plant Ranks (CRPRs) (CNPS 2026).

RESULTS

Site Conditions

Review and comparison of aerial imagery revealed no evidence of substantial changes in patterns of land use or major disturbance on the Project site. The site conditions present at the time of the initial EIR biological resources surveys and EIR impact assessment appear to be largely unchanged. Grazing and associated practices appear to have continued within the same general footprints as originally documented in the EIR. Additionally, review of the Crotch's bumblebee habitat assessment survey data indicates no observations of notable site disturbance, changed conditions, or change in vegetation distribution or composition. Review of Regional fire history was consistent with observed conditions showing one minor fire along Cement Plant Road, with no major fires affecting the site. Review of one additional database, NOAA's Regional Climate Centers Applied Climate Information System, indicated that average rainfall amounts within the past 15 years are consistent with the historic record for the region with no significant difference.

Special-Status Species Regulatory Updates

Special Status Wildlife

Since preparation of the Draft EIR, 2019 Final EIR, and Consolidated 2019 Final EIR, regulatory status changes affecting special-status species have occurred. Crotch's bumble bee (*Bombus crotchii*) was advanced to State Listing Candidate status in 2023. Western spadefoot (*Spea hammondii*), which was not previously listed, was proposed for federal listing as Threatened in 2023 and became a candidate for listing under CESA in 2026. Tricolored blackbird (*Agelaius tricolor*) was advanced from candidate status and formally listed as State Threatened in 2019, with protections focused on nesting colonies. Western burrowing owl (*Athene cunicularia*) was advanced from non-listed status and designated as a candidate for listing under the California Endangered Species Act in 2024. The California Fish and Game Commission voted in February 2026 to list specified distinct Southern California and Central Coast mountain lion populations as threatened under CESA. In addition, yellow-blotched salamander (*Ensatina eschscholtzii croceater*) was reclassified by the CDFW from Species of Special Concern to Watch List status in recent updates to the Special Animals List (CDFW 2026c).

Special Status Plants

Since completion of the plant surveys, two regulatory changes affecting special-status plants occurred. Round-leaf filaree (*California macrophylla*), which was observed on site during focused special-status plant surveys, was removed from the California Rare Plant Rank, having been downgraded from a CRPR 1B designation to not listed in subsequent updates to the CNPS Rare Plant Inventory (CNPS 2026). Additionally, the western Joshua tree underwent a change in regulatory status in 2020 and is now designated as a candidate species under the California Endangered Species Act, with additional protections provided under the Western Joshua Tree Conservation Act. The western Joshua tree was not observed on the Project site.

Evaluation of Past Biological Surveys/Studies

Numerous focused biological surveys have been conducted within the Project site over an approximately 15-year period, which provide a basis for establishing whether there has been any significant change to baseline biological conditions. These surveys included focused assessments for special-status plant and wildlife species, jurisdictional waters, and wildlife movement, and were conducted using accepted protocols at the time of each survey.

Since completion of the most recent focused surveys, the Project site has not undergone physical alteration, land use conversion, or habitat modification that would reasonably be expected to change baseline biological conditions. The stability of site conditions was further confirmed during the Crotch's bumble bee habitat assessment completed in 2024. To complete the field work underlying that assessment, biologists familiar with the Project site traversed a substantial portion of the site and observed no notable changes in habitat conditions compared with those evaluated previously. Photographs attached to this memorandum as Attachment A reflect the undeveloped nature of the site and habitat characteristics observed on site during those 2024 habitat assessment efforts. Further, cattle grazing is a longstanding use of the site reflected in the Centennial EIR's existing conditions baseline, and Ranch records indicate that grazing intensity has remained consistent during the intervening years. Grazing activities on the site involve higher numbers of cattle during higher growth periods beginning in Spring and lower numbers as they are relocated to higher elevation off the project site as available grazing vegetation is diminished. These grazing methods for the site have been applied consistently throughout the past 15 years and prior. In addition, Ranch staff shared no notable change in conditions based on observations of the site during annual grazing operations and other Ranch activities on the site (Nathan Keith, Tejon Ranch, personal communication with Marc Blain, Psomas, October 19, 2026). Lastly, evidence from NOAA weather data indicating a lack of significant change in average rainfall, suggest that vegetation distribution of the region is not likely to have changed in response to weather patterns.

As such, previously documented survey results remain representative of existing site conditions. Although time has passed since the most recent focused surveys, the absence of site disturbance or habitat change together with the continuation of similar uses and activities across the site, supports the continued validity of prior survey results and impact assessment determinations, and no additional analysis or focused surveys are warranted at this time.

To further document the continued applicability of prior survey efforts, the table of biological surveys conducted on the Project site between 1999 and 2024 (Table 1) was reviewed and updated as part of this memorandum. A new column titled 2026 Evaluation has been added to Table 1 to summarize the current relevance of each prior focused survey by taxonomic group. This column provides a brief justification explaining why the existing survey data remain representative of current site conditions and why additional focused surveys are not warranted at this time. The evaluation considers factors such as habitat stability, lack of physical disturbance, and absence of land use or environmental changes since the surveys were conducted. The evaluation in this updated table demonstrates that sufficient information exists to demonstrate that baseline biological conditions have not changed significantly in the last 15 years.

TABLE 1
2026 EVALUATION OF BIOLOGICAL SURVEYS CONDUCTED ON THE PROJECT SITE

Taxonomic Group	Surveyor	Survey Dates/ Season	Methods	2026 Evaluation
Plants	BonTerra Psomas	March 23–April 5; May 25–June 5, 2015	Focused special status plant surveys throughout the impact area during the spring and summer (BonTerra Psomas 2015b).	Multi-year focused special-status plant surveys were previously conducted on the Project site. In addition, the Project site has been the subject of multi-year intensive native grassland studies and detailed vegetation mapping efforts, which further documented plant community composition, species distribution, and habitat conditions across the site. The Project site has remained undeveloped and unchanged since completion of these surveys, with no grading, vegetation removal, or alteration to soils or hydrology that would affect plant community composition or species presence. Because special-status plant occurrences are primarily driven by habitat characteristics and disturbance history, both of which remain unchanged, the prior survey results continue to accurately characterize plant resources on the site. Accordingly, additional focused plant surveys are not warranted. The western Joshua tree (*Yucca brevifolia*) was advanced to candidate status under the California Endangered Species Act in 2020. However, no western Joshua trees were documented within the survey area, as reflected in the plant compendium provided in Appendix 5.7-A.Rev of the Final EIR. Accordingly, the change in status does not affect the conclusions of the plant
		August 4, 2015	Vegetation mapping of the newly incorporated portion of the Project site (east of 300th St W).	
	BonTerra Consulting	January–March 2009	Supplemental oak tree surveys south of SR-138 (BonTerra Consulting 2009a).	
		March 2007	Vegetation mapping of the off-site impact areas (results provided in this document).	
		August–September 2005	Vegetation mapping of areas west of the Aqueduct and the 262-acre portion south of SR-138 (results provided in this document).	
	Natural Resource Consultants	April–August 2008	Special status plant surveys in the Project site and off-site mitigation areas (NRC 2008a).	
		spring 2008	Grassland composition studies on the Project site and in off-site mitigation areas (NRC 2008b).	
		spring 2007	Second year of grassland sampling of Project site (NRC 2007c).	
		spring 2007	Regional grassland distribution assessment (NRC 2007a).	
		April–June 2006	Grassland sampling study on the Project site (NRC 2006a, 2007b).	
		April–June 2006	Special status plant survey of previously mapped populations (NRC 2006b).	
	Tree Life Concern	June 2006–February 2007	Oak tree survey updated based on new impact area (Tree Life Concern 2008).	
		July 2001–November 2001	Survey of all oak trees measuring 8 inches or greater in dbh, inside of or within 200 feet of identified Project grading boundary (Tree Life Concern 2003).	

TABLE 1
2026 EVALUATION OF BIOLOGICAL SURVEYS CONDUCTED ON THE PROJECT SITE

Taxonomic Group	Surveyor	Survey Dates/ Season	Methods	2026 Evaluation
	Vollmar Consulting	April 1–11, June 23–27, 2003; April 15–24, June 10–13, 2004	Focused plant surveys throughout the site for special status species during the spring and summer (Vollmar Consulting 2004, revised 2006).	resource analysis in the Final EIR.
	Impact Sciences	March 2001–September 2001	Surveys for common and special status plant species concurrently with wildlife surveys and during the wetland and streambed delineation throughout many portions of the site (Impact Sciences 2002a, 2003).	
	Paul Pruett & Associates	March 23, 27, April 3, June 15, 1999; April 25, 29, May 18, 2000	Focused plant surveys for special status species throughout the site (Impact Sciences 2003).	
Jurisdictional Waters and Wetlands	BonTerra Psomas	June 2015	Updated jurisdictional delineation and functional assessment/CRAM including new areas (BonTerra Psomas 2015a)	Jurisdictional waters and wetland features within the Project site were previously delineated using standard methodologies and regulatory guidance applicable at the time of survey. The site has not experienced hydrologic modification, grading, or land use changes that would alter drainage patterns or aquatic feature extent. As a result, the location, extent, and character of jurisdictional waters are expected to remain unchanged. Previously completed delineations remain valid for purposes of environmental analysis, and additional field verification is not warranted.
	Glenn Lukos Associates	2008	Updated functional assessment of jurisdictional features (GLA 2009a).	
		2008	Updated jurisdictional delineation assessment and report (GLA 2009b).	
		May 2006–July 2006	Jurisdictional delineation of Phase One unimpacted areas and Future Phase areas; functional assessment of jurisdictional features (GLA 2006c).	
		October 2005–November 2005	Jurisdictional delineation of Phase One areas (GLA 2005c).	
	Impact Sciences	April 2001–August 2001	Preliminary jurisdictional delineation of Project site using USACE/CDFG delineation protocols (Impact Sciences 2002b).	

TABLE 1
2026 EVALUATION OF BIOLOGICAL SURVEYS CONDUCTED ON THE PROJECT SITE

Taxonomic Group	Surveyor	Survey Dates/ Season	Methods	2026 Evaluation
Invertebrates	Glenn Lukos Associates	September 2006–January 2007	Dry-season protocol surveys for listed fairy shrimp species in 8 seasonal depressions (GLA 2007).	Focused and reconnaissance-level surveys for invertebrates were previously conducted where suitable habitat was present. These efforts included multi-year wet- and dry-season surveys for listed fairy shrimp species, as well as focused surveys for special-status butterfly species, conducted in accordance with applicable protocols and during appropriate seasonal conditions. Invertebrate occurrence is strongly dependent on the presence of suitable host plants, soils, hydrologic conditions, and microhabitat features, all of which remain unchanged on the Project site. The site has not experienced grading, hydrologic alteration, or vegetation modification since completion of these surveys. Accordingly, prior listed fairy shrimp and special status butterfly survey results remain representative of existing conditions, and additional focused surveys are not warranted.
		October 2005–April 2006	Wet- and dry-season protocol surveys for listed fairy shrimp species in potentially suitable locations in the impact area west of the Aqueduct and the 262-acre portion south of SR-138 (GLA 2006a, 2006d).	
		October 2005	Habitat assessment surveys for listed fairy shrimp species throughout the proposed impact area west of the Aqueduct and the 262-acre portion south of SR-138 (GLA 2005b).	
		2004/2005 Wet Season	Wet-season protocol surveys for listed fairy shrimp species at 2 locations (GLA 2005a).	
	Guy Bruyea	May 2004–September 2004	Same goals and emphasis as the 2001 surveys (see below), but a larger geographic area was surveyed (Bruyea Biological Consulting 2004).	
		May 2003–August 2003 (5 days)	Same goals and emphasis as the 2001 surveys (see below), but a larger geographic area was surveyed (Bruyea Biological Consulting 2003).	
		May 2001–August 2001 (5 days)	Surveys within potentially suitable areas of the site for special status butterfly species and adult and larval host plants potentially occurring on or near the site (Bruyea Biological Consulting 2001).	
	Impact Sciences	March 2001	Non-protocol surveys for fairy shrimp at select locations. Under a USFWS permit, sampled several areas of potentially suitable habitat (i.e., vernal or seasonal pools and cattle ponds). Collected specimens with hand nets and identified them using a hand lens. Specimens were sent to Mr. Brent Helm, a fairy shrimp expert, for species confirmation (Impact Sciences 2001c).	

TABLE 1
2026 EVALUATION OF BIOLOGICAL SURVEYS CONDUCTED ON THE PROJECT SITE

Taxonomic Group	Surveyor	Survey Dates/ Season	Methods	2026 Evaluation
	Psomas	August 2024	Habitat assessment survey for Crotch's bumble bee on project site.[1]	2024 habitat assessment reflects existing conditions. The Project site has remained undeveloped and unchanged since completion of the assessment. Additional surveys are not required.
Herpetofauna	BonTerra Consulting	February 2006 – June 2006	Focused protocol surveys for arroyo toad, red-legged frog, and Tehachapi slender salamander in areas west of the Aqueduct and the 262-acre portion south of SR-138 (results provided in this document).	Focused surveys and habitat assessments for amphibians and reptiles were previously conducted based on habitat suitability and species-specific requirements. These efforts included focused protocol surveys for arroyo toad, California red-legged frog, Tehachapi slender salamander, western spadefoot, and other special-status amphibian and reptile species, as well as targeted surveys for two-striped garter snake and western pond turtle, where suitable habitat was present. No changes to aquatic features, upland habitat, or cover resources have occurred since those surveys were completed. Given the absence of new breeding habitat, hydrologic modification, or increased disturbance, conditions for herpetofauna remain consistent with those evaluated previously. Therefore, existing survey data are considered sufficient to assess potential impacts to amphibians and reptiles, and repeated surveys are not required. In addition, western spadefoot was conservatively considered during prior analyses based on generalized habitat
		Spring and Summer 2005	Focused surveys for western spadefoot in potentially suitable areas west of the Aqueduct and the 262-acre portion south of SR-138 (BonTerra Consulting 2005).	
	Impact Sciences	June 2004	Surveys for western spadefoot in potentially suitable areas of the site (Impact Sciences 2004b).	
		June 2–6, June 30–July 3, July 7–12, 2003	Surveys and specific searches for special status amphibian and reptile species in potentially suitable areas of the site (Impact Sciences 2003).	
		March 23, April 12, 23, 30, May 12, August 2001	Surveys and specific searches for special status amphibian and reptile species. USFWS protocol-level surveys for California red-legged frog. Surveys for two-striped garter snake and western pond turtle were conducted concurrent with frog surveys in potentially suitable areas of the site (Impact Sciences 2001a).	
		May 27, 2000	General biological surveys for amphibians and reptiles conducted simultaneously with more focused survey efforts in potentially suitable areas of the site (Impact Sciences 2003).	

[1] See RPDEIR, Appendix C.

TABLE 1
2026 EVALUATION OF BIOLOGICAL SURVEYS CONDUCTED ON THE PROJECT SITE

Taxonomic Group	Surveyor	Survey Dates/ Season	Methods	2026 Evaluation
	Paul Pruett & Associates	March 23, 27, April 3, 15, 20, 1999; April 21–29, May 1, 3, 13 2000	General biological surveys that included amphibian and reptile surveys in potentially suitable areas of the site (Impact Sciences 2003).	associations. Subsequent review of current species distribution and range information indicates that the Project site is outside the species' known extant geographic range (Jennings and Hayes 1994; Stebbins and McGinnis 2012; USFWS 2026a). Western spadefoot is generally associated with grasslands, vernal pool complexes, and foothill habitats of the Central Valley and coastal and inland regions of southern California, with no documented occurrences in the Project region (CDFW 2026b). This refined understanding reflects a precautionary approach taken during earlier evaluations and does not change the conclusions of the biological analysis. Accordingly, western spadefoot is not expected to occur on the Project site, and focused surveys for this species are not warranted.
Birds and Mammals	BonTerra Psomas	July 2015	Update to the 2009 California condor assessment (BonTerra Psomas 2015d)	Focused surveys and habitat assessments for mammals and listed bird species were previously completed based on habitat suitability, site reconnaissance, and species-specific survey requirements. These efforts included protocol surveys for Tehachapi pocket mouse and multi-year small mammal trapping surveys, as well as focused surveys for listed and special status bird species where suitable habitat was present. The Project site has remained in an undisturbed condition since completion of these surveys, with no changes to vegetation cover, soil conditions, forage availability,
		March–July 2015	Focused surveys for tricolored blackbird (BonTerra Psomas 2015c)	
		March – July 2013	Focused surveys for Swainson's hawk (BonTerra Psomas 2013)	
	BonTerra Consulting	February–April 2010	Focused surveys for mountain plover (BonTerra Consulting 2010).	
		April 2008–July 2008	Focused protocol surveys for least Bell's vireo and southwestern willow flycatcher (BonTerra Consulting 2008).	
		April 2006–July 2006	Focused protocol surveys for least Bell's vireo and southwestern willow flycatcher (BonTerra Consulting 2006b).	

TABLE 1
2026 EVALUATION OF BIOLOGICAL SURVEYS CONDUCTED ON THE PROJECT SITE

Taxonomic Group	Surveyor	Survey Dates/ Season	Methods	2026 Evaluation
		March 2006–July 2006	Focused protocol surveys for California spotted owl (BonTerra Consulting 2006a).	or landscape connectivity. Because the presence and distribution of mammals and listed bird species are closely tied to habitat continuity and disturbance history, the absence of site modification supports reliance on existing survey data. Therefore, additional focused surveys for special status mammals and bird species are not warranted.
	Peter Bloom	spring–summer 2007	California condor records review, habitat assessment, and impact assessment (Peter Bloom 2009).	
	Natural Resource Consultants	April 2006	Burrowing owl surveys in select areas of the Project site and mitigation lands (NRC 2006c).	
	Ecological Sciences	May 2006–July 2006	Focused surveys for Tehachapi pocket mouse in the Phase One areas (Ecological Sciences 2006).	
		2005	Small mammal trapping survey conducted at the Centennial site (Ecological Sciences 2005).	
	Impact Sciences	June 2–6, June 30–July 3, July 7–12, 2003	Surveys for special status bird species; focused burrowing owl surveys conducted in potentially suitable areas of the site (Impact Sciences 2003).	
		October 2–5 and 9–12, 2001	Small mammal species were trapped with Sherman live traps in potentially suitable sample areas representative of all habitat types on the site (Impact Sciences 2003).	
		March 2001–October 2001	Special status bird and mammal species were noted during general reconnaissance and focused surveys for plants, amphibians, and reptiles (Impact Sciences 2003).	
	Dave Crawford	June 3–7, 2003	Small mammal species were trapped with Sherman live traps in sample habitat areas primarily located east of the Aqueduct (Crawford 2003).	
	Paul Pruett & Associates	March 23, 27, April 3, June 15, 1999; April 25, 29, May 18, 2000	Wildlife surveys conducted concurrent with plant surveys in potentially suitable areas of the site (Impact Sciences 2003).	

TABLE 1
2026 EVALUATION OF BIOLOGICAL SURVEYS CONDUCTED ON THE PROJECT SITE

Taxonomic Group	Surveyor	Survey Dates/ Season	Methods	2026 Evaluation
Wildlife Movement	BonTerra Consulting	Spring 2007	Wildlife movement assessment of on-site areas to update baseline data and expected movement areas (results provided in this document).	Wildlife movement and habitat connectivity were previously evaluated based on site context, surrounding land uses, and the presence of natural movement pathways, with a focus on wide-ranging species such as mountain lion. Since completion of the prior wildlife movement studies, the Project site has not experienced development, fencing, or other physical changes that would alter movement pathways or connectivity functions. Based on analysis of the potential for wildlife movement through the Project site, the conclusions of the Final EIR remain valid, and additional wildlife movement studies are not warranted.
		2005	Review of previous studies and analysis of topographic maps and aerial photographs of the vicinity (results provided in this document).	
	Trust for Public Lands	2004–2005	Review of Tejon Ranch lands to develop a proposed 100,000 acre preserve (TPL 2004).	
	Pioneer Environmental Services	2004	Wildlife movement study of Tejon Ranch lands including the Project site (Pioneer Environmental Services 2004).	
	Dr. Paul Beier	2002	Tejon Ranch landscape connectivity study, including the Project site (Beier 2003).	
	Impact Sciences	September and October 2001	Regional habitat connectivity assessment conducted with use of aerial photographs, topographic maps, and field reconnaissance. Track surveys in riparian zones (Impact Sciences 2001b).	

SR: State Route; dbh: diameter at breast height; CRAM: California Rapid Assessment Method; USACE: U.S. Army Corps of Engineers; USFWS: U.S. Fish and Wildlife Service

Sources: The survey reports listed in this table are included in Appendix 5.7-B of the Draft EIR.

SUMMARY

This evaluation considered the Project's biological-survey record, current habitat conditions, current scientific literature, and changes in species' regulatory status to determine whether additional focused surveys were needed to characterize baseline biological resources.

The Project site remains undeveloped, and available records and recent field observations indicate that habitat conditions remain generally consistent with those evaluated in the Centennial EIR. During the August 30, 2024, Crotch's bumble bee habitat assessment, biologists familiar with the Project site traversed a substantial portion of the site and observed no notable changes in habitat conditions compared with those evaluated previously. Available information does not indicate material grading, vegetation removal, changes in land use, or alterations to soils or hydrology since completion of the biological surveys. CAL FIRE fire-history records also indicate that no major wildfires have affected the Project site since completion of

those surveys (CAL FIRE 2026). Cattle grazing is a longstanding use incorporated into the Centennial EIR's description and evaluation of existing conditions (Draft EIR, pp. 5.7-10 and 5.7-14), and Ranch records indicate that grazing intensity has remained consistent during the intervening years.

The combined survey record, current habitat conditions, and updated information reviewed in this memorandum support continued use of the existing biological surveys and habitat assessments. Additional focused surveys for baseline data collection are not warranted. Updated consideration of Crotch's bumble bee and associated mitigation is addressed separately in the RPDEIR. Preconstruction surveys, monitoring, and other species-specific requirements established by the Project's mitigation measures will address conditions present at the time of Project implementation.

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ATTACHMENT A

SITE PHOTOGRAPHS

From 2024 Crotch's Bumble Bee Habitat Assessment Report



Photo 1. View of the southeastern portion of the project site, facing southeast.



Photo 2. View of the central portion of the site, facing west.

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Site Photographs

Attachment A-1

Centennial Specific Plan Project

PSOMAS

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Photo 3. View of the eastern portion of the site, facing north.



Photo 4. View of the central portion of the site, facing northwest.

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Site Photographs

Attachment A-2

Centennial Specific Plan Project

PSOMAS

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Appendix C

Public Review RPDEIR Comment Letters

CALIFORNIA HIGHWAY PATROL
28648 The Old Road, Valencia, CA 91355 | 661-600-1600
800-735-2929 (TT/TDD)
800-735-2922 (Voice)
CALIFORNIA STATE TRANSPORTATION AGENCY
GAVIN NEWSOM, GOVERNOR

June 24, 2026

File No.: 540.17527

Jodie Sackett
LA County Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

RE: SCH #2024031142

Dear Ms. Sackett:

The California Highway Patrol, Newhall Area, received the "Notice of Completion" for a Draft Environmental Impact Report, Centennial Specific Plan Project, State Clearing House (SCH) number 2024031142. After review, we have some concerns with the increased traffic congestion that will result with the proposed increase in residents, business park, commercial traffic, and major utility facilities.

The Department's concerns with the potential impact of this project include the following: increased traffic congestion, additional enforcement demands, and increased incidents requiring emergency response during construction. Commercial truck trailer combination vehicle traffic on local freeways will increase as materials and products are transported to and from the worksite.

A.1-1

This project could have a negative impact on our operations due to the increased traffic congestion, which would necessitate the need for additional traffic control measures to mitigate the potential increase in traffic crashes. We are hopeful work project operators will diligently establish, monitor, and enforce work project rules related to vehicle safety as CHP personnel work to ensure compliance with the California Vehicle Code provisions.

If you have any questions regarding these concerns, please contact Sergeant Brian Dombrowski at (661) 600-1600.

A.1-2

Sincerely,

B. PURVIS, Captain
Commander
Newhall Area

cc: State Clearing House
Special Projects Section

Docusign Envelope ID: 47EA1DCE-11EE-8FFF-8150-D49FCF2E9A8C

NOTE: Authority cited: Section 12899.9, Water Code. Reference: Sections 12899.5(b), 12899.5(c), 12899.5(e), 12899.5(g) and 12899.8, Water Code.

HISTORY

I. New section filed 4-22-2015; operative 7-1-2015 (Register 2015, No. 17).

§ 625.4. Imminent Threat Situations Notification and Removal of Unauthorized Encroachments.

(a) The Department may immediately remove from the State Water Project any right-of-way encroachment that meets both of the following criteria:

(1) Not later than five (5) days from the date on which a notice is given pursuant to subdivision (b), Section 12899.5 of the Water Code, the own- er, occupant, or person(s) in possession of the encroachment has not asserted a right to be in possession consistent with Section 12899.8 of the Water Code and has not removed, or commenced to remove in a diligent manner, the encroachment.

(2) The encroachment poses an imminent threat to the integrity of the State Water Project.

(b) If the Department removes any encroachment upon the failure of the owner to comply with the notice pursuant to subdivision (d), Section 12899.5 of the Water Code, the Department may recover the expense of the removal, costs and expenses of suit, including attorneys fees, and, in addition, the sum of One Thousand Dollars ($1,000.00) for each day the encroachment remains after the expiration of the applicable response period described in subdivision (d), Section 12899.5 of the Water Code.

NOTE: Authority cited: Section 12899.9, Water Code. Reference: Sections 12899.5(b), 12899.5(d), 12899.5(e), 12899.5(f), 12899.5(g) and 12899.8, Water Code.

HISTORY

1. New section filed 4-22-2015; operative 7-1-2015 (Register 2015, No. 17).

§ 625.5. Emergency Situations Notification and Removal of Unauthorized Encroachment.

(a) In the case of an emergency, the Department has the authority to take any action necessary to avert, alleviate repair, or mitigate any threat to the State Water Project. An emergency, pursuant to subdivision (e), Section 12899.5 of the Water Code, is defined as a sudden, unexpected occurrence that in the opinion of the Department poses a clear and imminent danger, requiring immediate action to prevent or mitigate the loss of impairment of life, health, property, or essential public services.

(b) If the Department removes any encroachment pursuant to subdivision (e), Section 12899.5 of the Water Code, the Department may recover the expense of removal, together with the costs nd expenses, including attorneys fees, incurred in that action.

NOTE: Authority cited: Sections 128 and 12899.9, Water Code. Reference: Sections 12899.5(e), 12899.5(f), 12899.7 and 12899.8, Water Code.

HISTORY

I. New section filed 4-22-2015; operative 7-1-2015 (Register 2015, No. 17).

§ 625.6. Diversion, Drainage, Seepage, or Overflow of Water onto Departmental Right-of-Way.

(a) It is unlawful for any person to do any of the acts described in subdivision (a), Section 12899.6 of the Water Code.

(b) If a notice is given by the Department, in the manner provided in subdivision (b), Section 12899.6 of the Water Code, to any person(s) permitting a condition to exist, as described in subdivision (a), Section 12899.6 of the Water Code, the person(s) shall immediately cease and discontinue the diversion of waters or shall discontinue and prevent the drainage, seepage, or overflow and shall repair, or pay for the repair, of any damage to the State Water Project or the Department's right-of-way. The person(s) to whom the notice is provided may challenge, in a court of competent jurisdiction, the propriety of the determination by the Department.

(c) If any person(s) is notified pursuant to subdivision (b), Section 12899.6 of the Water Code and fails, neglects, or refuses to cease and discontinue the diversion, drainage, seepage, or overflow of the waters or to make or pay for the repairs, the Department may make repairs and perform work as it deems necessary to prevent the further damage to the Department's right-of-way or the State Water Project resulting from the diversion, overflow, or seepage of the waters.

(d) The Department may recover in an action at law, in any court of competent jurisdiction, the amount expended for those repairs and work, and in addition, the sum of One Thousand Dollars ($1,000) for each day the drainage, diversion, overflow, or seepage of the waters is permitted to continue, after the service of the notice in the manner specified as subdivision (b), Section 12899.6 of the Water Code, together with the costs and expenses, including attorneys fees, ir1curred in the action.

NOTE: Authority cited: Section 12899.9, Water Code. Reference: Section 12899.6, Water Code.

HISTORY

I. New section filed 4-22-2015; operative 7-1-2015 (Register 2015, No. 17).

§ 625.7. Criminal Prosecution of Unauthorized Encroachers.

If any unauthorized encroachment remains after the expiration of the response period specified in the notice of unauthorized encroachment, and the unauthorized encroachment falls under subdivision (f), Section 12899.1 of the Water Code, a copy of the notice of unauthorized encroachment and the demand for immediate removal or abatement along with any inspection reports or documentation may be sent to the local law enforcement agency for criminal prosecution of the misdemeanor.

NOTE: Authority cited: Section 12899.9, Water Code. Reference: Section 12899.l(f), Water Code.

HISTORY

I. New section filed 4-22-2015; operative 7-1-2015 (Register 2015, No. 17).

Article 10. General Encroachment Permit for Operations and Maintenance by Public Agencies

§ 635.0. Routine Operations and Maintenance of Facilities by Public Agency Water Contractors.

(a) The Department, not later than sixty (60) days from the date on which it receives a complete application, shall issue a general encroachment permit, for a period not to exceed ten (10) years, for routine operation and maintenance activities of public agencies with a contract with the Department for delivery of water pursuant to subdivision (b), Section 12937 of the Water Code.

(b) For the purposes of this section, "operation and maintenance" means inspection, equipment testing and maintenance, water quality monitoring and testing, weed and pest abatement, and other similar activities consistent with existing agreements between the Department and its water contractors.

NOTE: Authority cited: Section 12899.9, Water Code. Reference: Sections 12937 and 12899.11, Water Code.

HISTORY

I. New article 10 (section 635.0) and section filed 4-22-2015; operative 7-1-2015 (Register 2015, No. 17).

* * *

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Comment Letter A.2

STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY

GAVIN NEWSOM, *Governor*

DEPARTMENT OF WATER RESOURCES
P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791

July 7, 2026

Jodie Sackett
Senior Planner
LA County Department of Regional Planning
320 W Temple Street
Los Angeles, CA 90012

SCH2024031142 CEQA, Review of Centennial Specific Plan Project, RPDEIR

Dear Jodie Sackett,

The Department of Water Resources (DWR) Division of Operations and Maintenance Right-of-Way Management (ROWM) Section has reviewed the RPDEIR for the Centennial Specific Plan Project and appreciates the opportunity to provide the following comments. A.2-1

Proposed Project Description
The project proposes a master-planned community on a 12,323-acre site consisting of 19,333 residential units. Supporting development includes approximately 7.36 million square feet of business park uses, 1.03 million square feet of commercial uses, 1.57 million square feet of institutional/civic facilities, recreation and entertainment uses, utility facilities, and K–12 schools. Approximately 5,624 acres (45.6 percent) of the project site would be preserved as open space for natural resource protection, greenways, parks, and recreational use.

The project also includes an integrated transportation network of roadways, sidewalks, and approximately 73 miles of walking and biking trails connecting residential, commercial, employment, and community facilities. Additional improvements include renewable energy microgrid electrical distribution systems to support the project's Net Zero greenhouse gas (GHG) program and the dedication of most of the Cement Road Realignment as a public road to improve fire resiliency. The Specific Plan would be amended to allow renewable energy microgrids as a permitted land use throughout the project area, although no specific microgrid facilities are proposed at this time. A.2-2

Surrounding Land Uses and Setting
The site of the proposed development is directly adjacent to and proposes crossing the State Water Project's (SWP) California Aqueduct. DWR has statutory rights to protect the California Aqueduct from property development of the proposed parcels because of DWR's facilities in the vicinity of the project area.

Off-Site Aqueduct Crossings
The Project would require four crossings of the California Aqueduct, including the pipeline crossing of the East Branch of the Aqueduct:

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- Crossing 1 would involve an expansion to the existing National Cement Plant Road bridge crossing. Water and recycled water pipelines would be attached to the bridge structure or would cross beneath the Aqueduct.
- Crossing 2 would involve construction of a new bridge crossing. Water and recycled water pipelines would be attached to the bridge structure or would cross beneath the Aqueduct.
- Crossing 3 would involve a trenched at-grade crossing of the Aqueduct south of the Oso Water Treatment Plant. Since the Aqueduct is underground at this location, water pipeline extensions from the Water Treatment Plant to the portions of the Project site, located to the east of the Aqueduct, would require trenching.
- Crossing 4 would involve the attachment of a wellhead water pipeline to or beneath the existing 300th Street West bridge crossing of the East Branch immediately north of the Project site.

A.2-2 Cont.

Hydrology and Water Quality

The 2018 Centennial Specific Plan described a drainage strategy that incorporates natural stormwater management features and a proposal for multipurpose greenway basins to filter urban runoff and promote groundwater recharge from excess stormwater generated by increased impervious surfaces. We acknowledge that the FEIR responses addressed DWR's concerns regarding potential impacts to the West Branch of the State Water Project. However, a detailed drainage study is still necessary to evaluate the project's potential impacts. The Proposed project may divert the drainage runoff downstream into the Aqueduct, which would may result in impacts to SWP right of way. Any potential impacts to SWP facilities would need to be considered and mitigated to prevent negatively impacting the SWP right of way per 23 CCR § 625.6 (See Attachment 1). Please provide a hydrology analysis for this project assessing the impacts to surface runoff (if any) to DWR right of way. The study should assess the pre-and-post development peak stormwater runoff rates and the impacts (if any) to DWR right of way.

A.2-3

Permit Requirements

Based on our review, DWR has determined that the proposed project **will require Encroachment Permits**. An Encroachment Permit (EP) or other permission from DWR will be required pursuant to 23 CCR § 605 for activities that may pose a threat to the physical integrity of any facility of the State Water Project or that could interfere with the Department's rights with regard to access, inspection, repair or the operation and maintenance of any State Water Project facility, including, but not limited to the following:

A.2-4

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- If any portion of the project encroaches into, requires construction access through, or impacts the existing drainage within (including developed runoff discharging into) DWR's right-of-way; or

- The project involves proposed modifications to the existing soil or other cover over State Water Project pipelines.

A.2-4 Cont.

Information regarding encroachment permits can be found at:

https://www.water.ca.gov/Work-With-Us/Real-Estate/Encroachment-Permits

Please contact the Department at **swp.encroachments@water.ca.gov to initiate the encroachment permit process.** Early coordination with DWR is strongly encouraged, as it will provide the project proponent with the most effective project guidance and help ensure timely project review.

For questions concerning this letter please reach out to Zack Ramsey via email at Zachary.Ramsey@water.ca.gov or via telephone by (916) 820-8161.

A.2-5

Sincerely,

Zachary Ramsey

Zack Ramsey, Manager
State Water Project Right-of-Way Management Section
Division of Operations and Maintenance

Attachment:
1. EP Regulations

CALIFORNIA HIGHWAY PATROL
28648 The Old Road, Valencia, CA 91355 | 661-600-1600
800-735-2929 (TT/TDD)
800-735-2922 (Voice)
CALIFORNIA STATE TRANSPORTATION AGENCY
GAVIN NEWSOM, GOVERNOR

July 24, 2026

File No.: 540.17527

Jodie Sackett
LA County Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

RE: SCH #2024031142

Dear Ms. Sackett,

The California Highway Patrol, Newhall Area, received the "Notice of Completion" for a Draft Environmental Impact Report, Centennial Specific Plan Project, State Clearing House (SCH) number 2024031142. After review, we have some concerns with the increased traffic congestion that will result with the proposed increase in residents, business park, commercial traffic, and major utility facilities.

The Department's concerns with the potential impact of this project include the following: increased traffic congestion, additional enforcement demands, and increased incidents requiring emergency response during construction. Commercial truck trailer combination vehicle traffic on local freeways will increase as materials and products are transported to and from the worksite.

A.3-1

This project could have a negative impact on our operations due to the increased traffic congestion, which would necessitate the need for additional traffic control measures to mitigate the potential increase in traffic crashes. We are hopeful work project operators will diligently establish, monitor, and enforce work project rules related to vehicle safety as CHP personnel work to ensure compliance with the California Vehicle Code provisions.

If you have any questions regarding these concerns, please contact Sergeant Brian Dombrowski at (661) 600-1600.

A.3-2

Sincerely,

B. Pi

B. PURVIS, Captain
Commander
Newhall Area

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STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

South Coast Region
3883 Ruffin Road
San Diego, CA 92123
wildlife.ca.gov

August 7, 2026

Jodie Sackett
County of Los Angeles Department of Regional Planning
Subdivisions Section
320 West Temple Street
Los Angeles, CA 90012
subdivisions@planning.lacounty.gov

Subject: Recirculated Partial Draft Environmental Impact Report for the Centennial Specific Plan Project, SCH No. 2024031142, Los Angeles County, CA

Dear Jodie Sackett:

The California Department of Fish and Wildlife (CDFW) reviewed the Recirculated Partial Draft Environmental Impact Report (RPDEIR) from Los Angeles County (County) for the Centennial Specific Plan Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

A.4-1

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

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CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: Centennial Founders LLC

Objective: The Project involves the development of a master planned community with 19,333 residential units. Other land uses include approximately 7,363,818 square feet (sf) of Business Park uses on approximately 597 gross acres; and approximately 1,034,550 sf of Commercial uses on approximately 102 acres. Proposed Institutional/Civic land uses encompass approximately 1,568,160 sf on approximately 110 acres. A.4-1 Cont.

The primary purpose of this Recirculated Partial Draft EIR is to revise portions of the Centennial EIR to address the deficiencies identified by the Court of Appeal in the Opinion so as to ensure that the Centennial EIR evaluates the potential environmental effects of the Project in compliance with CEQA (Public Resources Code Sections 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3). This Recirculated Partial Draft EIR is intended to inform decision makers and the public regarding the Project's potential to result in significant environmental impacts related to Climate Change, Wildfire, and Biological Resources (Crotch's bumble bee), to identify feasible mitigation measures that may minimize such impacts, and to facilitate informed agency decisions regarding the Project.

Location: The 12,323-acre Project site is located in the northwestern portion of Antelope Valley in unincorporated Los Angeles County and is contiguous with the southern boundary of Kern County.

Biological Setting: The Project site is characterized by moderate to steep hills and canyons with oak woodlands and riparian areas west of the West Branch of the California Aqueduct, and by open, gently sloping mesa grasslands dissected by a network of arroyos east of the Aqueduct. Elevations range from approximately 3,000 feet above mean sea level (msl) on the Antelope Valley floor in the northeastern portion of the site to approximately 4,350 feet above msl in the southwestern portion of the property. The Tehachapi Mountains border the

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site to the north and west, and the San Gabriel Mountains are located south of the Project site

The Project site is one of the largest remaining perennial and annual grassland habitat areas in Los Angeles County. Vegetation communities known to occur on the Project site include, but are not limited to, Wright's buckwheat scrub, mixed oak woodland, alluvial scrub, cottonwood woodland, riparian herb, rush riparian grassland, southern arroyo willow riparian, southern cottonwood-willow woodland, southern willow scrub, valley oak riparian woodland, unvegetated wash, willow riparian forest, willow riparian woodland, alkali meadow, Baltic rush, coastal and valley freshwater marsh, seeps and ephemeral ponds, native perennial grasslands, wildflower fields, and native and nonnative annual grasslands.

In the previous Draft Environmental Impact Report for the Centennial Project (DEIR; County of Los Angeles, 2017), LA County Planning identified 40 special-status invertebrate, fish, amphibian, reptile, bird, and mammal species observed or with potential habitat within the Project site. Species potentially occurring within the Project site that are listed under the Endangered Species Act (ESA) as threatened or endangered or proposed for listing under the ESA as threatened or endangered, and/or listed under the California Endangered Species Act (CESA) as threatened, endangered, or candidate species include: A.4-1 Cont.

- conservancy fairy shrimp (*Branchinecta conservatio*; ESA-listed endangered)
- vernal pool fairy shrimp (*Branchinecta lynchi*; ESA-listed threatened)
- Crotch's bumble bee (*Bombus crotchii*; CESA candidate endangered species)
- Tehachapi slender salamander (*Batrachoseps stebbinisi*; CESA-listed threatened)
- western spadefoot (*Spea hammondii*; proposed for ESA threatened listing)
- arroyo toad (*Anaxyrus californicus*; California Species of Special Concern (SSC) ESA-listed endangered)
- California red-legged frog (SSC, ESA-listed threatened)
- western pond turtle (*Emys marmorata*; SSC, proposed for ESA threatened listing)
- California condor (*Gymnogyps californianus*; CESA-listed endangered, ESAlisted endangered, State fully protected)
- Swainson's hawk (*Buteo swainsoni*; CESA-listed threatened)
- bald eagle (Haliaeetus leucocephalus; CESA-listed endangered, State fully protected)
- western yellow-billed cuckoo (*Coccyzus americanus occidentalis*; CESA-listed endangered, ESA-listed threatened)
- California spotted owl (*Strix occidentalis occidentalis*; SSC, proposed for ESA listing as endangered)
- southwestern willow flycatcher (*Empidonax trallii extimus*; CESA-listed endangered, ESA-listed endangered)
- least Bell's vireo (*Vireo bellii pusillus*; CESA-listed endangered, ESA-listed endangered)

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- tricolored blackbird (*Agelaius tricolor*; CESA-listed threatened)
- mountain lion (*Puma concolor*; CESA-listed threatened)
- western burrowing owl (*Athene cunicularia hypugaea*; CESA candidate threatened or endangered species)

The 2017 DEIR also identified 30 special-status plant species with the potential to occur within the Project site. Plants with a California Rare Plant Rank (CRPR) of 1B.2 or higher, ESA-listed threatened, and/or NPPA-listed Rare include:

- round-leaved filaree (California macrophylla; CRPR 1B.2)
- slender mariposa lily (Calochortus clavatus var. gracilis; CRPR 1B.2)
- late-flowered mariposa lily (Calochortus fimbriatus; CRPR 1B.2)
- Palmer's mariposa lily (Calochortus palmeri var. palmeri; CRPR 1B.2)
- Mt. Gleason paintbrush (Castilleja gleasoni; NPPA-listed Rare, CRPR 1B.2)
- Lemmon's jewel flower (Caulanthus lemmonii; CRPR 1B.2)
- Tehachapi buckwheat (Eriogonum callistum; CRPR 1B.1)
- Fort Tejon woolly sunflower (Eriophyllum lanatum var. hallii; CRPR 1B.1)
- Tejon poppy (Eschscholzia lemmonii ssp. kernensis; CRPR 1B.1)
- spreading navarretia (Navarretia fossalis; ESA-listed threatened, CRPR 1B.1)
- Baja navarretia (Navarretia peninsularis; CRPR 1B.2)
- Piute Mountains navarretia (Navarretia setiloba; CRPR 1B.2)
- Robbins' nemacladus (Nemacladus secundiflorus var. robbinsii; CRPR 1B.2)
- San Bernardino aster (Symphyotrichum defoliatum; CRPR 1B.2)

Lastly, critical Habitat for the California condor occurs immediately adjacent to the northern boundary of the Project site.

History: CDFW had previously provided comments on an early consultation at the request of the County. Comments included, but were not limited to, rare plants, special-status wildlife, streams and wetlands, and project description and alternatives. CDFW also provided comments for the Notice of Preparation, which included but were not limited to special-status wildlife, fire impacts, and updated biological surveys.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

A.4-1 Cont.

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COMMENT # 1: Human-Wildlife Conflict

Issue: The Project will increase human-wildlife conflicts.

Specific impact: The Project will be constructing a master planned community within and adjacent to wildlife habitat, which can increase interactions between people and wildlife.

Why impact would occur: Development adjacent to or within wildlife habitat can increase interactions between people and wildlife, resulting in property damage, public safety concerns, wildlife displacement, and increased demand for wildlife management services.

Elevated pedestrian presence is likely to create direct and indirect impacts to local wildlife species through the loss of potential habitat and encounters with wildlife. This has potential to impact sensitive wildlife species and their habitat through a variety of ways:

- loss of habitat due to erosion from footpaths
- increased noise levels
- increased trash or pet waste
- introduction of unnatural food sources via pet food, trash and trash receptacles
- introduction of unnatural water sources via pets, ponds, and pools
- introduction of invasive species from other sites
- potential for disease transmission between wildlife and domestic animals
- predation of wildlife by domestic animals

A.4-2

Evidence impact may be significant: The Project has the potential to significantly increase human-wildlife conflicts, resulting in adverse impacts to biological resources. Increased development and human activity may lead to higher wildlife mortality from vehicle collisions, unauthorized take, or wildlife removal actions undertaken in response to conflicts. The Project may also disrupt wildlife movement and habitat use by causing animals to abandon suitable habitat, alter established movement corridors, or become isolated in fragmented habitat patches. As conflicts become more frequent, wildlife may be subject to repeated capture, relocation, or, in some cases, euthanasia, which can adversely affect local wildlife populations and the ecological functions they support. These impacts may be compounded by other existing and planned developments in the surrounding area, creating cumulative effects through continued habitat fragmentation and increased human presence. In addition, the Project may necessitate ongoing wildlife management measures, such as fencing, exclusion devices, trapping, relocation, or habitat modification, each of which has

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the potential to result in additional environmental impacts. Accordingly, these reasonably foreseeable effects should be fully analyzed in the RPDEIR, and the project should include enforceable, long-term mitigation measures supported by a dedicated funding mechanism to ensure that future human-wildlife conflicts are effectively managed throughout the life of the project.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #1: Wildlife Conflict Management Plan - Prior to issuance of the first grading permit, the Project applicant shall prepare and submit a Wildlife Conflict Management Plan (WCMP) for review and approval by the Lead Agency, in consultation with the California Department of Fish and Wildlife (CDFW), as appropriate. The WCMP shall identify measures to minimize and manage human-wildlife conflicts resulting from increased development within and adjacent to wildlife habitat.

A.4-2 Cont.

At a minimum, the WCMP shall include:

- Procedures, roles and responsibilities, for responding to wildlife conflicts in a manner that prioritizes avoidance, non-lethal deterrence, and protection of wildlife and public safety.
- Protocols for evaluating and documenting wildlife conflict incidents, including species involved, location, cause, and resolution.
- Educational and outreach resources made available to inform residents and visitors on how to coexist with wildlife and prevent conflicts with wildlife.
- Measures to reduce attractants and opportunities for wildlife conflicts, including wildlife-resistant trash and food storage, secured crawl spaces, predator resistant livestock cages, fencing and exclusion measures where appropriate, public education, and maintenance requirements.
- Monitoring and adaptive management provisions to evaluate the effectiveness of mitigation measures and revise management practices as necessary.
- Identification of qualified, trained and/or licensed wildlife professionals who are authorized to respond to wildlife conflicts. Wildlife capture, handling, or relocation shall only occur when legally authorized and consistent with applicable state and federal regulations.

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Mitigation Measure #2: Long-Term Funding Mechanism - To ensure implementation of the WCMP, the Project applicant shall establish a permanent funding mechanism, such as an endowment, reserve, or other financial assurance acceptable to the Lead Agency, prior to occupancy of the first residential unit. The funding mechanism shall provide sufficient financial resources to implement the WCMP, including monitoring, public education, conflict response, retention of licensed wildlife professionals, and adaptive management in perpetuity. The funding amount shall be periodically reviewed and adjusted, as necessary, to ensure adequate resources remain available to address project-related human-wildlife conflicts, without reliance on public agency funding.

A.4-2 Cont.

COMMENT # 2: Updated Special Status Species Surveys

Issue: The Project will impact special status species or their habitat.

Specific impact: Implementation of the master planned community will impact special status species or their habitat.

Why impact would occur: Various biological surveys were conducted between 1999 and 2015 in support of the analysis discussed in the 2017 DEIR. Species potentially occurring within the Project site that are listed under the Endangered Species Act (ESA) as threatened or endangered or proposed for listing under the ESA as threatened or endangered, and/or listed under the California Endangered Species Act (CESA) as threatened, endangered, or candidate species include:

- conservancy fairy shrimp (*Branchinecta conservatio*; ESA-listed endangered)
- vernal pool fairy shrimp (*Branchinecta lynchi*; ESA-listed threatened)
- Crotch's bumble bee (*Bombus crotchii*; CESA candidate endangered species)
- Tehachapi slender salamander (*Batrachoseps stebbinisi*; CESA-listed threatened)
- western spadefoot (*Spea hammondii*; proposed for ESA threatened listing)
- arroyo toad (*Anaxyrus californicus*; California Species of Special Concern (SSC) ESA-listed endangered)
- California red-legged frog (SSC, ESA-listed threatened)
- western pond turtle (*Emys marmorata*; SSC, proposed for ESA threatened listing)
- California condor (*Gymnogyps californianus*; CESA-listed endangered, ESA-listed endangered, State fully protected)
- Swainson's hawk (*Buteo swainsoni*; CESA-listed threatened)
- bald eagle (Haliaeetus leucocephalus; CESA-listed endangered, State fully protected)
- western yellow-billed cuckoo (*Coccyzus americanus occidentalis*; CESA-listed endangered, ESA-listed threatened)
- California spotted owl (*Strix occidentalis occidentalis*; SSC, proposed for ESA listing as endangered)

A.4-3

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- southwestern willow flycatcher (*Empidonax trallii extimus*; CESA-listed endangered, ESA-listed endangered)
- least Bell's vireo (*Vireo bellii pusillus*; CESA-listed endangered, ESA-listed endangered)
- tricolored blackbird (*Agelaius tricolor*; CESA-listed threatened)
- mountain lion (*Puma concolor*; CESA-listed threatened)
- western burrowing owl (*Athene cunicularia hypugaea*; CESA candidate threatened or endangered species)

The 2017 DEIR also identified 30 special-status plant species with the potential to occur within the Project site. Plants with a California Rare Plant Rank (CRPR) of 1B.2 or higher, ESA-listed threatened, and/or NPPA-listed Rare include:

- round-leaved filaree (California macrophylla; CRPR 1B.2)
- slender mariposa lily (Calochortus clavatus var. gracilis; CRPR 1B.2)
- late-flowered mariposa lily (Calochortus fimbriatus; CRPR 1B.2)
- Palmer's mariposa lily (Calochortus palmeri var. palmeri; CRPR 1B.2)
- Mt. Gleason paintbrush (Castilleja gleasoni; NPPA-listed Rare, CRPR 1B.2)
- Lemmon's jewel flower (Caulanthus lemmonii; CRPR 1B.2)
- Tehachapi buckwheat (Eriogonum callistum; CRPR 1B.1)
- Fort Tejon woolly sunflower (Eriophyllum lanatum var. hallii; CRPR 1B.1)
- Tejon poppy (Eschscholzia lemmonii ssp. kernensis; CRPR 1B.1)
- spreading navarretia (Navarretia fossalis; ESA-listed threatened, CRPR 1B.1)
- Baja navarretia (Navarretia peninsularis; CRPR 1B.2)
- Piute Mountains navarretia (Navarretia setiloba; CRPR 1B.2)
- Robbins' nemacladus (Nemacladus secundiflorus var. robbinsii; CRPR 1B.2)
- San Bernardino aster (Symphyotrichum defoliatum; CRPR 1B.2)

A.4-3 Cont.

Generally, CDFW considers two years to be the life span of surveys for most sensitive species. Relying on outdated surveys may result in missed detection of special status species. Additionally, if the Project proceeds without appropriate special status species focused surveys, the Project may result in mortality and/or injury of undetected individuals that may be present during Project activities. It is also possible that special status species may utilize the proposed Project site as foraging habitat. Project may result in habitat loss or lead to potential take of special status species.

Evidence impact may be significant: Species designated as candidate for listing as threatened or endangered pursuant to CESA (Fish & G. Code, § 2050 *et seq*.). Take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Additionally, take of special status species and their habitat is

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defined by Fish and Game Code section 86 and prohibited by sections 3503, 3503.5, and 3513. Take is defined in Fish and Game Code section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill." Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative 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 CDFW.

A.4-3 Cont.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #3: Special Status Species Surveys – The Project proponent shall retain a qualified biologist to conduct updated focused surveys for special status species that have the potential to occur on the Project site. Focused surveys shall be conducted pursuant to CDFW's most recent survey and monitoring protocol guidance.

Mitigation Measure #4: Incidental Take Permit - If there is potential for take of a special status species, the Project proponent shall coordinate with CDFW and obtain appropriate take authorization (pursuant to Fish & Game Code, § 2080 et seq). The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to the lead agency prior to implementing Project ground-disturbing activities.

ADDITIONAL COMMENTS

Long-term Management of Mitigation Lands. For proposed mitigation lands, the DEIR should include measures to protect the targeted habitat values in perpetuity. The mitigation should offset Project-induced qualitative and quantitative losses of biological resources. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate endowment should be set aside to provide for long-term management of mitigation lands.

A.4-4

Translocation/Salvage of Plants and Animal Species. Translocation and transplantation are the processes of removing plants and wildlife from one location and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to endangered,

A.4-5

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rare, or threatened plants and animals. These efforts are experimental, and the outcome is unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving plants and animals and their habitats. A.4-5 Cont.

Scientific Collecting Permit. A Scientific Collecting Permit would be necessary if there is a plan to capture and relocate wildlife. Pursuant to the California Code of Regulations, title 14, section 650, qualified biologist(s) must obtain appropriate handling permits to capture, temporarily possess, and relocated wildlife to avoid harm or mortality in connection with Project-related activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). A Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). For more information, please see CDFW's Scientific Collecting Permit webpage[1]. A.4-6

Wetland Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's (Commission) policies[2]. Through its Wetlands Resources policy, the Commission "…seek[s] to provide for the protection, preservation, restoration, enhancement, and expansion of wetland habitat in California" (California Fish and Game Commission, 2005). It is the policy of the Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values." A.4-7

a. The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of

[1] Scientific Collecting Permits
[2] Miscellaneous Policies

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wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, a project should include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions benefiting local and transient wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the Project's environmental document and these measures should compensate for the loss of function and value. A.4-7 Cont.

Water policy. The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this State; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650). A.4-8

Use of Native Plants and Trees. CDFW recommends the City require the Project Applicant to provide a native plant palette for the Project. The Project's landscaping plan should be disclosed and evaluated in the DEIR for potential impacts on biological resources such as natural communities adjacent to the Project site (e.g., introducing non-native, invasive species). CDFW supports the use of native plants for the Project especially considering the Project's location adjacent to protected open space and natural areas. CDFW strongly recommends avoiding non-native, invasive species for landscaping and restoration, particularly any species listed as 'Moderate', High', Limited', and 'Watch' by the California A.4-9

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Invasive Plant Council[3] CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project site. In addition, CDFW supports planting native species of trees, such as oaks (Quercus genus), and understory vegetation (e.g., ground cover, vines, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying tree (snags) where possible because snags provide perching and nesting habitat for birds and raptors. Finally, CDFW supports planting species of vegetation with high insect and pollinator value. A.4-9 Cont.

Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The Lead Agency is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A). A.4-10

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to CNDDB. The CNDDB website provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms. A.4-11

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the Combined Rapid Assessment and Relevé Form[4].

[3] https://www.cal-ipc.org/plants/inventory/
[4] Natural Communities — Submitting Information

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The County should ensure data collected for the preparation of the Project's environmental document is properly submitted. A.4-11 Cont.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.) A.4-12

CONCLUSION

CDFW appreciates the opportunity to comment on the RPDEIR to assist the County in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the County has to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)). A.4-13

Questions regarding this letter or further coordination should be directed to Andrew Aitken[5], Environmental Scientist.

Sincerely,

DocuSigned by:
5991E19EF8094C3...
Victoria Tang
Environmental Program Manager
South Coast Region

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

ec: California Department of Fish and Wildlife

[5] Email: Andrew.Aitken@wildlife.ca.gov

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Victoria Tang, Environmental Program Manager
Steve Gibson, Senior Environmental Scientist (Supervisory)
Andrew Aitken, Environmental Scientist
Cindy Hailey, Staff Services Analyst

REFERENCES

California Fish and Game Commission. 2005. *Miscellaneous Policies*. Retrieved from https://fgc.ca.gov/About/Policies/Miscellaneous

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STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

South Coast Region
3883 Ruffin Road
San Diego, CA 92123
wildlife.ca.gov

Attachment A. Mitigation Monitoring and Reporting Program (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

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Biological Resources (BIO)		
Mitigation Measure (MM) Description	**Implementation Schedule**	**Responsible Party**
Mitigation Measure #1: Wildlife Conflict Management Plan - Prior to issuance of the first grading permit, the Project applicant shall prepare and submit a Wildlife Conflict Management Plan (WCMP) for review and approval by the Lead Agency, in consultation with the California Department of Fish and Wildlife (CDFW), as appropriate. The WCMP shall identify measures to minimize and manage human-wildlife conflicts resulting from increased development within and adjacent to wildlife habitat. At a minimum, the WCMP shall include: • Procedures, roles and responsibilities, for responding to wildlife conflicts in a manner that prioritizes avoidance, non-lethal deterrence, and protection of wildlife and public safety. • Protocols for evaluating and documenting wildlife conflict incidents, including species involved, location, cause, and resolution. • Educational and outreach resources made available to inform residents and visitors on how to coexist with wildlife and prevent conflicts with wildlife. • Measures to reduce attractants and opportunities for wildlife conflicts, including wildlife-resistant trash and food storage, secured crawl spaces, predator resistant livestock cages, fencing and exclusion measures where appropriate, public education, and maintenance requirements. • Monitoring and adaptive management provisions to evaluate the effectiveness of mitigation measures and revise management practices as necessary. Identification of qualified, trained and/or licensed wildlife professionals who are authorized to respond to wildlife conflicts. Wildlife capture, handling, or relocation shall only occur when legally authorized and consistent with applicable state and federal regulations.	Prior to Project Initiation	Project Proponent

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Mitigation Measure #2: Long-Term Funding Mechanism - To ensure implementation of the WCMP, the Project applicant shall establish a permanent funding mechanism, such as an endowment, reserve, or other financial assurance acceptable to the Lead Agency, prior to occupancy of the first residential unit. The funding mechanism shall provide sufficient financial resources to implement the WCMP, including monitoring, public education, conflict response, retention of licensed wildlife professionals, and adaptive management in perpetuity. The funding amount shall be periodically reviewed and adjusted, as necessary, to ensure adequate resources remain available to address project-related human-wildlife conflicts, without reliance on public agency funding.	Prior to Project Initiation	Project Proponent
Mitigation Measure #3: Special Status Species Surveys – The Project proponent shall retain a qualified biologist to conduct updated focused surveys for special status species that have the potential to occur on the Project site. Focused surveys shall be conducted pursuant to CDFW's most recent survey and monitoring protocol guidance.	Prior to Project Initiation	Project Proponent
Mitigation Measure #4: Incidental Take Permit - If there is potential for take of a special status species, the Project proponent shall coordinate with CDFW and obtain appropriate take authorization (pursuant to Fish & Game Code, § 2080 et seq). The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to the lead agency prior to implementing Project ground-disturbing activities.	Prior to Project Initiation	Project Proponent
Long-term Management of Mitigation Lands. For proposed mitigation lands, the DEIR should include measures to protect the targeted habitat values in perpetuity. The mitigation should offset Project-induced qualitative and quantitative losses of biological resources. Issues that should be addressed	Prior to Project Initiation	Project Proponent

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include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate endowment should be set aside to provide for long-term management of mitigation lands.		
Translocation/Salvage of Plants and Animal Species. Translocation and transplantation are the processes of removing plants and wildlife from one location and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to endangered, rare, or threatened plants and animals. These efforts are experimental, and the outcome is unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving plants and animals and their habitats.	During Project Construction	Project Proponent
Scientific Collecting Permit. A Scientific Collecting Permit would be necessary if there is a plan to capture and relocate wildlife. Pursuant to the California Code of Regulations, title 14, section 650, qualified biologist(s) must obtain appropriate handling permits to capture, temporarily possess, and relocated wildlife to avoid harm or mortality in connection with Project-related activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). A Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in	Prior to Project Initiation	Project Proponent

Docusign Envelope ID: E3B47E29-1EFA-829D-807B-4532BBC26882

connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). For more information, please see CDFW's Scientific Collecting Permit webpage[6].		
Wetland Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's (Commission) policies[7]. Through its Wetlands Resources policy, the Commission "…seek[s] to provide for the protection, preservation, restoration, enhancement, and expansion of wetland habitat in California" (California Fish and Game Commission, 2005). It is the policy of the Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values." b. The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, a project should include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland	Prior to Project Initiation	Project Proponent

[6] Scientific Collecting Permits
[7] Miscellaneous Policies

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resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions benefiting local and transient wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the Project's environmental document and these measures should compensate for the loss of function and value.		
Water policy. The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this State; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).	Prior to Project Initiation	Project Proponent
Use of Native Plants and Trees. CDFW recommends the City require the Project Applicant to provide a native plant palette for the Project. The Project's landscaping plan should be disclosed and evaluated in the DEIR for potential impacts on biological resources such as natural communities adjacent to the Project site (e.g., introducing non-native, invasive species). CDFW supports the use of native plants for the Project especially considering the Project's location	Prior to Project Initiation	Project Proponent

Docusign Envelope ID: E3B47E29-1EFA-829D-807B-4532BBC26882

adjacent to protected open space and natural areas. CDFW strongly recommends avoiding non-native, invasive species for landscaping and restoration, particularly any species listed as 'Moderate', High', Limited', and 'Watch' by the California Invasive Plant Council[8] CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project site. In addition, CDFW supports planting native species of trees, such as oaks (Quercus genus), and understory vegetation (e.g., ground cover, vines, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying tree (snags) where possible because snags provide perching and nesting habitat for birds and raptors. Finally, CDFW supports planting species of vegetation with high insect and pollinator value.		

[8] https://www.cal-ipc.org/plants/inventory/

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CALIFORNIA HIGHWAY PATROL
1033 Lebec Road, Lebec, CA 93243 | 661-248-6655
800-735-2929 (TT/TDD)
800-735-2922 (Voice)
CALIFORNIA STATE TRANSPORTATION AGENCY
GAVIN NEWSOM, GOVERNOR

August 10, 2026

File No.: 430.19515/26-51

Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012
Attention: Mr. Jodie Sackett

RE: SCH#2024031142

Dear Mr. Sackett:

The California Highway Patrol (CHP) Fort Tejon Area recently received a "Notice of Completion" environmental impact document for the proposed Centennial Project, State Cleaning House (SCH) #2024031142. After a thorough review, several concerns were identified.

The proposed site development would include nearly 20,000 residential units, commercial and industrial development, and institutional/civic facilities. Specifically, this project will have a negative impact on our operations due to increased traffic congestion, increased response times, additional enforcement demands, increased emergency services and service calls into the CHP Bakersfield Area Communications Center. Commercial truck trailer combination vehicle traffic on local freeways will increase as materials and products are transported to and from the worksite.

A.5-1

There would be additional concern for public safety, and delayed responses for emergency incidents within the CHP Fort Tejon Area's geographical area of responsibility in unincorporated Kern and Los Angeles Counties. We are hopeful work project operators will diligently establish, monitor, and enforce work project rules related to vehicle safety as CHP personnel work to ensure compliance with the provisions of the California Vehicle Code.

If you have any questions regarding these concerns, please contact me directly at (661) 248-6655.

A.5-2

Sincerely,

Rudy Alcaraz

R. E. ALCARAZ, Lieutenant
Commander
Fort Tejon Area

LOZEAU DRURY LLP

T 510.836.4200
F 510.836.4205

1939 Harrison Street, Ste. 150
Oakland, CA 94612

www.lozeaudrury.com
richard@lozeaudrury.com

VIA EMAIL

July 1, 2026

Jodie Sackett, Senior Planner
Los Angeles County Regional Planning Department
320 West Temple Street, 13th Floor
Los Angeles, CA 90012
jsackett@planning.lacounty.gov

Re: Comment on the Recirculated Partial Draft Environmental Impact Report for the Centennial Specific Plan Project (SCH No. 2024031142)

Dear Ms. Sackett:

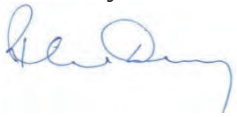
This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the Recirculated Partial Draft Environmental Impact Report ("RPDEIR") prepared for the Centennial Specific Plan Project (SCH No. 2024031142) ("Project"). The Project involves the development of a specific plan consisting of 19,333 residential units, approximately 7,363,818 square feet of business park uses, approximately 1,034,550 square feet of commercial uses, 130,680 square feet of recreational and entertainment uses, public utilities, K-12 schools, open space, vehicular and non-vehicular circulation systems, roadways, biking, walking, and hiking trails, as well as the permitting of microgrid electrical distribution systems as an allowed land use, located at the cross streets of State Route 138 and Gorman Post Roads in the unincorporated Gorman community in the County of Los Angeles.

B.1-1

SAFER is concerned that the RPDEIR fails as an informational document and does not impose all feasible mitigation measures to reduce the Project's impacts. SAFER requests that the Regional Planning Department address these shortcomings by revising and recirculating the RPDEIR before approval of the Project.

SAFER reserves the right to supplement these comments during the administrative process. (*Galante Vineyards v. Monterey Peninsula Water Management Dist*. (1997) 60 Cal.App.4th 1109, 1121.)

Sincerely,



Richard Drury
Lozeau Drury LLP

From: Jodie Sackett <jsackett@planning.lacounty.gov>
Sent: Monday, July 6, 2026 10:19 AM
To: Nathan Keith <nkeith@tejonranch.com>; Jessica Hitchcock <jessica.hitchcock@psomas.com>
Cc: Jennifer Marks <jennifer.marks@psomas.com>; Joshua Huntington <jhuntington@planning.lacounty.gov>
Subject: Fw: Centennial Project RPDEIR comment period

FYI

JODIE SACKETT

SENIOR PLANNER, Subdivisions

All official correspondence is issued solely from *[Name]@planning.lacounty.gov* and

donotreply@lacounty.gov email addresses. Communications from other domains are not affiliated with our organization and should not be treated as an official communication. Please also note that the County will never request funds via wire transfer.

From: Jodie Sackett <jsackett@planning.lacounty.gov>
Sent: Monday, July 6, 2026 10:17 AM
To: Salston@biologicaldiversity.org <Salston@biologicaldiversity.org>
Subject: Fw: Centennial Project RPDEIR comment period

Greetings,

Yes, the public comment period for the Centennial RPDEIR has been extended, consistent with the recirculation of the document. The Centennial Specific Plan page (https://planning.lacounty.gov/long-range-planning/centennial-specific-plan/) is available for easy access to certain documents, but going forward you should reference our official CEQA noticing webpage here:

https://planning.lacounty.gov/environmental-review/public-notice/

To avoid confusion, we will also add the updated NOA to the Centennial page.

Regards,

JODIE SACKETT

SENIOR PLANNER, Subdivisions

All official correspondence is issued solely from *[Name]@planning.lacounty.gov* and

donotreply@lacounty.gov email addresses. Communications from other domains are not affiliated with our organization and should not be treated as an official communication. Please also note that the County will never request funds via wire transfer.

From: Seth Alston <Salston@biologicaldiversity.org>
Sent: Thursday, July 2, 2026 1:23 PM
To: DRP Info <info@planning.lacounty.gov>
Subject: Centennial Project RPDEIR comment period

CAUTION: External Email. Proceed Responsibly.

Hello,

Can you please confirm that the public comment period for the Centennial RPDEIR has been extended, consistent with the recirculation of that document? If so, can you please confirm the new deadline for public comment regarding the Project.

The NOA included on the County Planning website appears out of date, compared to the NOA available via the State Clearinghouse.

B.2-1

Thank you,

Seth Alston (he/him)

Associate Attorney

Center for Biological Diversity

Urban Wildlands Program


CENTER for
BIOLOGICAL
DIVERSITY

SOUTHERN CALIFORNIA EDISON
An *EDISON INTERNATIONAL* Company

Sent via electronic mail to jsackett@planning.lacounty.gov

July 7, 2026

Jodie Sackett, Senior Planner
Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012

RE: Centennial Specific Plan Project – Recirculated Partial Draft EIR Comments

Dear Ms. Sackett,

Southern California Edison (SCE) is pleased to submit the following comments on the Recirculated Partial Draft Environmental Impact Report for the Centennial Specific Plan Project. B.3-1

SCE's Electrical Facilities
SCE provides electric service to the County of Los Angeles, maintains electrical transmission and distribution facilities, as well as substations and supporting appurtenances in the County of Los Angeles.

General Order 131-D
The construction, modification, and relocation of transmission lines, or electrical facilities that are designed to operate at or above 50 kilovolts (kV) may be subject to the California Public Utilities Commission's (CPUC) General Order 131-D[1]. If the construction, modification, or relocation of transmission lines results in significant environmental impacts, they should be identified and discussed in the Recirculated Partial Draft Environmental Impact Report for the Centennial Specific Plan Project. If not, SCE may be required to pursue a separate, mandatory CEQA review through the CPUC, which could delay approval of the SCE transmission line portion of the project for two years or longer.

Permit to Construct (PTC) & Certificate of Public Convenience and Necessity (CPCN)
In addition, please note that SCE is subject to California Public Utilities Commission General Order 131-D (GO 131-D). Electric facilities between 50kV and 200kV are subject to the CPUC's Permit to Construct (PTC) review. For facilities subject to PTC review, or for over 200kV electric facilities subject to Certificate of Public Convenience and Necessity (CPCN) requirements, the CPUC reviews utility PTC or CPCN applications pursuant to CEQA and serves as Lead Agency under CEQA B.3-2

SCE appreciates the opportunity to comment on the Centennial Specific Plan Project. SCE looks forward to working and collaborating with the County of Los Angeles. If you have any questions regarding this letter, please contact me at stevi.luevano@sce.com. B.3-3

Regards,

Stevi N Luevano
Third Party Environmental Reviews
Major Projects Division, EHSQ
Southern California Edison
2244 Walnut Grove
Rosemead CA 91770

[1] http://docs.cpuc.ca.gov/PUBLISHED/Graphics/589.PD

August 13, 2026

Sent via email

Jodie Sackett
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LA County Department of Regional Planning
320 W Temple Street
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jsackett@planning.lacounty.gov

Re: Centennial Specific Plan Project Recirculated Partial Draft Environmental Impact Report
SCH #2024031142

Dear Jodie Sackett:

These comments are submitted on behalf of the Center for Biological Diversity (Center) and the California Native Plant Society (CNPS) regarding the Centennial Specific Plan Project Recirculated Partial Draft Environmental Impact Report (RPDEIR) SCH #2024031142. As you are aware, the Center and CNPS successfully challenged this Project in 2019. As a result of that lawsuit, the Court ordered Los Angeles County (County) to set aside its approval of the Project and decertify the previously approved Centennial Environmental Impact Report. This RPDEIR revises parts of the biological resources, wildfire, and greenhouse gas analyses in the County's next attempt to circulate a legally compliant environmental impact report.

The Center and CNPS have reviewed the RPDEIR closely and are concerned about the Project's impacts to sensitive and special-status species and habitat, including species protected under the California Endangered Species Act (CESA) like Crotch's bumblebee, mountain lion, burrowing owl, and western spadefoot; sensitive and special-status plants; and the newly proposed expansion of the San Andreas Significant Ecological. The Center and CNPS are also concerned that the RPDEIR's wildfire risk and greenhouse gas emissions impact analyses and mitigation remain deficient under the California Environmental Quality Act (CEQA). The RPDEIR sections are still not adequate, and the sections that the County did not revise are seven years old and now must be updated to account for significant new information. In addition to what is discussed in detail below, the RPDEIR should provide additional updates that include but are not limited to a section on potential impacts to "dry utilities," particularly electric power in light of significant changes in estimated statewide power demand due to data centers in operation, under construction, and proposed since the DEIR was circulated in 2017; a section on water resources in light of new information on reduced California snowpack, on climate models predicting the reduced availability of State Water Project water available to serve the Project, reduced availability of Colorado River water, increased water demand for data centers, and increased water demand due to higher temperatures in service areas; and a section on climate change in light of new information on climate change and climate modeling. The County must revise and recirculate a complete EIR that fully analyzes and mitigates the Project's impacts.

B.4-1

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.8 million members and online activists throughout California and the United States. The Center and its members have worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Southern California.

The California Native Plant Society (CNPS) is a non-profit environmental organization with over 10,000 members. CNPS' mission is to protect California's native plant heritage and preserve it for future generations through application of science, research, education, and conservation. CNPS works closely with decision-makers, scientists, and local planners to advocate for well-informed and environmentally friendly policies, regulations, and land management practices.

B.4-2

I. The RPDEIR Fails to Adequately Assess and Mitigate the Project's Impacts to Biological Resources

A. The RPDEIR Fails to Adequately Analyze, Avoid, Minimize, and Mitigate Impacts to Crotch's Bumble Bee and its Habitat.

Bumble bees are integral members of native ecosystems, not only due to their pollination services but for their roles in the food web, nutrient cycling and decomposition, and pest control (R. G. Hatfield & Jepsen, 2021). They pollinate countless native plants as well as many crops, playing an important role in both ecosystem health and agriculture (Cameron et al., 2011). Unfortunately, numerous bumble bees have experienced significant declines in recent decades due to multiple factors including novel pathogens, habitat loss, and pesticides (Cameron et al., 2011; Colla et al., 2012; Goulson et al., 2015).

Crotch's bumble bee is one such species. Their populations have plummeted over the last few decades, largely due to habitat loss and modification, among other factors. Once widespread across the Central Vally and much of southern California, Crotch's bumble bee is now rare, and primarily restricted to xeric and coastal sites in southwestern California, like the proposed Project site (K. Fisher et al., 2022; R. Hatfield et al., 2018). The species (along with three other bumble bees) was granted "candidate" status under CESA in 2022. As such, it is of utmost importance that any impacts to this species be fully avoided or mitigated to prevent further decline and extirpation.

B.4-3

Yet the RPDEIR fails to adequately analyze or mitigate impacts to Crotch's bumble bee. In fact, the RPDEIR does not establish a baseline of environmental conditions regarding the presence of Crotch's bumble bee although it recognizes that the 2003 Sensitive Insect Survey Report for the project (Bruyea Biological Consulting) that Crotch's bumble bee was documented to be "one of the most abundant bee species on the Project site". While no recent surveys have been performed on the Project site since 2003, consistent documentation of Crotch's bumble bees at Quail lake in 2022, 2023 and 2026 (Exhibit A) indicating that the species, while declining is still present in the area. Quail Lake is publicly accessible and directly adjacent to the western part of the Proposed Project.

Under CEQA, an environmental review document must evaluate the potential environmental impacts of the project as compared to the existing environmental conditions (the "baseline"), so that the Project's impacts can be meaningfully analyzed and compared to alternatives. (CEQA Guidelines § 15125(a); see *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 952; *Neighbors for Smart Rail v. LA County Metropolitan Transit Authority* (2013) 57 Cal.4th 310, 315.)

Contemporary, updated, robust surveys for Crotch's bumble bee, as outlined in CDFW's *Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species* (CDFW, 2023) should have been performed and used as the basis for avoidance, minimization and if necessary mitigation in the RPDEIR. The RPDEIR cannot simply mitigate the whole Project area impacts to Crotch's bumble bee without first justifying why avoidance and minimization of impacts is impossible.

The RPDEIR states "Impacts to Crotch's bumble bee would be considered significant." (RPDEIR at 2.1-4). The RPDEIR recognizes the whole of the Project site to be Crotch's bumblebee habitat, and relies solely on mitigation to try to offset the impact. Instead the RPDEIR should have included avoidance and minimization of impacts to the habitat instead of defaulting to inadequate mitigation (see below).

B.4-3 Cont.

The RPDEIR not only fails to avoid and minimize impacts to Crotch's bumble bee and its habitat, it also fails to provide adequate mitigation for Project impacts as proposed. The RPDEIR basically relies on land that was *already* set aside to mitigate for other Project impacts and determines that no additional mitigation is necessary (RPDEIR at 2.1-4). The RPDEIR provides no justification for this reasoning. Land that was earmarked for preservation for other project impacts does not necessarily minimize or mitigate impacts to individual Crotch's bees, the resident population, or current habitat in the Project area. It is unclear where the Preserve System (RPDEIR at 2.1-4) is actually located (i.e. no map of the Preserve Area or Crotch's bumble bee habitat). The Preserve System appears to be proposed as mitigation for other impacts not related to Crotch's bumble bee. Without the necessary evidence, including data that the Preserve System areas support Crotch's bumble bee, this mitigation is insufficient. The proposed Project will still result in take of individual bumble bees and destruction of suitable habitat, which should first be analyzed for avoidance, minimization and if necessary mitigation.

Additionally, the RPDEIR fails to address the disruption of connectivity between remaining habitat patches east and west of the proposed Project for Crotch's bumble bee. Habitat connectivity is vital for wildlife movement and biodiversity conservation. Limiting movement and dispersal by creating barriers (e.g., development, roads) negatively affects animals' behavior, movement patterns, reproductive success, and physiological state, resulting in significant impacts on individual wildlife, populations, communities, and landscapes.(Ahrné et al., 2009; Aizen & Feinsinger, 2003; Goulson et al., 2015; Goverde et al., 2002; Pioltelli et al., 2024). Individuals can die off, populations can become isolated, sensitive species can become locally extinct (local extirpation), and important ecological processes like plant pollination and nutrient cycling can be lost. In addition, connectivity between high quality habitat areas in heterogeneous landscapes is important to allow for range shifts and species migrations as climate changes (Cushman et al., 2013; Heller & Zavaleta, 2009). If the proposed Project is constructed, the remaining Crotch's

bumble bee in the surrounding area would no longer be able to move between remaining habitat patches around the Project, and the populations would become isolated in smaller patches adjacent to the Project site. These isolated populations would also experience additional edge effects from the proposed development and would be less resilient to changes in local or regional climate or environmental disturbances like wildfire. The impact to Crotch's bee habitat connectivity was not considered, analyzed, or mitigated in the RPDEIR, a significant deficiency.

B.4-3 Cont.

The RPDEIR thus fails to adequately analyze and mitigate direct impacts to Crotch's bumble bee and suitable habitat, in violation of CEQA.

B. Significant New Information Requires the County to Revise and Recirculate the Biological Resources Section of the 2019 EIR.

CEQA makes plain that significant new information on a project prior to EIR certification requires revision and recirculation for public review. (Pub. Res. Code § 21092.1; CEQA Guidelines § 15088.5(a).) CEQA specifically provides that a supplemental EIR is required when "[n]ew information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available." (Pub. Res. Code § 21166(c).) CEQA defines significant new information as information showing: (1) "[a] new significant environmental impact would result from the project . . ."; or (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." (CEQA Guidelines § 15088.5(a).) Additionally, CEQA requires a revised EIR when "substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report." (Pub. Res. Code § 21166(b).)

B.4-4

In the years since the EIR was certified in 2019, significant new information has emerged regarding significant ecological areas (SEAs) and special-status species, including mountain lion, gray wolf, western burrowing owl, and western spadefoot in the Project area. In addition, significant new information regarding wildfire risk and mitigation provided in the Climate Resolve Settlement, including large areas of vegetation removal, thinning, and maintenance, has been provided by the Project Proponent. Such actions will have significant impacts on sensitive and special-status species and habitats, but they have not been thoroughly analyzed or mitigated. The County must take into account significant new information on the Project impacts and revise and recirculate the EIR before certification. (CEQA Guidelines § 15088.5(a).)

i. There is significant new information regarding Significant Ecological Areas and Special-status Plants within the Project Area.

Since the prior EIR was certified in 2019, a new study regarding the County's significant ecological areas (SEAs) has been published indicating that the Project area has high ecological value and has among the highest rare plant species richness in the County. In May 2026, the County of Los Angeles Department of Regional Planning released the 2025 Significant Ecological Areas Study (Cooper et al., 2026). The study "integrates updated information regarding threatened, endangered, rare, and uncommon species, sensitive habitats, landscape-scale connectivity, climate-driven ecosystem change, and other factors that influence long-term ecological function and resilience" with the goal of evaluating the effectiveness of existing SEA

B.4-5

boundaries meeting the goals and policies contained in the County's General Plan (Cooper et al., 2026). Researchers provide recommendations and adjustments to the SEA boundaries and descriptions to help ensure that the SEA framework "remains scientifically robust, ecologically resilient, and responsive to evolving environmental conditions, while remaining applicable to land use planning and policy in unincorporated Los Angeles County" (Cooper et al., 2026).

The researchers propose expanding the San Andreas SEA to include Subarea 17c, which includes a much greater portion of the Project area to "incorporate large, ecologically intact landscapes associated with the San Andreas Rift Zone and adjacent desert – montane transition areas" (Figure 1, Cooper et al., 2026). Subarea 17c would "more fully include the flatter portions of the open grassland and wildflower field habitats protected within the Antelope Valley California Poppy State Reserve" and "include extensive, undisturbed habitats of the southern Tehachapi Mountains" (Cooper et al., 2026). In addition, Subarea 17C also "contains several areas of high rare plant species richness, among the highest in the county, and supports regular flyovers by California condors (Cooper et al., 2026).

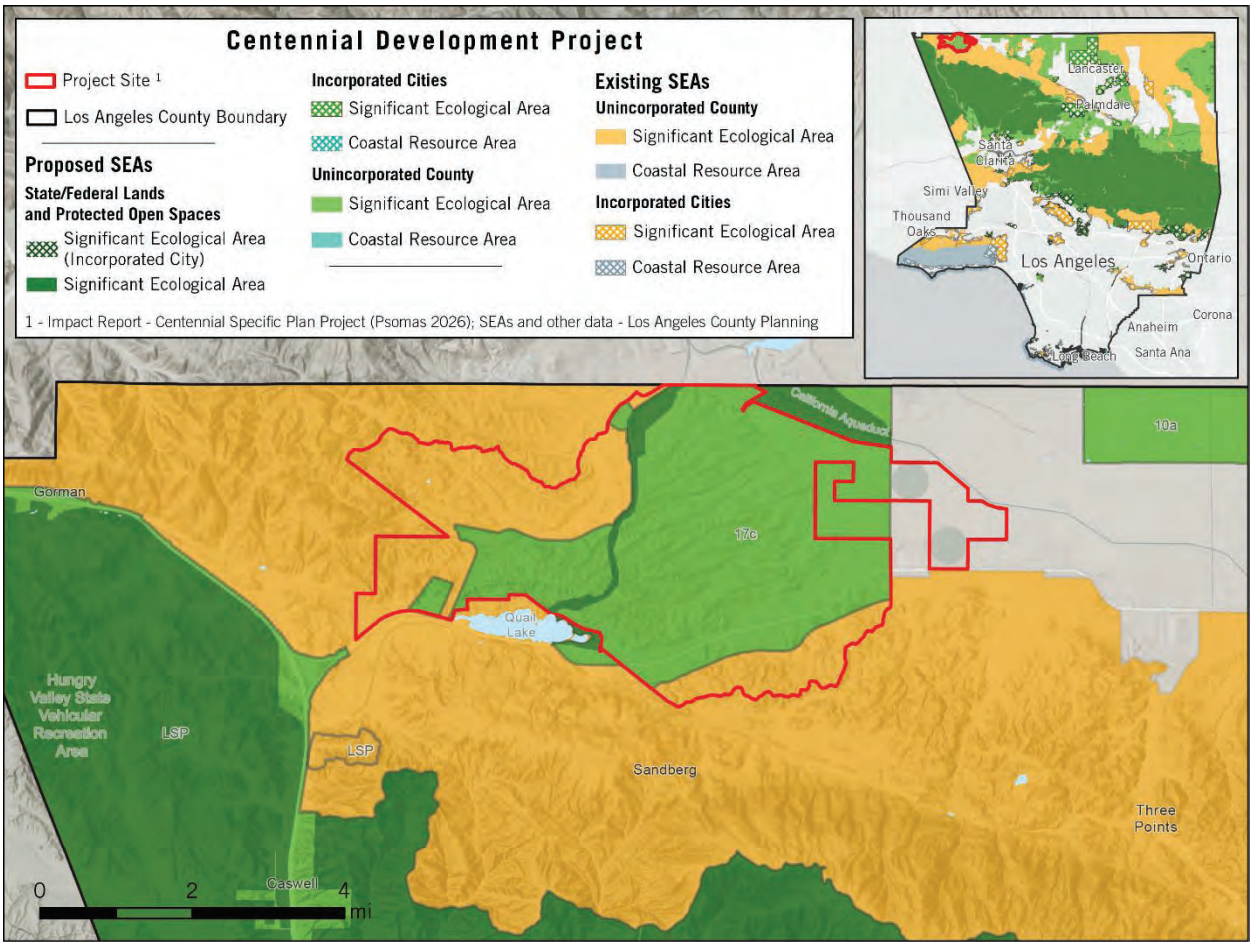


Figure 1. Proposed SEA expansion in and near the Centennial Project footprint.

B.4-5 Cont.

Currently, designated SEAs must satisfy one of six criteria (Criterion A through Criterion F, below). The new study recommends a seventh criterion (Criterion G).

- Criterion A: The habitat of core populations of endangered or threatened plant or animal species.
- Criterion B: On a regional basis, biotic communities, vegetative associations, and habitat of plant or animal species that are either unique or are restricted in distribution.
- Criterion C: Within the County, biotic communities, vegetative associations, and habitat of plant or animal species that are either unique or are restricted in distribution.
- Criterion D: Habitat that at some point in the life cycle of a species or group of species, serves as concentrated breeding, feeding, resting, or migrating grounds and is limited in availability either regionally or in the County.
- Criterion E: Biotic resources that are of scientific interest because they are either an extreme in physical/geographic limitations or represent unusual variation in a population or community.
- Criterion F: Areas that would provide for the preservation of relatively undisturbed examples of the original natural biotic communities in the County.
- Criterion G (Recommended): Areas that provide functionally important habitat connectivity between or within designated SEAs, including relatively intact or lightly disturbed habitat that forms functional linkages or corridors connecting portions of the same SEA or linking one SEA to another.

B.4-5
Cont.

The proposed SEA expansion in and near the Project area meets all seven criteria, as follows (Exhibit B):

- **Criterion A:** An exceptional diversity of special-status species is found within the San Andreas SEA, including pond turtle (*Actinemys* sp.; species-level identification uncertain in the contact zone between *A. marmorata* and *A. pallida*) in small montane wet meadows (sag ponds), burrowing owl, Swainson's hawk, California condor, Joshua tree woodland (throughout), tricolored blackbird (throughout), vernal pool fairy shrimp, and numerous sensitive plant taxa (e.g., *Astragalus leucolobus*, *Calochortus palmeri* var. *palmeri*, *Navarretia setiloba*).
- **Criterion B/C:** Supports diverse and often declining plant and wildlife assemblages, including rare grassland birds, uncommon herpetofauna and mammals, an exceptional diversity of locally rare plants, and high-value riparian wildlife communities with strong restoration potential.
- **Criterion D:** Constructed wetlands and riparian areas provide critical habitat in an otherwise arid landscape, acting as focal resources for wildlife.
- **Criterion E:** Represents the western edge of Joshua tree woodland (clonal form), extensive sandy wash systems with scattered riparian elements (including large cottonwoods), rare riparian woodlands in arid settings, and one of the most significant remaining native grassland systems in Los Angeles County.
- **Criterion F:** Encompasses large, remote, and largely undeveloped landscapes with little recent human disturbance, supporting wide-ranging species and intact ecological processes.

- **Criterion G:** With the recommended adjustments, this SEA will better function as a major regional connectivity hub, facilitating wildlife movement between the Antelope Valley, San Gabriel Mountains, and Tehachapi Mountains, including crossings over the California Aqueduct and Interstate 5. The area can also accommodate climate-driven range shifts and lateral movement across desert, grassland, and montane habitats.

The previously approved EIR states that the Biological Resource Assessment "does not reference any studies that demonstrate that the Project site serves a significant element of the regional landscape linkage" (DEIR at 5.7-57). However, the 2026 SEA study provides significant new information that the Project area is indeed a critical area for regional connectivity, biodiversity, and climate resilience. CEQA requires new Project impact analyses to current and proposed SEAs within the Project area.

B.4-5 Cont.

ii. There is Significant New Information Regarding the Spread of Invasive Plant Species and the Potential for Changed Conditions.

The RPDEIR claims that the "[c]onditions of the Project site related to biological resources have not changed since the Draft EIR was previously circulated for public review," yet the RPDEIR offers no evidence to substantiate the claim that conditions are unchanged. Botanical surveys of the project site have not occurred since 2015, and there is a significant probability that site conditions have changed since this time. Changing climate, existing ongoing land uses, and fire adjacent to the project area all have the potential to alter the conditions of biological resources on the Project site.

Since the site was last surveyed in 2015, California has seen the spread of invasive species not previously known to many areas of the state. Stinkwort (*Dittrichia graveolens*) and stinknet (*Oncosiphon pilulifer)* have spread aggressively since previous surveys occurred and are now known to occur in areas near the proposed development site (Brinkmann, 2020; Hedrick & McDonald, 2020; Melen et al., 2024). These species pose a risk to special-status plant species, threaten critical habitat for protected animal species, and increase wildfire risk through the creation of easily ignitable fuels that can quickly carry fire into adjacent areas.

B.4-6

According to Table 5.7-2 the 2015 surveys were focused on special-status species and were not protocol level floristic surveys intended to capture the full botanical diversity of the project site. The RPDEIR should not base assumptions on 11-year-old surveys. CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (Protocols) recommend additional surveys when "the physical or climatic conditions of the project area have changed since the last botanical field survey was conducted" or when "[c]hanges in vegetation or plant distribution have occurred since the last botanical field surveys were conducted, such as those related to habitat alteration, fluctuations in abundance, invasive species, seed bank dynamics, or other factors" (CDFW, 2018). Changes in invasive species abundance and distribution have occurred since previous surveys suggesting the need for additional analysis to inform both biological impacts, the impacts of fire risk, and mitigation needed to ensure that the project activities do not compound these risks. The CDFW Protocols go on to suggest that in "habitats dominated by long-lived perennial plants, such as forests, surveys that were not conducted within the previous five years may not adequately represent the current baseline conditions and should be re-conducted," recommending multiple annual surveys for

"habitats, such as grasslands or desert plant communities that have annual and short-lived perennial plants as a major floristic components" (CDFW, 2018).

The surveys conducted are not sufficient to ensure the baseline conditions of a more stable plant community, let alone the dynamic grassland plant communities found on the project site. The RPDEIR's claim that site conditions have not changed since 2015, or 2001, are unsupported and updated surveys are essential to ensuring that the analysis in sections 5.3 - Hazards, Hazardous Materials, Fire Safety, 5.5 - Land Resources (Agricultural, Forest and Mineral Resources), 5.7 - Biological Resources, and 7.0 - Cumulative Impacts are accurate. As a key component of the RPDEIR is updated analysis of wildfire risk to comply with the Writ issued by the Los Angeles County Superior Court in the Centennial Litigation, this analysis cannot be comprehensive without updated information on wildfire risk associated with the current and anticipated post-implementation extent invasive species (Baur et al., 2026; Lambert et al., 2010). B.4-6 Cont.

iii. There is Significant New Information Regarding Wildfire Risk and Mitigation.

The RPDEIR proposes new wildfire mitigation that includes removing more vegetation and habitat than what was disclosed in the previously approved EIR. The RPDEIR includes a Fire Protection Plan that will require mowed lawns and removal and thinning of native vegetation up to 200 feet from structures while recommending vegetation management in parks and open space. These actions could have significant impacts on special-status and sensitive species in and near the Project area. The RPDEIR acknowledges as much, stating:

> "vegetation management for fire abatement purposes is not permitted in the portion of Significant Ecological Area (SEA) 17 or mitigation preserve areas within or bordering the Project site and, therefore, brush clearance zones shall be contained within the current Project impact boundary and no overlap with the adjacent SEA 17 and/or mitigation preserve areas shall occur" (RPDEIR Appendix F – Fire Protection Plan [Exhibit 1] at 7).

B.4-7

Almost the entire area of the "Project impact boundary" has been identified for SEA expansion due to its important habitat that has among the highest rare plant species richness in the county, supports many grassland bird species including special-status species like Swainson's hawk, burrowing owl, and tricolored blackbird, and provides important connectivity within the Tehachapi Mountains. The proposed fire abatement that includes removal, thinning, and replacement of native vegetation in the proposed SEA expansion will have significant negative impacts on sensitive, rare, and special-status species. Such impacts should be provided in detail, including a map of where any vegetation management would occur throughout the Project area, and thoroughly analyzed and mitigated in a revised and recirculated EIR. Any vegetation management throughout the entire Project area should be developed and implemented in coordination and collaboration with CDFW. In addition, prescribed fire and cultural burns should be considered as a mitigation strategy, in coordination with Tribes, fire practitioners, and CDFW.

iv. There is Significant New Information Regarding Species Listed Under the California Endangered Species Act

Mountain lions, burrowing owls, and potentially western spadefoot (the California Fish and Game Commission will vote on August 13, 2026) have the full protection of a threatened species under CESA. (See Cal. Fish & Game Code §§ 2074.4, 2085; Cal. Code Regs. tit. 14 § 783.1(b).) "Take" of any endangered, threatened, or candidate species that results from a project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9.) Take is defined as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill," and is prohibited by sections 3503, 3503.5 and 3513.

CESA's purpose is "to conserve, protect, restore, and enhance any endangered species or any threatened species and its habitat." (Fish & Game Code § 2052.) As such, CESA protects not only species facing imminent risk of extinction, but also those on a trajectory towards eventual extinction. An "endangered" species is one that is "in serious danger of becoming extinct throughout all, or a significant portion, of its range." (*Id*. § 2062.) In contrast, a "threatened" species is one that, "although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of . . . special protection and management efforts." (*Id*. § 2067.) And "candidate" species are those noticed for review for future listing or proposed to be added as endangered or threatened species, (Cal. Fish & Game Code §§ 2068, 2074.4), while also receiving protection under CESA. (Cal. Fish & Game Code §§ 2074.4, 2085; *see also* Cal. Code Regs. tit. 14 § 783.1(b).) B.4-8

CESA requires development of "reasonable and prudent alternatives" that will not jeopardize the existence of a listed species but will maintain the project purpose to the greatest extent feasible. (Cal. Fish & Game Code § 2053(b).) In the event that such alternatives are infeasible, agencies may still approve individual projects if appropriate mitigation measures are implemented. (Cal. Fish & Game Code § 2054.)

CESA envisions these mandates will be incorporated into the CEQA process. (Cal. Fish & Game Code §§ 2064-2065; Cal. Code Regs., tit. 14, §§ 783.3 & 783.5.) CEQA requires a "mandatory finding of significance" if substantial evidence indicates that a Project may cause a "wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare or threatened species[.]" (CEQA Guidelines § 15065(a)(1).) This means that projects that reduce a listed species' habitat or reduce the number or range of a listed species are deemed to have significant impacts on the environment as a matter of law. (See *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 792 fn. 12 [citing *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1273–1274].)

There is Significant New Information Regarding Mountain Lions.

Relevant authorities require preparation of a subsequent EIR when new information comes to light after an EIR is certified. CEQA states that a subsequent or supplemental EIR may be required when either (1) substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental B.4-9

impact report or (2) new information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available. (Pub. Res. Code § 21166.)

New information since the EIR was approved in 2019 that mountain lions in the Project area are facing an extinction vortex fits within both of these categories. Mountain lions in the Project area are part of the Central Coast and Southern California distinct population segment (DPS), which includes six subpopulations of mountain lions. These mountain lions were petitioned for listing under CESA in July 2019 (Yap et al., 2019) and received candidacy status April 2020. In December 2025, CDFW released their status review and recommended the Central Coast and Southern California DPS of mountain lions be listed as threatened under CESA (CDFW, 2025). And in the February 12, 2026 planning commission hearing, the California Fish and Game Commission voted unanimously to formalized the listing, determining that "listing the DPS is warranted due to threats such as habitat loss, habitat fragmentation and isolation of small populations as a result of expanding human infrastructure, among others" (CDFW, 2026b).

These protections acknowledge the mounting scientific evidence that mountain lions in and near the Project area are at risk of spiraling towards extinction. According to former Acting Director, Valerie Termini, these mountain lions are "clearly at risk from distinct threats, habitat loss, fragmentation, roads, freeways, housing, mortality from vehicle strikes and rodenticides, and risks of isolation and inbreeding if left unmitigated" (CA Fish and Game Commission, 2026). These protections also acknowledge that we have the tools, knowledge, and the opportunity to prevent the DPS from becoming endangered or extinct. In discussing listing the DPS as threatened, Commissioner Murray poignantly pointed out that "CESA wasn't created just to protect species that are on the verge of blinking out with extinction. It's to give species a chance to bounce back before it's an absolute crisis, before it gets to that level of endangered" (CA Fish and Game Commission, 2026). Numerous scientific studies point to the need to protect existing connectivity and make existing barriers more permeable to improve gene flow and recover the DPS (e.g., Benson et al., 2019; Gustafson et al., 2022). And as Commissioner Erika Zavaleta mentioned, "measures to stabilize puma populations, to address limited connectivity among them, to reduce the pace of habitat fragmentation and loss, and to improve habitat quality are all things that will also benefit other native wildlife and ecosystems" (CA Fish and Game Commission, 2026).

B.4-9
Cont.

CEQA requires a "mandatory finding of significance" when a project has the potential to impact a CESA-listed species. (CEQA Guidelines § 15065(a)(1); *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 792 fn. 12.) And such a finding triggers a duty to consider and adopt all feasible alternatives or mitigation measures to reduce such impacts. (Pub. Res. Code § 21002.) Moreover, under CESA, the County may not approve projects that could jeopardize the continued existence of these populations or result in destruction of essential habitat (Fish & Game Code § 2053(a)) and agencies must require that appropriate mitigation measures be implemented for projects that could destroy mountain lion habitat or impair connectivity (Fish & Game Code § 2054). Although the 2019 EIR acknowledges that mountain lions may "occasionally forage within the Project site," it does not account for, nor could it have accounted for, the dire situation of local mountain lions and the

importance of the Project area for gene flow, wildlife connectivity, and the long-term survival of the Central Coast and Southern California mountain lion DPS.

By way of background, continued habitat loss and fragmentation has led to 10 genetically isolated populations within California (Gustafson et al., 2019, 2022). There are six identified mountain lion populations in the Southern California and Central Coast DPS, and several are facing an extinction vortex due to high levels of inbreeding, low genetic diversity, and high human-caused mortality rates from car strikes on roads, depredation kills, rodenticide poisoning, poaching, disease, and increased human-caused wildfires (Benson et al., 2019, 2023; Benson, Sikich, et al., 2020; Gustafson et al., 2022; Nisi et al., 2023). Alarmingly, researchers have documented physical and reproductive signs of inbreeding depression in these mountain lions (Huffmeyer et al., 2022), which could lead to local extinction in several populations of the DPS within decades (Benson et al., 2019). Maintaining and enhancing connectivity among and between the DPS populations is important to prevent extinction. In addition, the Sierra Nevada region is "a major source of genetic diversity for mountain lions in California" (CDFW, 2025). Ensuring connectivity between the DPS and the Sierra Nevadas is "of critical importance to sustaining statewide gene flow as the Tehachapi range at its southern end is the only known area where there is current gene flow from outside the [DPS]" (CDFW, 2025; Gustafson et al., 2019, 2022).

The Project area is in the exact location where statewide connectivity is vital to the long-term survival of the Central Coast and Southern California mountain lion DPS. It is within the Sierra Madre-Castaic linkage where the Tehachapi Mountains and the Sierra Pelona Mountains converge. This area has been identified as a critical area for "restoring and maintaining genetic exchange between genetic populations" in the Western Sierra Nevada population, the central coast populations (particularly the Central Coast South [CC-S] population in the Santa Monica Mountains), and the southern populations (particularly the San Gabriel/San Bernardino [SGSB] population), and CDFW emphasizes acquiring, maintaining, and enhancing connectivity areas and suitable habitat specifically in this region (CDFW, 2025).

B.4-9 Cont.

At least one mountain lion has been documented traversing the Project area since the EIR was approved in 2019. In a study that began in 2023, researchers at the UC Davis California Carnivores Program researchers documented one collared mountain lion moving through the Project area (Figure 2). M419, a dispersing young male, clearly moved through the Project area as he searched to establish his own territory. The movement of one individual mountain lion in this area is significant. One study found a single migrant improved the genetics of a small, isolated and inbred puma population in California (Gustafson et al., 2017). Therefore, any movement in and near the Project area is critical for statewide gene flow and the long-term survival of the Central Coast and Southern California mountain lion DPS. This emphasizes the importance of the Project area for maintaining and enhancing connectivity among and between the subpopulations and preserving habitat in the region. Although M419 ultimately stayed in the Western Sierras, his movement in the Project area demonstrates both the importance of the area for wildlife connectivity as well as connectivity constraints that need to be addressed. Placing additional movement barriers like a large, bright, noisy development that will put more infrastructure, people, and cars in this critical connectivity area without adequately assessing or

mitigating the Project's impacts will drive the Central Coast and Southern California DPS of mountain lions closer towards extinction.

Although the 2019 EIR acknowledges that mountain lions are "expected to occasionally forage… within the Project site" (DEIR at 5.7-50) and mountain lion tracks were documented in the Project area, the 2019 EIR concluded that "[t]he Project would not cause any regional populations of plants or animals in adjacent regions to become isolated" (DEIR at 5.7-170). However, new information that a dispersing male mountain lion from the Western Sierra was documented on site indicates that the Project area has the potential to provide critical connectivity and gene flow between the Western Sierras and the Central Coast and Southern California DPS. This, in combination with the CESA listing in 2026 highlights the tenuous yet critical importance of connectivity in the Project area. A large development that destroys habitat where mountain lions have been documented (via radio-collar data and tracks) and increases traffic, noise, light, rodenticides, invasive species and pets, and disease in the region could further isolate the vulnerable CC-S and SGSB mountain lion populations. A new analysis is required by CEQA.

B.4-9 Cont.

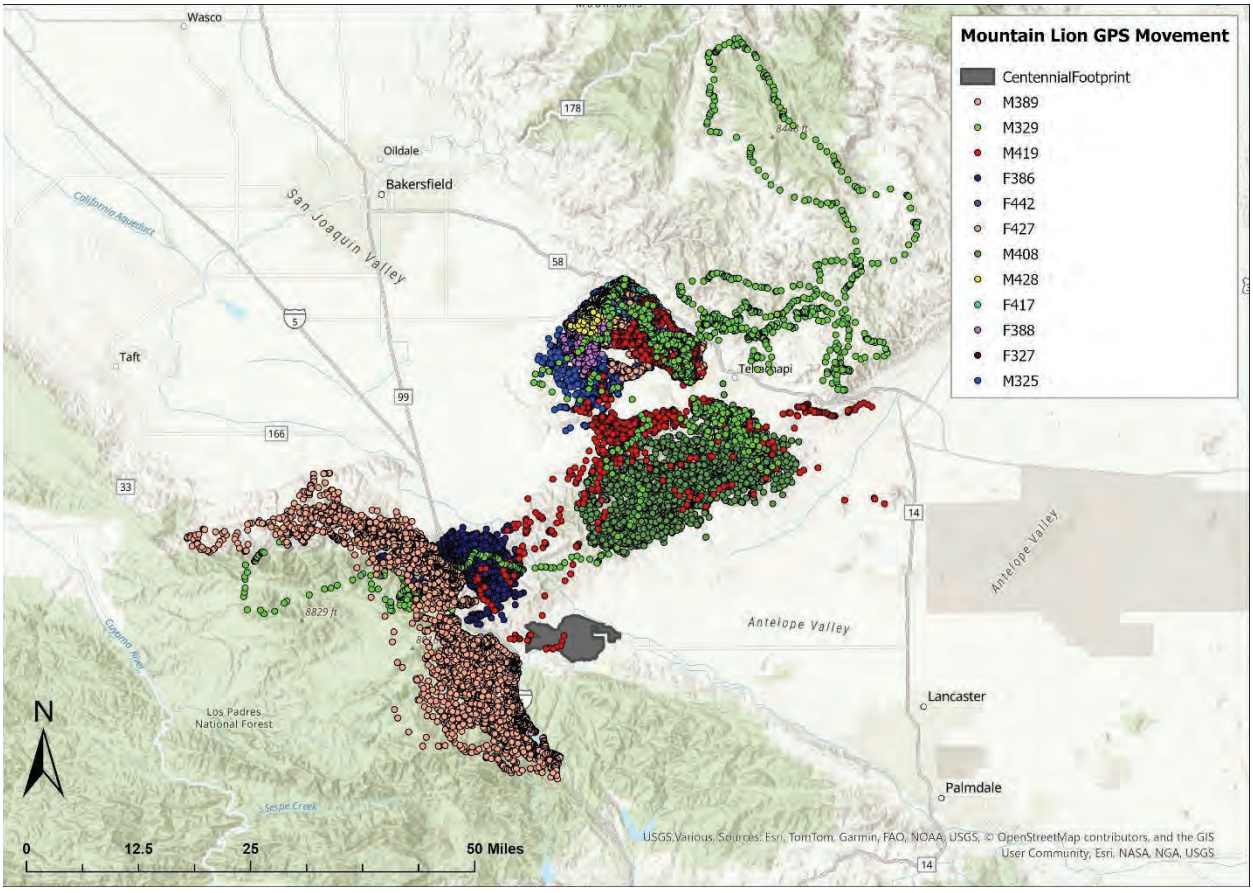


Figure 2. UC Davis California Carnivores Program mountain lion collar data from their ongoing study: Understanding ecological and human-related factors affecting felid movement in a critical wildlife linkage. Data and visualization courtesy of the UC Davis California Carnivores Program.

Numerous studies, most of which have been published after the EIR was previously approved in 2019, highlight the impacts of human activities on mountain lions. Human-caused mortalities—including vehicle strikes, rodenticide poisoning, depredation kills, poaching, and wildfire—are the leading cause of death for mountain lions across California, exceeding natural mortality rates (Benson et al., 2023; Benson, Sikich, et al., 2020; Nisi et al., 2023; Vickers et al., 2015). In addition, human activities also alter these large carnivores' behavior in ways that likely further impede important movement and gene flow. For example, researchers found that mountain lions are so fearful of humans and noise generated by humans that they will abandon the carcass of a deer and forgo the feeding opportunity just to avoid humans (J. A. Smith et al., 2017). The authors concluded that even "non-consumptive forms of human disturbance may alter the ecological role of large carnivores by affecting the link between these top predators and their prey" (J. A. Smith et al., 2017). In addition, mountain lions have been found to respond fearfully upon hearing human vocalizations, avoiding the area and moving more cautiously when hearing humans (J. A. Smith et al., 2017; Suraci et al., 2019)..

Other studies have demonstrated other shifts in behavior and movement patterns of pumas in response to human activities, like increased avoidance behavior, changes in energy expenditure, and shifts towards more nocturnal activities shifts in response to human presence, more roads and traffic, and higher development densities (Bolas et al., 2025; Dougherty et al., 2025; Lucas, 2020; Nickel et al., 2020, 2021; Nisi et al., 2022, 2023; J. A. Smith et al., 2015, 2019; Y. Wang et al., 2017; Wilmers et al., 2013, 2021; Yovovich et al., 2020). Pumas have also been found to generally avoid areas with nearby night lighting (Barrientos et al., 2023). Thus, the increased human presence due to the Project's new roads and development could have significant negative impacts on puma survival and behavior, which could reduce movement and gene flow between the Western Sierras and the Central Coast and Southern California DPS and ultimately diminish the genetic health and long-term survival of pumas in the DPS.

B.4-9 Cont.

Human activities can also affect mountain lion communication and reproductive behaviors that are important for their survival (Yovovich et al., 2020). Males prefer to use relatively flat areas away from human influence as scrape sites to delineate territories as well as attract potential mates (Allen et al., 2015, 2016; Yovovich et al., 2020). Similarly, when nursing females (with kittens less than 8 weeks old) shrink their home ranges to an average of 9 km^2 while their young were most vulnerable, they prefer undeveloped lands away from human disturbance, opting for habitat with protective cover and sufficient water and prey availability (Yovovich et al., 2020). The loss of adequate undisturbed communication and nursery habitat could disrupt important communication and reproductive behaviors that facilitate social structure and overall survival.

In a study conducted from 2002 to 2019 in the CC-S puma population, scientists found high human-caused mortality rates in puma adults and high intraspecific mortalities among subadults (Benson, Sikich, et al., 2020). Most known causes of death among adults and subadults (14/20) were directly human-caused: vehicle strikes, rodenticide poisoning, poaching, and wildfire. The remaining six known (6/20) causes of deaths were intraspecific killing (Benson, Sikich, et al., 2020). And while intraspecific killings have been documented to naturally occur in mountain lion populations, it was likely exacerbated in the CC-S population with the presence of significant movement barriers that prevent subadults from being able to adequately disperse,

which likely led to increased conflicts with territorial males (Benson, Sikich, et al., 2020; Riley et al., 2014). The CC-S puma population is relatively small, extremely isolated, and geographically limited. Improved connectivity and gene flow is essential to prevent local extinction. This highlights the urgent need to protect and enhance wildlife connectivity in and near the Project area.

There are many scientific studies that provide insights on the profound impacts human activities and infrastructure have on mountain lion survival, and they emphasize the need to adequately assess and mitigate impacts to this CESA-listed species in the Project area. These studies add to the accumulating evidence that mountain lions require a habitat mosaic that provides sufficient room to roam away from human-disturbed areas and connected to expansive, intact, heterogeneous habitats (Dickson et al., 2005; Dickson & Beier, 2002; Kertson et al., 2011; Zeller et al., 2017). Continued construction of roads and development in mountain lion habitat with little regard for their movement and behavioral needs has direct and indirect lethal and sublethal impacts that threaten the persistence of Southern California and Central Coast puma populations. CEQA requires a subsequent EIR that adequately analyzes these potential impacts. B.4-9 Cont.

Mountain lions are a key indicator species of wildlife connectivity and healthy ecosystems. As the last remaining wide-ranging large carnivore in Southern California, the ability to move through large swaths of interconnected habitat is vital for genetic connectivity and their long-term survival. Local extinction of mountain lions in the region could have severe ecological consequences. Many scavengers, including many raptors, foxes, and numerous insects, would lose a reliable food source (Barry et al., 2019; Elbroch et al., 2017; Labarge et al., 2022; Ruth & Elbroch, 2014). Fish, birds, amphibians, reptiles, rare native plants, and butterflies could potentially diminish if this apex predator were lost (Ripple et al., 2014; Ripple & Beschta, 2006, 2008; Sonawane et al., 2026). Loss of this ecosystem engineer and important predator-prey dynamics could have cascading effects on other plant and animal species, potentially leading to a decrease in biodiversity and diminished overall ecosystem function (Barry et al., 2019; Benson, Mahoney, et al., 2020; Elbroch et al., 2017; Ripple et al., 2014; Sonawane et al., 2026).

There is Significant New Information Regarding Gray Wolves.

Gray wolves are an endangered species protected under both CESA and the federal Endangered Species Act. In February 2026 female gray wolf BEY03f, who has been documented in the Yowlumni Pack territory in Tulare County, travelled south through Antelope Valley and into the Sierra Pelona Mountains, and then returned north through the Tehachapis (Allard & Sternfield, 2026; Siedman, 2026). Wolf BEY03f was documented in close proximity to the Project area, and may have moved through the Project area itself (Figure 3). This is the first time a gray wolf has been documented in LA County in more than a century. Her migration near and potentially within the Project area further emphasizes the Project area's importance for wildlife connectivity for large carnivores like wolves and mountain lions, as well as other wildlife. The previously approved EIR lacks any analyses on the Project's impacts to gray wolves or connectivity for gray wolves. CEQA requires a subsequent EIR to fully analyze and mitigate the Project's impacts to gray wolves and wildlife connectivity. B.4-10

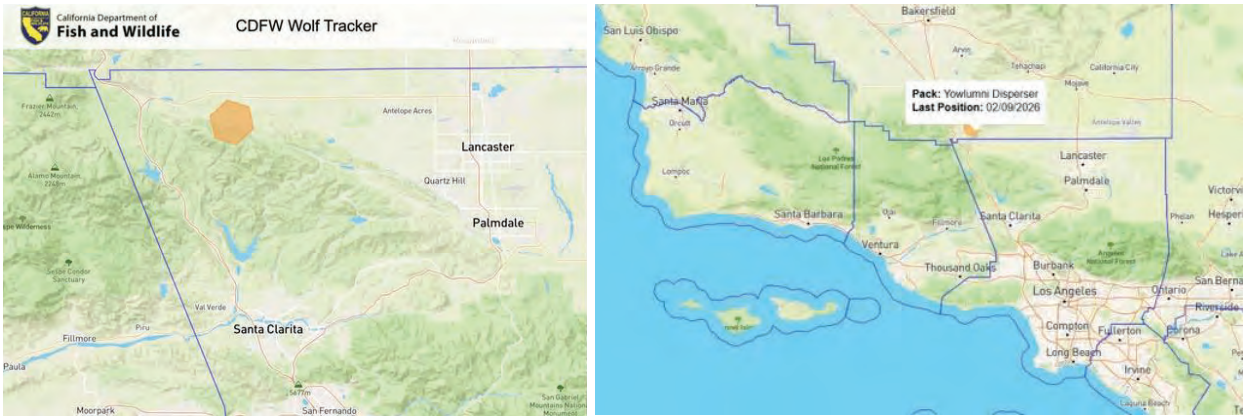


Figure 3. The general location of wolf BEY03f on February 7, 2026 (left) and on February 9, 2026 (right). Information is from CDFW's Wolf Tracker. Source: Allard & Sternfield, 2026; Siedman, 2026.

B.4-10 Cont.

There is Significant New Information Regarding Western Burrowing Owls.

New significant information since the EIR was approved in 2019 shows that western burrowing owls continuing to decline in California. On October 10, 2024, the California Department of Fish and Wildlife (CDFW) accepted a petition to list the western burrowing owl (J. Miller, 2024) as endangered under the California Endangered Species Act (CESA), determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. As a candidate species, the western burrowing owl now has full protection of a threatened species under CESA. (See Cal. Fish & Game Code §§ 2074.4, 2085; Cal. Code Regs. tit. 14 § 783.1(b).) "Take" of any endangered, threatened, or candidate species that results from a project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9.) Take of individual burrowing owls and their nests is defined as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill," and is prohibited by sections 3503, 3503.5 and 3513.

B.4-11

Historically, burrowing owls were found broadly across California in wide lowland valley bottoms, flat coastal lowlands and interior deserts. However, burrowing owls have been eliminated or nearly wiped out as a breeding species from about one-third of their former California range (J. Miller, 2024). The factors affecting California's burrowing owls today include loss of nesting and foraging habitat to urbanization; nest destruction during urban development and agricultural activities by surface disturbances such as disking, blading, grading, and over covering (Desmond et al., 2000; Haug et al., 1993; Haug & Oliphant, 1987; Rosenberg et al., 1998); pesticide use (Baril, 1993; Hjertaas, 1997; James et al., 1990; Rosenberg & Haley, 2003; Sheffield, 1997); burrowing rodent elimination (S. H. L. Anderson et al., 2001; Gordon, 1996); attempted relocation to accommodate urban development, which rarely results in successful breeding and forces remaining owls onto smaller patches of habitat (Delevoryas, 1997; Trulio, 1997); predation of young birds by non-native species (Green & Anthony, 1989); and mortality due to vehicle collisions and other anthropogenic causes.

Antelope Valley is the last stronghold for breeding burrowing owls in Los Angeles County (Kidd et al., 2007; Wilkerson & Siegel, 2011). Burrowing owls in this region are part of

the Southwestern California population. Antelope Valley burrowing owls are declining due to a high rate of habitat destruction and fragmentation resulting from development pressures in the region. Protecting burrowing owls and their habitat in this region from continued destruction and habitat loss is therefore of utmost importance to the species' persistence in California.

The previously approved EIR noted that burrowing owls were observed in and near the Project area. Therefore, the proposed Project has the potential to directly harm individual owls and indirectly harm the species and the local population through ongoing trends of habitat loss, fragmentation, and degradation. Although targeted surveys were conducted, they were conducted 20 years ago (NRC 2006, DEIR Appendix 5.7-B), and they did not follow CDFW's survey guidelines or recommendations provided in their Staff Report on Burrowing Owl Mitigation (CDFW, 2012). Similarly, the 2019 EIR's mitigation for burrowing owl impacts is also insufficient and does not follow CDFW's guidelines and recommendations. Given that burrowing owls are now a candidate species under CESA and new significant information indicates their continued decline in the region, additional impact analyses and mitigation measures following CDFW's guidelines are needed.

B.4-11 Cont.

There is Significant New Information Regarding Western Spadefoot.

New significant information since the EIR was approved in 2019 shows that western spadefoot are continuing to decline in California. Due to their dependence on ephemeral aquatic breeding sites connected to suitable upland habitat, western spadefoots are particularly sensitive to habitat disruption. Increasingly fragmented habitats can create isolated subpopulations that have higher risks of local extinction (Neal et al., 2020). In Southern California, western spadefoot populations have become extremely fragmented, and persistence of remaining subpopulations of is fragile (Halstead et al., 2021; Neal, 2019; Neal et al., 2020).

Additionally, western spadefoots are demographically unstable, meaning their population recruitment varies from year to year depending on environmental conditions, especially rainfall (R. N. Fisher & Shaffer, 1996). The species therefore experiences large annual fluctuations in population sizes, as breeding and recruitment can boom during exceptionally wet years and be impossible in dry/drought years. This high demographic instability makes them particularly sensitive to habitat alterations that may interfere with recolonization and reestablishment after unsuccessful recruitment years (R. N. Fisher & Shaffer, 1996). Western spadefoot populations are often able to persist in the face of environmental variability due to metapopulation connectivity; when one population experiences declines, migrants from surrounding populations can bolster the population and prevent local extirpation.

B.4-12

As climate change impacts become more severe and extreme weather events continue to occur, shifts in hydroperiod and increased temperatures expected to become more extreme (Montrone et al., 2019; Pyke, 2004; Thomson et al., 2016), and such population dynamics are likely to be increasingly important for species persistence. Due to reduced connectivity between suitable habitats, populations that are unable to successfully breed may decline and disappear and will be unable to be re-established by neighboring populations, leading to further permanent species decline. It is therefore highly important to consider habitat connectivity between upland and aquatic habitat as well as between different pools and pool complexes.

In September 2025 the Center petitioned for western spadefoot to be listed under CESA (Prado-Irwin, 2025), and in January 2026 CDFW recommended advancing the species to candidacy status (CDFW, 2026a). And on August 13, 2026 the California Fish and Game Commission met and voted to advance the species to candidacy status. Given this new and significant information, CEQA requires additional analyses and mitigation regarding the Project's impacts to this imperiled species.

The previously approved EIR's western spadefoot analysis is incomplete. The DEIR concluded that "western spadefoot is not expected to occur on the Project site" (DEIR at 5.7-146) because western spadefoot was not observed during focused surveys in 2004 and 2005. However, surveys were only conducted on 2,855 acres west of the Aqueduct, which is less than 25% of the total Project area. The remaining acreage east of the Aqueduct was not surveyed despite the presence of suitable habitat, including "cattle ponds, ephemeral ponds, and other areas where there are water ponds during the wet season" (DEIR at 5.7-110). Therefore, the conclusion that western spadefoot are likely not in the Project area is unsubstantiated. In fact, the DEIR even contradicts itself, stating that western spadefoot "may occur in other unsurveyed areas on the Project site where there is potentially suitable habitat," (DEIR at 5.7-110). Given the previously approved EIR's deficiencies and significant new information that western spadefoot have continued to decline and is now a CESA candidate, targeted surveys in suitable habitat east of the Aqueduct should be conducted to determine the environmental baseline for this special-status species in the Project area so that adequate impact analyses can be conducted and appropriate avoidance and mitigation measures can be implemented.

B.4-12 Cont.

CEQA requires that an EIR identify the environmental baseline against which project impacts will be assessed. (Guidelines § 15125(a) [agency must describe "baseline physical conditions by which a lead agency determines whether an impact is significant"].) "Establishing a baseline at the beginning of the CEQA process is a fundamental requirement so that changes brought about by a project can be seen in context and significant effects can be accurately identified." (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 89 [emphasis added].) An accurate environmental baseline is critical to the CEQA process because it forms the foundation for the entire EIR, serving as the point of comparison for evaluating the significance of impacts. (*County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 953-54.) Accordingly, an EIR does not comply with CEQA where the environmental baseline is "inaccurate, incomplete, or misleading." (*Clover Valley Foundation v. City of Rocklin* (2011) 197 Cal.App.4th 200, 219 (citation omitted).)

II. The RPDEIR's New Analysis of Wildfire Risk Remains Inadequate.

On January 7, 2025 the world watched Los Angeles go up in flames. In a matter of just three days, fires killed at least 30 people, destroyed more than 16,000 structures, and burned more than 34,000 acres of shrublands and oak woodlands. Post-fire rains caused flooding, mudslides, and debris flows, which threatened communities and polluted nearby waters. Toxic debris plagues the landscape, with dangerously high levels of lead, arsenic, and other metals in soils within and near the fire footprint.

B.4-13

Although the RPDEIR provides additional information and mitigation measures in response to the 2019 lawsuits and the Climate Resolve settlement agreement, the RPDEIR's

wildfire analysis and mitigation remain deficient. A mounting body of scientific research and experience, discussed below, plainly demonstrates that placing more people in fire-prone landscapes increases ignition risk, yet the RPDEIR implausibly claims that the proposed Project will keep people safe from fire. The RPDEIR fails to adequately assess and mitigate the Project's impacts to wildfire risk.

Wildfires are a natural and necessary process in many of California's ecosystems, and many areas need beneficial fire to restore ecosystem health and cultural connection to the land. However, the last decade of unprecedented wildfires in the wildland urban interface (WUI)—where homes extend into the natural landscape—has been devastating for people and wildlife. Poor land-use planning plays a primary role in destructive wildfire. Since 2015 California wildfires have killed more than 230 people and destroyed more than 75,000 structures in the WUI. Hundreds of thousands of people have had to evacuate their homes and endure power outages, and millions have been exposed to unhealthy levels of smoke and toxic air, soil, and water pollution. Meanwhile costs for fire suppression, loss of life, medical expenses, property damage, and indirect economic losses are in the hundreds of billions of dollars (Danielle, 2025; Li & Yu, 2025; D. Wang et al., 2021).

Costs of wildfires are skyrocketing. Researchers found that the 2018 California wildfires, which included the Camp Fire that burned through Paradise and the Woolsey Fire that burned through Ventura and Santa Barbara, resulted in $148.5 billion in in capital losses, health costs related to air pollution exposure, and indirect losses due to broader economic disruption cascading along regional and national supply chains (D. Wang et al., 2021). B.4-13 Cont.

Experts estimate the costs of the 2025 Los Angeles fires could be as high as $136 billion when considering property and capital losses, wages lost by local businesses and employees, and a decline in county-level GDP (Li & Yu, 2025). These estimates do not include the costs of health impacts; costs could continue to rise as we learn more about the extent of the damage and the long-term impacts of exposure to toxic air pollutants, soil pollutants, contaminated water, and the trauma of fleeing wildfires and/or losing homes, schools, and communities.

The science is irrefutable. Almost all destructive wildfires are accidentally ignited by humans or human infrastructure near roads and development (Balch et al., 2024; Chen & Jin, 2022; Syphard, Rustigian-Romsos, et al., 2019). Development and roads in fire-prone landscapes increases ignition risk while climate change is amplifying fire conditions. Meanwhile, developers who sell homes in wildfire risk areas leave the burden of recovery on homeowners and taxpayers.

CEQA requires an EIR to identify and analyze a project's significant environmental impacts, including those impacts caused or exacerbated "by bringing development and people into the area affected." (Pub. Resources Code, §§ 21002, 21002.1, subd. (a); CEQA Guidelines, § 15126.2, subd. (a).) The impacts of development in areas prone to wildfire specifically require consideration: "the EIR should evaluate any potentially significant direct, indirect, or cumulative environmental impacts of locating development in areas susceptible to hazardous conditions (e.g., floodplains, coastlines, *wildfire risk areas*), including both short-term and long-term conditions, as identified in authoritative hazard maps, risk assessments or in land use plans

addressing such hazard areas." (CEQA Guidelines, § 15126.2, subd. (a), emphasis added.). The PRDEIR fails to comply with CEQA.

In 2018, the State officially recognized that introduction of development in the wildland urban interface increases ignition risk. (OPR 2018 Final Statement of Reasons – Update to CEQA Guidelines Checklist]; see also *Clews Land & Livestock, LLC v. City of San Diego* (2017) 19 Cal.App.5th 161, 193 [recognizing potential for significant environment effects when project brings new development to a wildfire prone area].) Moreover, as discussed in a 2021 Center Report, "Built to Burn: California's Wildlands Developments are Playing with Fire," decisionmakers must reckon with California's wildfire history and acknowledge that reckless land-use planning is increasing wildfire risk and putting more people in harm's way (Yap et al., 2021). B.4-13 Cont.

A. The RPDEIR Fails to Consider Traditional Ecological Knowledge and Indigenous Science in the Wildfire Analyses.

The RPEIR fails to adequately analyze the area's historical fire regimes and the role Indigenous communities likely played in shaping the fire ecology of habitats in and adjacent to the Project area. For millennia Indigenous burning practices and lightning strikes drove ecosystem-specific fire regimes that varied in frequency, size, severity, and seasonality (K. Anderson, 2018; Cuthrell, 2013; Kimmerer & Lake, 2001; Stephens et al., 2007). Numerous Tribes used and continue to use burning for many benefits, including increasing productivity of culturally important plants, managing wildlife, increasing water availability, and reducing the chances of severe fire (K. Anderson, 2018; Kimmerer & Lake, 2001; MacDonald et al., 2023). Because of this history, many ecosystems have adaptations to survive and thrive in specific wildfire regimes (i.e., good or beneficial fire). But the genocide and displacement of Native Peoples, criminalization of fire practices, and reckless land use in the last 150 years have dramatically altered fire regimes while placing more people in harm's way (MacDonald et al., 2023). This history is important for understanding and analyzing wildfire risk and behavior in a given region and diverse ecosystems. B.4-14

Indigenous communities should be included in discourse over climate change and wildfire. They are disproportionately impacted by wildfire. Native Americans were found to be six times more likely than other groups to live in high fire-prone areas, and high vulnerability due to socioeconomic barriers makes it more difficult for these communities to recover after a large wildfire (Davies et al., 2018). In addition, farmworkers, who are majority people of color and often include migrant workers that come from Indigenous communities, often have less access to healthcare due to immigration or economic status. They are more vulnerable to the health impacts of poor air quality due to increased exposure to air pollution as they work. Yet farmworkers often have to continue working while fires burn, and smoke fills the air, or risk not getting paid (Herrera, 2018; Kardas-Nelson et al., 2020; Parshley, 2018).

Ramos (2022) states, "Indigenous communities have often been marginalized in the sciences through research approaches that are not inclusive of their cultures and histories." Traditional ecological knowledge ("TEK") is often excluded from analyses or distilled to conform to Western science (Ramos, 2022). EIRs, like this one, often fail to acknowledge that Indigenous communities and cultural burning played a role in California's historical fire activity

and often only mention previous wildfires in the area in CalFire records. This perpetuates the exclusion and marginalization of Indigenous communities and TEK. Consultation with local Native Tribes and incorporation of Indigenous science, including but not limited to oral histories, ethnographies (that may include burn scars and charcoal records), and archeological data should be incorporated in fire history analysis. As a society, we need to work towards integrative research that "transcends disciplinary boundaries" and employs a range of methodological options to get a deeper understanding of the relationship between people and ecosystems (Ramos, 2022). Doing so will help inform fire management strategies and mitigation measures that work towards reducing harms of wildfire to people while facilitating beneficial fire for the appropriate ecosystems.

B.4-14 Cont.

B. The RPDEIR Fails to Adequately Assess and Mitigate the Project's Impacts to Wildfire Risk.

Although the RPDEIR provides some discussion regarding the region's climate, topography, vegetation, colonial fire history, and climate change, the impact analysis fails to adequately disclose, assess, and mitigate the Project's impacts to wildfire risk. The RPDEIR correctly acknowledges that "new developments in the [wildland urban interface] may result in an increased potential for [human-caused wildfire ignitions]" (RPDEIR at 2.3-40), yet, despite the science and the last decade of devastating wildfires in the wildland urban interface showing us that putting more people in fire-prone landscapes is dangerous, the RPDEIR erroneously concludes that the Project's impacts on wildfire risk would be less than significant with the proposed mitigation. The RPDEIR dangerously downplays the Project's wildfire risk and creates a false sense of security with inadequate mitigation.

The RPDEIR states that "[i]t is difficult to determine the direct correlation between ignition risk and increased people residing in the [wildland urban interface]" (RPDEIR at 2.3-41). However, this is untrue. There is abundant evidence, including extensive scientific literature on wildfire risk in the wildland urban interface, that clearly demonstrates that almost all destructive wildfires are ignited by humans or human infrastructure near roads and development (Balch et al., 2024; Chen & Jin, 2022; Syphard, Rustigian-Romsos, et al., 2019). Placing more homes and people in high fire-prone areas would only increase the potential likelihood of these ignition sources and put more families in harm's way when, not if, a fire blows through. The RPDEIR downplays or ignores the Project's ignition risk.

B.4-15

The RPDEIR focuses on the vegetation as "fuels" in the impact analysis, blaming "the presence of various vegetation communities and open space" for "the potential for wildfire on the Project site [to] be a significant impact" (RPDEIR at 2.3-55). This framing is misleading and avoids acknowledging the primary source of the project's impacts: putting more people and homes in the area and increasing the risk of wildfire ignition and spread. The presence of people and infrastructure increases ignition risk, while structures also function as fuels and can spread fire. The RPDEIR's myopic focus on the existing vegetation onsite also neglects the role of climate change on how fires can spread once they are ignited, their intensity, and their severity.

The RPDEIR repeatedly states that the Project would include a "multi-scaled approach to fire protection," but the proposed mitigation is insufficient. Proposed mitigation includes compliance with Chapter 7A of the California Building Code, internal sprinklers, fuel

management zones, three new fire stations, undergrounding powerlines, increasing housing density, and deferred fire protection and emergency response plans to reduce the Projects wildfire risk impacts to less than significant. However, these measures do not guarantee safety when a fire burns through the area. The RPDEIR's mitigation measures for wildfire impacts are improperly deferred, unenforceable, or lack evidence of their effectiveness at reducing impacts to less than significant. B.4-15 Cont.

i. Electrical Transmission Lines are not the Only Ignition Source in the Wildland Urban Interface.

The RPDEIR states that electrical transmission lines will be undergrounded to reduce fire risk. Although several destructive wildfires in the wildland urban interface have been ignited by electrical transmission lines in extremely windy and hot conditions, the power grid serving the Project area would still include above-ground infrastructure, including substations, poles, transformers, and regulator stations (RPDEIR at 2.3-151). Such infrastructure can emit large amounts of heat, especially as the weather gets hotter and energy demand increases. And as CalFire recently reported, the Eaton Fire, which killed at least 19 people and destroyed more than 9,400 structures, and burned more than 14,000 acres, was sparked by Southern California Edison transmission towers (CalFire, 2026a, 2026b). Undergrounding the transmission lines does not necessarily reduce the Project's wildfire impacts to less than significant. B.4-16

In addition, electrical transmission lines are not the only source of ignitions in the wildland urban interface. For example, the 2025 Palisades Fire, which killed at least 12 people and destroyed more than 6,800 structures and burned more than 23,400 acres, was a flare up of an arson fire that was ignited a week earlier and was thought to be extinguished. The 2017 Tubbs Fire, which killed at least 22 people and burned more than 5,600 structures and more than 36,800 acres, was ignited by a homeowner's private electrical system. The 2018 Carr Fire, which killed eight people and burned more than 1,600 structures and more than 200,000 acres, was ignited by sparks from a flat tire. The 2020 El Dorado Fire, which killed one firefighter and burned 20 structures and close to 23,000 acres, was caused by a pyrotechnic device at a gender-reveal photo shoot. And although still under investigation, the 2025 Pickett Fire, which burned more than 6,800 acres in Napa County, was caused by a winery preparing for a wedding ceremony. Smoking, and playing with fire are other ways people can ignite wildfires in the wildland urban interface. Placing people in fire-prone areas increases ignition risk and places more people in harm's way, even if powerlines are underground. There is no basis for the RPDEIR to rely on undergrounding powerlines to mitigate the risk of wildfire ignitions to less than significant. The RPDEIR downplays and dismisses the Project's impact to wildfire ignition risk.

ii. Structures Built to Code Still Ignite and Spread Fire.

The RPDEIR mitigation also relies on fire-resistant measures in the California Building Code to keep people safe from fire. Alarmingly, the RPDEIR goes as far as to claim that because "[a]ll structures in Centennial community would conform to the ignition-resistant building codes codified in Chapter 7A of the California Building Code" then they would "require minimal firefighting resources for protection" and therefore sheltering in place would be a viable "contingency option when it is considered safer than evacuation" (RPDEIR Appendix F – Fire B.4-17

Protection Plan [Exhibit 1] at 7). The evidence shows, however, that conformance to building codes, including the "firesafe" standards, cannot make structures or communities fireproof.

In an analysis that included more than 40,000 structures exposed to wildfire between 2013 and 2018 in California, many structures deemed "firesafe" were destroyed (Syphard, Rustigian-Romsos, et al., 2019). And while an analysis conducted in the aftermath of the 2018 Camp Fire showed that while conformance with the new building codes improved home survival, with 38.5% of homes built to code undamaged compared to 11.5% of homes built prior to 2008, 61.5% of the homes built to fire-safety codes were still destroyed (Knapp et al., 2021). Structures built to code are not immune from igniting or spreading fire.

Development in and near fire-prone areas should be avoided. If unavoidable, mitigation measures should require structures to have ember-resistant vents, fire-resistant roofs, fire-resistant siding, multi-paned windows, and irrigated defensible space immediately adjacent to structures and around communities. External sprinklers (not internal sprinklers, which are proposed in the RPDEIR) with an independent water source could reduce structures' flammability. Rooftop solar and clean energy microgrids could reduce fire risk from utilities' infrastructure during extreme weather (as mentioned above, even if transmission lines are underground, substations, poles, transformers, and regulator stations would still be aboveground [RPDEIR at 2.3-151]). In addition, mitigation measures should include equitably retrofitting existing communities near the Project area with similar fire-resilient measures, providing wildfire personal protective equipment (e.g., N95 masks, air purifiers), and shelter-in-place facilities. The Project proponent should fully fund education and awareness for workers, new residents, and nearby communities should be provided in perpetuity and include how to reduce ignition risk. Maintenance and enforcement of ignition reduction measures should also be fully funded by the Project proponent and implemented in perpetuity. In addition, developers should be responsible for the insurability of homes and structures as well as recovery and remediation costs when (not if) a fire occurs in or near the Project area.

B.4-17 Cont.

iii. The Fuel Management Plan is Insufficient and Could Do More Harm than Good.

The RPDEIR proposes a fuel management plan that fails to follow the best available science and could do more harm than good. The plan includes fuel modification zones of up to 200 feet from structures and a minimum of 20 feet along roads in which vegetation will be removed, thinned, or replaced. However, studies show that defensible space more than 100 feet from structures does not provide additional protection from fire (Syphard et al., 2014; Syphard, Rustigian-Romsos, et al., 2019). In fact, the first five feet immediately adjacent to the structure has been found to be the most critical to remove combustibles (Knapp et al., 2021). However, it is important to note that vegetation around buildings is not the main driver of structure damage from wildfires and that other combustible materials, including wooden decks and fences, log piles, and garbage bins are fire hazards near structures (Knapp et al., 2021; Mockrin et al., 2023; Uribe, 2021; Zamanialaei et al., 2025). In fact, healthy, well-maintained trees and shrubs near homes can actually protect against wind-blown embers and wildfire spread (Escobedo et al., 2025; Knapp et al., 2021; Mockrin et al., 2023; Moritz & Carmignani, 2025; Uribe, 2021).

B.4-18

Although there are instances in which vegetation management in combination with structure-hardening can help improve community wildfire resilience, removing and thinning native vegetation as fire abatement does not guarantee safety from fire. Such mitigation could also have unintended consequences. For example, the removal of native shrubs like laurel sumac, chamise, ceanothus, sage brush, and other native vegetation near homes and roads in the name of defensible space could lead to the establishment of invasive grasses that are even more flammable, which could make homes more vulnerable to fire by increasing ignition risk (Fusco et al., 2022; Syphard, Brennan, et al., 2019; Syphard et al., 2018). In addition, the RPDEIR would require green lawns while allowing the planting of non-native ornamental species, which could lead to introduced invasive species, which could potentially increase wildfire risk. Such vegetation clearance also destroys and degrades habitats that many sensitive animals and plants rely on. The proposed fuel management plan is insufficient.

B.4-18 Cont.

iv. Once Structures Ignite, Higher Density Development is at Greatest Risk of Fire.

The RPDEIR also asserts incorrectly that the Project's clustered planned development is "not associated with increased wildfire risk" (RPDEIR at 2-3-66). The assertion is dangerously misleading. Although some studies have found that low to intermediate development density had the greatest risk of burning in a wildfire, recent analyses show that once structures ignite, higher density development is at greatest risk (Calkin et al., 2023; Knapp et al., 2021; Syphard & Keeley, 2020). In a study specifically investigating the 2025 Eaton and Palisades fires, researchers found that "structure density was by far the strongest predictor of structure loss, where structures in denser areas were more likely to be destroyed" (Kenny et al., 2026). And a 2023 study conducted by the U.S. Forest Service found that California wildfires are increasingly affecting urban areas (Yadav et al., 2023).

B.4-19

Fires can spread from structure to structure, as embers and radiant heat from burning structures easily ignite adjacent structures. In an analysis of the 2018 Camp Fire, scientists found that homes were more likely to burn the closer they were to destroyed structures, suggesting that higher density development had increased risk of destruction once the fire reached the development (Knapp et al., 2021). Recent California fires provide clear evidence that high density development is neither immune to wildfire nor does it reduce wildfire risk. The four most destructive California wildfires, the 2018 Camp Fire, 2025 Eaton and Palisades fires, and 2017 Tubbs Fire, all burned through large, urban communities, killing at least 135 people, displacing hundreds of thousands of people, destroying more than 40,500 structures, and exposing millions to toxic air pollution. This highlights both the vulnerability and threat of wildfire embedded in any kind of development in fire-prone areas. Expanding the wildland urban interface deeper into fire-prone habitats, regardless of density, increases ignition risk and adds fuel to the fire.

v. To Be Effective, New Fire Stations Require Funded Personnel and Maintenance.

The RPDEIR states that the Project would include "at least three and up to four fully equipped fire stations on site" as proof that that there will be "[s]ubstantial on-site firefighting capability…thus ensuring fast response to fire and medical emergencies" (DEIR at 3.7-20). However, it is unclear if a station would actually be built and if human and monetary capital will be sufficient to sustain and maintain the new fire stations. There is no requirement that the developer pay for the county's costs of *operating* these stations, nor is there any guarantee that

B.4-20

sufficient firefighting personnel will be available. During the LA wildfires in January 2025, firefighters lacked enough personnel and fire engines to keep all communities safe (Fuller et al., 2025; Toohey & Fry, 2025). The personnel cost over the life of the Project (essentially forever) will likely be hundreds of millions of dollars. Funding is already lacking for the increasing costs of fire suppression and property damage from wildfires in California, and the developer is not required to reimburse CalFire for the many millions (or billions) of dollars Cal Fire will likely expense when (not if) the Project needs to be defended from wildfire. And as climate change continues to amplify extreme weather conditions and wildfire risk (Goss et al., 2020; Swain, 2021; Swain et al., 2018, 2025), it will become even more challenging to protect communities from wildfire. Such information must be analyzed when assessing wildfire risk in the wildland urban interface. The EIR fails to adequately assess and mitigate the Project's impacts to wildfire risk to less than significant.

B.4-20 Cont.

vi. The Analysis and Proposed Mitigation Do Not Adequately Account for the Impacts of Climate Change.

The RPDEIR does not adequately account for the impacts of climate change in the proposed wildfire mitigation measures. Progressively hotter, drier conditions and more extreme weather events due to climate change are making it easier for wildfires to ignite and spread (Barnes et al., 2025). Climate change is exacerbating extreme weather conditions and wildfire impacts (Williams et al., 2019). The number of days with extreme fire weather conditions in California has doubled since 1980, and further climate change will amplify that trend (Goss et al., 2020). In addition, hotter and drier conditions combined with later and shorter rainy seasons are making the landscape more conducive to wildfire ignitions and spread while lengthening the fire season (Dong et al., 2022; Goss et al., 2020; Luković et al., 2021; Ma et al., 2021; Madakumbura, Moritz, et al., 2025; Madakumbura, Thackeray, et al., 2025; Swain, 2021).

B.4-21

Experts claim that climate change is responsible for intensifying what would have already been extreme fires in Altadena and Pacific Palisades. Two very wet years in a row (winters of 2022-2023 and 2023-2024) contributed about 10% of vegetation on the landscape, and the following uncharacteristically hot summer, a record-breaking fall heatwave, and a very dry start to the rainy season likely made the vegetation 25% drier (Madakumbura, Thackeray, et al., 2025). Combined with extreme seasonal winds and human ignitions, the Eaton and Palisades fires ravaged unexpecting communities. Experts estimated that the hotter, drier conditions and extreme fire weather due to climate change made these devastating fires 35% more likely and 6% more intense (Barnes et al., 2025). Continued climate change and increasing fire conditions will lead to more intense and more destructive wildfires (Barnes et al., 2025; MacDonald et al., 2023).

Researchers have also found that fires are spreading faster. Between 2001 and 2020 the maximum daily growth rate of wildfires in the U.S. more than doubled, and California fires grew almost 400% faster (Balch et al., 2024). Experts suggest that this trend could be due to warming temperatures, habitat conversion to more flammable vegetation (i.e., nonnative grasses), and/or the co-occurrence of high winds with increasing human-related ignitions (Balch et al., 2024). The 2026 Ridge Fire that ignited on August 7th, less than two miles from the proposed Project, spread more than 1,000 acres in less than eight hours (Ferrara, 2026; Harter & Jarvie, 2026). The

fire caused severe traffic when it jumped I-5 and evacuation warnings are in place. More than 350 firefighters have been battling the fire in temperatures over 100°F.

Scientists predict that climate change will continue trends of hotter and drier conditions and shorter rainy seasons, which will increase the flammability of vegetation, lengthen the fire season, increase extreme fire weather, heighten wildfire risk, and lead to more intense wildfires (Barnes et al., 2025; MacDonald et al., 2023). Although the RPDEIR mentions climate change, the RPDEIR fails to properly account for the impacts of climate change on wildfire risk in the wildland urban interface.

B.4-21 Cont.

The RPDEIR neglects the fact that climate change is amplifying extreme fire weather and that almost all destructive wildfires are ignited by humans or human infrastructure, not the vegetation itself (Balch et al., 2024; Chen & Jin, 2022; Syphard, Rustigian-Romsos, et al., 2019). These factors must be comprehensively considered to adequately assess the Project's impacts to wildfire risk.

C. The RPDEIR Fails to Adequately Assess the Project's Impacts on Wildfire and Wildfires in the Wildland Urban Interface Threaten Vulnerable Wildlife.

The RPDEIR fails to consider the Project's impacts of increasing ignition risk on sensitive and special-status species and habitats. Wildfires are a natural and necessary process in many of California's ecosystems, and many areas need beneficial fire to restore ecosystem health and cultural connection to the land. For millennia, Indigenous burning practices and lightning strikes drove ecosystem-specific fire regimes that varied in frequency, size, severity, and seasonality (K. Anderson, 2018; Cuthrell, 2013; Kimmerer & Lake, 2001; Stephens et al., 2007). Numerous Tribes used and continue to use burning for many benefits, including increasing productivity of culturally important plants, managing wildlife, increasing water availability, and reducing the chances of severe fire (K. Anderson, 2018; Kimmerer & Lake, 2001; MacDonald et al., 2023).

B.4-22

Because of this history, many ecosystems have adaptations to survive and thrive in specific wildfire regimes (*i.e.,* good or beneficial fire). But the genocide and displacement of Native Peoples, criminalization of fire practices, and reckless land use (*i.e.*, logging and development) in the last 150 years have dramatically altered fire regimes while placing more people in harm's way (MacDonald et al., 2023). This disruption has led to imbalances in the County's native plant communities. For example, extended fire suppression in habitats that historically burned relatively frequently, like grasslands, oak woodlands, and some forests, has led to a fire deficit in these systems (Stephens et al., 2007). When these fire-deficient habitats are unintentionally ignited, larger areas of habitat experience severe fire. Although small patches of severe fire can have ecological benefits, large areas of severe fire can reduce biodiversity and resilience (Ayars et al., 2023; J. E. D. Miller et al., 2018; Steel et al., 2021).

Other habitats, like chaparral and sage scrub, have a different relationship with wildfire. These habitats are adapted to high-severity wildfires at relatively infrequent intervals ranging from 30 to 130 years or more (Baker & Halsey, 2020; Keeley & Fotheringham, 2001; Keeley & Syphard, 2018; Stephens et al., 2007), but increased fire frequency from human ignition sources due to sprawl development is now causing these shrubland habitats to receive too much fire. This

altered fire regime is the primary driver of habitat degradation and loss of biodiversity in these ecosystems and leads to conversion of these important habitats to non-native grasses and forbs that burn more easily throughout more of the year. This perpetuates a dangerous cycle that increases wildfire ignitions, lengthens the fire season, and eliminates native shrubland habitats and biodiversity (Balch et al., 2013; Fusco et al., 2022; Syphard, Brennan, et al., 2019).

Almost all destructive wildfires are ignited by humans or human infrastructure near roads and development (Balch et al., 2024; Chen & Jin, 2022; Syphard, Rustigian-Romsos, et al., 2019). The last decade of unprecedented wildfires in the urban wildland interface are pushing fragmented populations of sensitive species to the brink. In addition to native plant communities, wildlife, including genetically isolated mountain lions, remnant populations of frogs and fish, resident and migratory birds, nearby marine life, and more are all vulnerable to direct and indirect impacts from wildfire (Blakey et al., 2022; Nihei et al., 2024; Sanderfoot et al., 2021). They can suffer from burns, smoke-induced asphyxiation, heat stress, traumatic injuries, toxic air pollution, post-fire debris flows and landslides, toxic runoff, and death (Garcês & Pires, 2023).

Heavy rains after wildfire can trigger landslides and debris flows that threaten small populations of sensitive, less mobile species that have been diminished due to habitat loss and fragmentation from sprawl development, dams, disease, non-native predators, and other threats. After the 2020 Bobcat Fire, biologists were desperate to rescue remnant populations of yellow-legged frogs, Santa Ana suckers, unarmored threespine stickleback fish, speckled dace, arroyo chub and arroyo chub because they were concerned that post-fire debris flows due to winter rains would wipe out their populations in the fire zone (Sahagun, 2020). Biologists conducted similar rescue missions for the last-known populations of Southern California steelhead and northern tidewater gobies in the Santa Monica Mountains after the 2025 Palisades Fire (Seidman, 2025a, 2025b, 2025c).

B.4-22 Cont.

Historically, these species would have been able to recolonize from neighboring populations after the loss of individuals or populations to fire impacts. Unfortunately, that ability is now limited by the species' currently small and fragmented population structure. Continued alteration of historical fire regimes due to sprawl development will further endanger remnant populations.

Scientists also warn of impacts of wildfires in the urban wildland interface to ocean health. After the 2025 LA wildfires, toxic ash was detected at least 100 miles offshore (Purtill & Xia, 2025). While marine ecosystems are adapted to vegetation fires and can even benefit from receiving important nutrients that boost phytoplankton growth from such fires, wildfires in the urban wildland interface release dangerous chemicals that can harm wildlife, including heavy metals, asbestos, polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and more. They may also play a role in toxic algal blooms. In 2025, Southern California experienced the longest, most toxic, and deadliest algae bloom, with hundreds of sea lions and dolphins dying and dozens of pelicans getting sick from domoic acid poisoning (Harter, 2025; Lin, 2025). Researchers are investigating whether debris flows from the LA wildfires played a role in the early onset and length of this deadly bloom.

D. Wildfires in the Wildland Urban Interface Harm People.

The RPDEIR fails to adequately consider wildfire impacts to human health and safety. When wildfires burn through communities, they threaten homes, livelihoods, lives, and health. In addition to the immediate impacts of lives and homes lost, evacuations and displacement, impacts from air pollution, soil contamination, lost jobs, and the trauma of escape and recovery extend well beyond the fire footprint and last long after the fire is extinguished. Impacts to wildlife are also potentially long-lasting. The Project will bring more people and increased human activity into fire-prone landscapes and increase ignition risk. Such a project requires careful and comprehensive analyses of the Project's impacts to public health and evacuation safety due to increasing ignition risk.

i. Wildfire Crises Overburden Wildfire Protection Services and Threaten Public Safety.

New projects in fire-prone areas must consider the additional burden on local agencies to protect communities from wildfire. Local governments and the wildfire protection services they provide can become overwhelmed during crises.

B.4-23

An after action review of the 2018 Woolsey Fire, which resulted in three deaths and more than 1,600 structures destroyed in Los Angeles and Ventura counties, identified that the responding agencies were "overwhelmed" by the fire's "speed and weight of impact" and lacked sufficient trained staff, clear policies and protocols, crisis communication, inter-agency and inter-jurisdictional collaboration, situational awareness, real-time data availability with coordinated response tools, emergency preparedness, and evacuation plans (Citygate Associates, 2019). According to the review, "the size and speed of the Woolsey Fire, at times, outpaced the early efforts of some of the largest and most experienced and capable agencies in the United States" (Citygate Associates, 2019). The review also highlights the need to manage the public's "unrealistic expectations" of agency abilities to protect communities from fire, stating, "[w]e cannot expect that all population growth in Very High or High Fire Hazard Severity areas can be protected simply by increasing resiliency [hardening buildings, fuels treatment, and vegetation management] to wildfire and by adding more fire engines" (Citygate Associates, 2019).

These issues are widespread. They have come up in other wildfire disasters throughout the state that have occurred, including the 2017 Tubbs Fire (County of Sonoma, 2018) and 2018 Camp Fire (Constant Associates, 2020). Despite these reports on lessons learned from fires that occurred seven years ago, the County of Los Angeles and likely many other counties have failed to make the necessary improvements. This is evident with the response to the Eaton and Palisades fires. The County was plagued with the same problems as previous fires, which led to fatal errors and destruction (Jarvie, 2025; McChrystal Group, 2025). Lack of funding, insufficient staffing, unclear and outdated evacuation protocols, limited firefighting resources, insufficient communications and alerts, and more resulted in the death of at least 31 people, the destruction of more than 17,000 structures, and the loss and upheaval of many communities that will be recovering for years to come.

ii. Wildfires Impact Human Health.

When wildfires burn through communities, they threaten homes, livelihoods, lives, and health. In addition to the immediate impacts of lives and homes lost, evacuations and displacement, impacts from air pollution, soil contamination, lost jobs, and the trauma of escape and recovery extend well beyond the fire footprint and last long after the fire is extinguished. Impacts to wildlife are also potentially long-lasting. Impacts of wildfire disproportionately affect vulnerable communities with less adaptive capacity to respond to and recover from hazards like wildfire. Low-income and minority communities, especially Native American, Black, Latinx, and Southeast Asian communities, are the most marginalized groups when wildfires occur (Davies et al., 2018).

Those in at-risk populations (*e.g.,* low-income, elderly, disabled, non-English-speaking, unhoused) often have limited resources for disaster planning and preparedness (Richards, 2019). Vulnerable groups also have fewer resources to have cars to evacuate, buy fire insurance, implement fire-resilient retrofits, maintain defensible space around their homes, or rebuild, and they have less access to disaster relief during recovery (Davis, 2018; Fothergill & Peak, 2004; Harnett, 2018; Morris, 2018; Ong, Pech, Frasure, et al., 2025; Richards, 2019; Vives & Castillo, 2025). And survivors are left without resources to cope with the death of loved ones, physical injuries and emotional trauma from the chaos that wildfires have inflicted on their communities. B.4-24

Emergency services often miss at-risk individuals when disasters happen because of limited capacity or language constraints (Richards, 2019). This was the case for both the Palisades and Eaton fires. Many elderly and disabled community members unable to evacuate on their own were left stranded as the wildfires advanced, and the median age of those who died in the fires was 77 (Ellis, 2025; Jarvie et al., 2025). Meanwhile, delayed evacuation alerts and limited fire trucks in western Altadena, a predominantly Black and Latino neighborhood, resulted in 18 of the 19 deaths from the wildfire (Castleman, 2025; Ellis & Greene, 2025; Toohey & Jarvie, 2025).

In the aftermath of wildfires and other environmental disasters, news stories have repeatedly documented the lack of multilingual evacuation warnings leaving non-English speakers in danger (Axelrod, 2017; Banse, 2018; Gerety, 2015; Ong, Pech, Ong, et al., 2025; Richards, 2019). This was exemplified during the Eaton and Palisades fires; evacuation alerts were only sent in English and Spanish, leaving more than 12,000 Asian Americans with limited English proficiency in the evacuation zones without potentially life-saving information (Ong, Pech, Ong, et al., 2025).

Health impacts from wildfires can have both acute and long-term health effects that disproportionately affect vulnerable populations, like children, the elderly, pregnant women and fetuses, those with underlying chronic disease, low-income communities, and communities of color. A recent study found that wildfire smoke now accounts for up to 50% of ambient fine particle pollution ($PM_{2.5}$) in the western United States (Burke et al., 2021).

Increased exposure to fine particulates in wildfire smoke has been linked with increased hospital visits for respiratory symptoms (*e.g.*, asthma, acute bronchitis, pneumonia, or chronic obstructive pulmonary disease) and cardiovascular symptoms (*e.g.*, congestive heart failure,

ischemic heart disease, and myocardial infarction) (Delfino et al., 2009; Künzli et al., 2006; Liu et al., 2015; Rappold et al., 2012; Reid et al., 2016; Viswanathan et al., 2006). It has also been linked to higher rates of dementia (B. Zhang et al., 2023; Z. Zhang et al., 2023). And experts have also found that greater exposure to wildfire smoke and excessive heat during the month before conception and the first trimester of pregnancy is linked with greater risk of both short- and long-term health problems (Evans et al., 2022; Khalili et al., 2025). Researchers estimated that between 2008 and 2018 more than 50,000 premature deaths were caused by California wildfire smoke (Connolly et al., 2024). As climate change intensifies, scientists predicted that wildfire smoke could cause approximately 700,000 excess deaths between 2025-2055 (Qiu et al., 2025).

Wildfires in the WUI can lead to other harmful public health impacts due to increased exposure to toxic contaminants from burned buildings, cars, electronics, and more. Buildings and infrastructure often contain plastic materials, heavy metals, benzene, and carcinogenic gases. These toxic chemicals pose a threat in the burn area and they can travel long distances.

During the 2018 Camp Fire that burned 19,000 structures, the smoke caused dangerously high levels of air pollution in the Sacramento Valley and Bay Area and the California Air Resources Board found that high levels of heavy metals like lead and zinc traveled more than 150 miles (CARB, 2021). And unsafe levels of lead, arsenic, and other dangerous metals have been documented in and downwind of the Eaton and Palisades fire footprints (Champlin, 2025; H. Smith & Briscoe, 2025).

B.4-24 Cont.

Families living or working in or near the burn area also risk increased exposure to hazardous chemicals. After the Eaton Fire, some families with no other options returned to live in homes deemed “uninhabitable” by insurance companies, surrounded by toxic debris (Vives & Castillo, 2025). Almost 50% of schools where students had returned to in the Pasadena Unified School District had elevated levels of lead and arsenic in their soils due to toxic ash, which can have damaging effects on the nervous system, cardiovascular system, and kidneys (Haggerty & Briscoe, 2025). And farmworkers often have to continue working while fires burn and pollutants fill the air, or risk not getting paid (Herrera, 2018; Kardas-Nelson et al., 2020; Parshley, 2018). Wildfire victims have also had to deal with lack of funding and support for cleanup as well as improper cleanup, “adding to the trauma” they have already endured (Briscoe, 2025; Briscoe et al., 2025).

Service workers also face increased risk. Firefighters are suffering disproportionately high rates of cancer and other serious diseases (Dreier, 2025; Hwang et al., 2023; Johnson & Lam, 2023) as well as mental health issues due to extended fire seasons and working extended shifts away from their families (Ashton et al., 2018; Bransford et al., 2018; Del Real & Kang, 2018; Greene, 2018; Gutierrez, 2018; Simon, 2018). And firefighters who fought blazes in the LA wildfires had high levels of lead and mercury in their blood, (Hernandez, 2025). Fire cleanup workers also risk increased exposure to harmful chemicals; they often do not use appropriate protective gear as they remove toxic debris from the burn area (Haggerty, 2025).

Scientists are continuing to uncover the devastating health impacts of wildfires in the WUI. In a study that included more than 1,100 participants that were affected by the 2023

wildfires in Maui, Hawai'i, researchers found that six to 14 months after the wildfires more than 20% of participants had reduced lung function and almost 50% had clinical symptoms of depression (Juarez et al., 2025). The majority of participants reported food insecurity, economic hardship, and displacement due to the wildfires (Juarez et al., 2025), and in the month of the wildfires, the suicide and overdose rate doubled (Purtle et al., 2025). Other experts attributed more than 400 additional deaths to the LA wildfires, likely due to poor air quality, delays in health care, and other factors (Paglino et al., 2025).

B.4-24 Cont.

Science unequivocally shows that California wildfires in the wildland urban interface are increasing negative health impacts within and beyond their footprint. Proper analyses and mitigation of the Project's impacts on wildfire ignition, wildfire spread, and the negative health impacts associated with wildfire are needed. A subsequent EIR is needed to analyze and mitigate these impacts.

E. The RPDEIR Should Disclose That New Residents and Owners Will Likely Not Be Able to Insure Their Homes Against Wildfire Risk.

California is facing an insurance crisis. Many private insurers are leaving California or otherwise refusing to insure homes built in the wildland-urban interface (like the Proposed Project), and this has resulted in an addition of approximately one half of a *trillion* dollars of added assets being "covered" under California's FAIR Plan, which was designed to be a wildfire insurance of last resort for homeowners otherwise unable to obtain coverage (and is owned and managed by the State) (Saleh, 2025). In turn, this has caused a major uptick in premiums on the State's FAIR Plan, which has led some homeowners to forego wildfire insurance altogether. (*Id*.) And many of the homeowners that have been able to retain private wildfire insurance have been unable to actually be reimbursed through their insurers' claims process (Overland, 2025 [discussing litigation filed by victims of the recent fires in Los Angeles against their insurer for failing to pay out valid claims resulting from those fires]).

B.4-25

A subsequent EIR should therefore analyze whether the residences contemplated will be insurable through private insurers or will require access to the California FAIR Plan and what each home's premium ought to be. (*Laurel Heights Improvement Assn.,* 47 Cal. 3d at 392.) In undertaking that analysis, the Project proponent must also take into account that many private insurers have a documented practice of underinsuring homes when contracting for wildfire insurance, and that this practice of underinsurance has resulted in many homeowners receiving far less than their home's worth from their insurer after their homes are destroyed by wildfire (Neilson, 2025). Moreover, the RPDEIR should include a mitigation measure requiring the Project proponent to financially cover the wildfire insurance for the homes being sold or otherwise disclose accurate and helpful information regarding the availability of private or public wildfire insurance, the costs thereof, and the risks inherent in obtaining such insurance and, more importantly, in foregoing to do so when advertising and selling the residences contemplated under the Proposed Project and Specific Plan. (14 C.C.R. § 15021(a).) In fact, the State is working on preparing and publishing a tool that would help facilitate that process (Rahim, 2025).

F. More Ignitions Due to Development in Fire Zones Increases Firefighting and Economic Costs and Strain on Firefighters.

The RPDEIR fails to consider the impacts of wildfire on firefighters and costs. As noted above, the vast majority of wildfires in California are ignited by people in poorly-planned development in high fire prone areas (Balch et al., 2017; Keeley & Syphard, 2018). More development in high fire hazard areas will increase ignitions and associated fire suppression, damage, and recovery costs. More wildfire in the wildland urban interface is also harming firefighters' health and well-being.

The RPDEIR lacks information regarding how more development in fire-prone areas will necessitate significant firefighting costs from both state and local authorities. The California Department of Forestry and Fire (CalFire) is primarily responsible for addressing wildfires when they occur, and its costs have continued to increase as wildfires in the wildland-urban interface have grown more destructive. The cost of fire suppression in areas managed by CalFire has skyrocketed from $114 million in the 2000-2001 fiscal year to close to $3 billion for the 2020-2021 and 2021-2022 fiscal years combined (CalFire 2022). The Legislative Analyst's Office (LAO) reported that CalFire used an estimated $3.3 billion for wildfire protection and suppression in the 2022-2023 fiscal year (LAO 2023). This does not include the cost of lives lost, property damages, or clean up. B.4-26

Economic costs of wildfires are also skyrocketing. Researchers found that the 2018 California wildfires, which included the Camp Fire that burned through Paradise and the Woolsey Fire that burned through Ventura and Santa Barbara, resulted in $148.5 billion in in capital losses, health costs related to air pollution exposure, and indirect losses due to broader economic disruption cascading along regional and national supply chains (D. Wang et al., 2021). Experts estimate the costs of the 2025 Los Angeles fires could be between $250 and $275 billion when considering damage to homes, businesses, and infrastructure and the costs of health impacts, evacuation, cleanup and recovery, and economic losses (Danielle, 2025). Costs could continue to rise as we learn more about the extent of the damage and the long-term impacts of exposure to toxic air pollutants, contaminated waters and soils, and the trauma of fleeing wildfires and/or losing homes, schools, and communities.

Climate change is increasing extreme weather and fire conditions, which, in combination with poorly planned development, has led to more ignitions and longer fire seasons that are increasing strain on over-burdened firefighters and first responders. According to Captain Michael Feyh of the Sacramento Fire Department, California no longer has a fire season (Simon, 2018); wildfires in California are now year-round because of increased human ignitions in fire-prone areas. Emergency calls to fire departments have tripled since the 1980s (Gutierrez & Cassidy, 2018), and firefighters (and equipment) are being spread thin throughout the state. Firefighters often work 24- to 36-hour shifts for extended periods of time (often weeks at a time), and are being kept away from their homes and families for more and more days out of the year (Ashton et al., 2018; Bransford et al., 2018; Del Real & Kang, 2018; Greene, 2018; Gutierrez, 2018; Simon, 2018). In addition, the firefighting force often must rely on volunteers to battle fires year-round. At its peak, more than 16,000 firefighters from the U.S., Canada, and Mexico, including from prison systems, were combatting the 2025 LA wildfires.

The extended fire season is taking a toll on the physical, mental, and emotional health of firefighters, as well as the emotional health of their families (Ashton et al., 2018; Del Real & Kang, 2018; Simon, 2018). As mentioned above, wildland firefighters are suffering disproportionately high rates of cancer and other serious diseases, likely due to extreme smoke exposure (Hwang et al., 2023; Johnson & Lam, 2023). For those fighting urban conflagrations, exposure to hazardous pollutants are even higher. In a preliminary study conducted on firefighters who fought the LA wildfires, lead and mercury blood levels were five and three times higher compared to firefighters who fought vegetation wildfires (Hernandez, 2025). In addition, the physical and mental fatigue of endlessly fighting fires and experiencing trauma can lead to exhaustion, which can cause mistakes in life-or-death situations while on duty, and the constant worry and aftermath that family members endure when their loved ones are away working in life-threatening conditions can be harrowing (Ashton et al., 2018). According to psychologist Dr. Nancy Bohl-Penrod, the strain of fighting fires without having sufficient breaks can impact firefighters' interactions with their families, their emotions, and their personalities (Bransford et al., 2018). There have also been reports that suicide rates and substance abuse have increased among firefighters (Cart, 2022; Greene, 2018; Simon, 2018).

B.4-26 Cont.

III. The RPDEIR Fails to Adequately Disclose, Analyze, and Mitigate the Project's Adverse Impacts Related to Greenhouse Gas Emissions.

The Center and CNPS hereby incorporate our May 21, 2025 comments on the Draft Supplemental Environmental Impact Report (Exhibit C). Although the County has rescinded the Project's entitlements and decertified the prior EIR, the RPDEIR's greenhouse gas (GHG) analysis retains flaws present in the 2025 Draft Supplemental EIR. The GHG emissions estimate relies on long-outdated 2016 greenhouse gas emission modeling, then adds and subtracts so many GHG sources and sinks that it is unclear why the EIR relied on the 2016 CalEEMod at all. Although the RPDEIR now estimates the Project's emissions at 247,101 MTCO2e/year – significantly higher than the 157,642 MTCO2e/year estimate provided in the 2019 EIR – the RPDEIR improbably concludes that the Project's mitigation will offset such a quantity of emissions that the Project will "reduce more GHG emissions than it would emit." While a laudable goal, this is impossible without a significant amount of offsite offsets. Emissions *reductions* throughout the Project, even large ones, cannot result in a Project that emits less than it generates. Finally, the Project's claimed offsets may overestimate the likely reductions. The support for these estimates should be moved from the EIR's appendices into the EIR and be recirculated, along with a GHG emissions estimate based on up-to-date and available modeling tools.

B.4-27

A. The RPDEIR Relies on Outdated GHG Modeling.

The RPDEIR discloses that the GHG emissions "are calculated by using the California Emissions Estimator Model (CalEEMod) Version 2016.3.1 and various construction and operational inputs described in the 2019 DEIR Section 5.11." (RPDEIR at 2.2-35.) First, as the Center and CNPS noted in their May 21, 2025 comments, the 2016 version of CalEEMod is nearly ten years old. The EIR should update its GHG emissions calculations with the most current modeling if these calculations are intended to be an accurate disclosure of the Project's GHG emissions, as required by CEQA. This is particularly true, given that the RPDEIR *does* update the model's inputs to account for electrical energy use, solid waste generation, vegetation

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removal, and water use, and to reduce the Project's estimated emissions due to future use of renewable energy and tree planting. (RPDEIR p. 2.2-35, p 2.2-40.) Instead, the EIR applies so many adjustments to the CalEEMod Version 16.3.1 outputs that the basis for the EIR's GHG emissions estimate is unclear. The EIR explains that a 32.4 percent reduction is applied to account for Title 24 Building Code requirements that are more stringent than what was in place in 2016. (RPDEIR at 2.2-40, see also RPDEIR at 2.2-41.) The EIR also explains that the 2016 Version of CalEEMod does not represent current California Air Resources Board (CARB) requirements and guidance. (RPDEIR at 2.2-45.)

Moreover, although the EIR claims to have updated these inputs into CalEEMod, it does not disclose them in the document itself. Burying information in an appendix has been found to frustrate the legally required informational purposes of an EIR. (*Santa Clarita Organization for Planning the Environment v. County of Los Angeles* (2003) 106 Cal.App.4th 715, 723.) This is important to determine whether the Project is overstating the expected emissions offsets from planting trees in the future or understating the amount of lost carbon sequestration caused by removing thousands of acres of native perennial grasslands. (See, e.g., Yap et al., 2023.) While the document later discloses that the carbon sequestration lost due to grassland removal will not be offset by the planting of trees (even after 100 years), the RPDEIR does not explain where it obtained its estimate of 35,123 replacement trees. (RPDEIR at 2.2-39.) Nor does it discuss how the Project will ensure the maintenance and survival of 35,123 trees, the species used, or whether the modeling accounts for tree species and lifespan. Since the Project claims to be a model for zero emission development, it should make its justifications for its zero emissions claims easy for the public to find. The RPDEIR should be recirculated with key information from Appendix D included in the GHG analysis itself.

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The EIR explains that the construction emissions analysis uses the 2016 version of CalEEMod, with construction beginning in 2016 and ending by 2035, even though it is currently 2026, and the Project is not yet approved. (RPDEIR at 2.2-37.) The EIR claims it did not adjust these dates because not doing so results in a "more conservative analysis" given that construction vehicle emissions generally decrease over time as emissions regulations are strengthened. Regardless, the EIR provides a description of construction timing and emissions that cannot possibly occur. Thus, the EIR fails to disclose to the public and decisionmakers the actual, anticipated environmental effects of the Project. An EIR is not supposed to disclose and discuss hypothetical conditions that will not occur; it is supposed to discuss the Project, as it will be implemented. The EIR's GHG analysis fails to do so.

With regard to heavy vehicles and construction vehicles, the EIR does not explain whether or how the 2016 CalEEMod results are representative of the current situation, wherein the Trump Administration has eliminated the authority and incentives for anticipated reductions in the emissions of heavier vehicles. Will construction vehicle emissions reduce over time in the near future at all? It is unclear whether the use of the 2016 CalEEMod outputs, or the use of obviously incorrect construction dates will provide useful and accurate information about the Project's construction emissions. Given that the Project's mitigation and significance thresholds rely on these calculations, the EIR's conclusions about the significance and adequate mitigation of construction emissions may lack substantial evidence.

The EIR claims that its many-times-adjusted 2016 CalEEMod emissions estimate is "conservative" overall, because it does not incorporate the applicable building code and other applicable GHG regulatory mandates. (RPDEIR at 2.2-45.) Again, instead of supporting the EIR's claims that the Project's impacts will not be significant, this claim renders the EIR's emissions estimate suspect and seemingly unsupported.

The RPDEIR should use the Project's actual specifications and enter them into the current CalEEMod model. This analysis should be recirculated for public review and comment. Only then will the EIR have provided the full and accurate disclosure of the Project's anticipated GHG emissions, and the impacts of those emissions, deemed absent by the Court of Appeal.

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B. The RPDEIR is Inconsistent About Natural Gas Prohibitions.

The EIR is inconsistent about the Project's natural gas GHG emissions. The RPDEIR claims, on the one hand, that the Climate Resolve settlement requires the Project's CC&Rs to prohibit the installation of natural gas infrastructure and the use of natural gas for non-essential purposes. (RPDEIR at 2.2-5, 2.2-48 ["Prohibiting fossil fuel fireplaces at the Project would reduce emissions by 11,056 MTCO2e per year."], 2.2-79 ["Prohibit all fireplaces that use fossil fuels…"].) The Settlement limits the use of natural gas both in the Centennial Development and the Grapevine development, which the County touts as evidence of the Project's commitment to being net zero. The summarized Settlement commitments would seem to include natural gas fireplaces, as well. Yet the RPDEIR later discusses natural gas fireplaces as one of the Project's area sources of natural gas emissions. (RPDEIR at 2.2-39.) The EIR next states that the Project's GHG-reducing PDFs cap the Project's natural gas fireplaces not at zero, but at 13,954 fireplaces. Given that the Project's new residential units would undoubtedly provide electric heating, natural gas fireplaces should be considered non-essential to future residents and should be prohibited as provided in RPDEIR at 2.2-5. The emissions of 13,954 fireplaces could and should be eliminated to reduce the Project's GHG emissions and to ensure it is truly "net zero."

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C. The EIR Should Update the GHG Analysis to Include Changes to the Project.

Throughout, the EIR is clear that the 2016 CalEEMod emissions data is included to provide a "conservative estimate" of the Project's emissions, but not the Project's likely *actual* emissions. The EIR claims its analysis does not take credit for its alleged commitment to 50% renewable energy, for changes to the California building code that will result in energy efficient buildings, and for it alleged Settlement commitment to being an "all electric" Project, "with no natural gas." (RPDEIR at 2.2-39.) As a result, the EIR's estimate of GHG emissions is untethered to the Project's actual emissions. It is unknown what the Project's actual emissions will be. Thus, it is unknown what the Project's emissions reductions must be to produce a net zero Project. It is also unknown whether the Project's mitigation will offset the Project's emissions, and, consequently, whether the Project's GHG emissions are significant or not. This, in turn, affects whether the Project must incorporate additional, feasible mitigation, or whether a Statement of Overriding Considerations is necessary or appropriate. It also prevents the GHG analysis from serving as substantial evidence for the County's findings and conclusions. The GHG analysis should be repeated, using the current CalEEMod version, and incorporating the changes to the Project and its commitments in its enforceable mitigation obligations since 2016. An EIR is meant to be a document of accountability. This purpose cannot be met by a GHG analysis that

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provides a "conservative" rough estimate the County then claims is higher than will actually be implemented.

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D. The RPDEIR's Emissions Reductions Estimates are Astronomical.

The RPDEIR's claims that the Project will "reduce more GHG emissions than it would emit" (RDEIR at 2.2-51) appear to rely on mathematical sleights of hand. Unless the Project is relying in very large part on offsite mitigation, this goal is unachievable. The EIR claims that, not only in the Project "net zero," but that it is beyond net zero. This means, that even with construction and operation of a new City of 60,000 people and millions of vehicle miles travelled (VMT) for residents to reach employment, services, and entertainment 30-75 miles away in Los Angeles and Bakersfield, that *all* of the Project's emissions have been offset. Onsite reductions through reliance on renewable energy, onsite generation, energy conservation, VMT reductions, green building code reductions, and other means are just that – reductions. They cannot bring the Project below a level of zero emissions. Yet the EIR claims just that.

For example, the EIR claims that mobile source electrification, which will ultimately result in one residential charger in each dwelling unit, will reduce GHG emissions by 51,462 MTCO2e per year. (RPDEIR at 2.2-47.) This assumes that each charger will reduce emissions by an estimated 2.66 MT per year. While this estimate may be appropriate at full 3-year buildout of the Project, after all of the Project's residential chargers have been installed, it is a gross overestimate for the Project's first operational years when only a small fraction of the chargers have been installed. This reduction is particularly important, as it apparently accounts for 20% of the Project's emissions/reductions.

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The EIR further claims that the installation of electric vehicle chargers in the onsite commercial areas will reduce emissions by nearly another 50% beyond that amount, 72,428 MTCO2e per year. This seems like a very large estimate, given that residential development will likely predate most of the Project's commercial development, and given that Project residents will likely utilize their home EV chargers much more than EV chargers located in commercial areas. (RPDEIR at 2.2-48.) Most commercially-available EV chargers charge customers for use.

The Project also appears to take credit for prohibiting fossil fuel fireplaces, to the tune of 11,056 MTCO2e/year. However, if the Project is prohibiting fireplaces to begin with, there are no emissions to be avoided. Additionally, the EIR does not appear to contain measures that will prevent the later installation of backyard firepits and other types of fossil-fueled devices. Inspections at time of sale may catch or prevent the replacement of indoor appliances but cannot prevent temporary or even long-term outdoor installations. Thus, the EIR may not be able to rely on this large reduction.

Project calculations further take credit for "no natural gas infrastructure at the Grapevine." A prohibition on the use of greenhouse gas infrastructure in Tejon Ranch's Grapevine development is a positive development, but it is unclear whether this commitment is truly "additional" as required by the Health & Safety Code to be considered a GHG offset for the Project. The Grapevine development is already under construction, and apartments have been available since 2015. This 11,225 MTCO2e is suspect.

The Project's transportation reductions claim to total approximately 18,037 MTCO2e per year, the equivalent of removing over 3,900 gas-powered cars from the road for the year. (RPDEIR at 2.2-50.) However, it is unclear how the claimed PDFs will achieve this level of reductions through a transportation demand association and pedestrian/bicycle connectivity throughout the Project. Neither the PDFs nor the text of the mitigation measures appear to require or set aside funding for these undisclosed strategies.

Another 13,208 MTCO2e in claimed annual reductions is based on the provision of truck charters at the Tejon Ranch Commerce Center. (RPDEIR at 2.2-49.) While the Center appreciates efforts to encourage truck electrification, the EIR does not explain the number of electric trucks currently visiting the Tejon Ranch Commerce Center, or where the 13,208 number was derived. The estimated emissions reductions for this item may be overstated, given current market conditions.

The EIR also claims that the Project's restoration of a small amount of oak woodland and the planting of 322 trees will reduce Project emissions by 74 MTCO2e. (RPDEIR at 2.2-51.) As the average tree sequesters 50-100 pounds of carbon dioxide each year, this estimate appears to lack support.

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E. Offsite EV Chargers Must Be Maintained.

According to Table 2.2-10, the Project claims it will offset roughly 86,000 MTCO2e per year through the use of offsite chargers. The current EV charging network is beset by frequent outages and maintenance challenges. The Project must be conditioned to require constant monitoring and maintenance of these chargers so that their claimed offsets may actually be realized. Without strict conditions and enforcement, these offsets – equal to one-third of the Project's emissions – will not be realized.

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IV. Conclusion.

Thank you for the opportunity to submit comments. The Center urges the County to complete a revised and recirculate a complete EIR for public review that provides adequate analyses and mitigation of the Project's impacts to biological resources, wildfire risk, and greenhouse gas emissions.

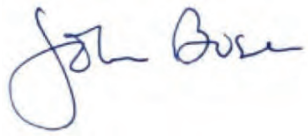
Please include the Center on your notice list for all future updates to the Project and do not hesitate to contact the Center or CNPS with any questions at the emails listed below.

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Sincerely,



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Cont.

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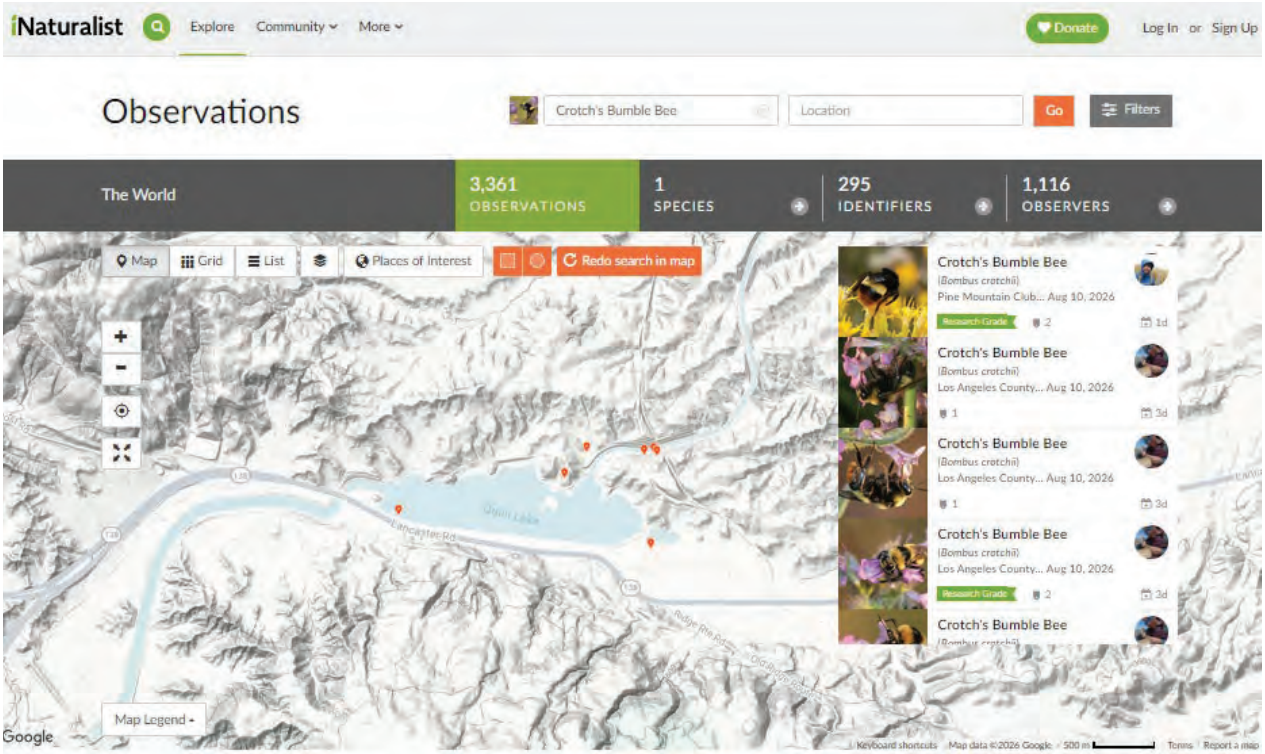
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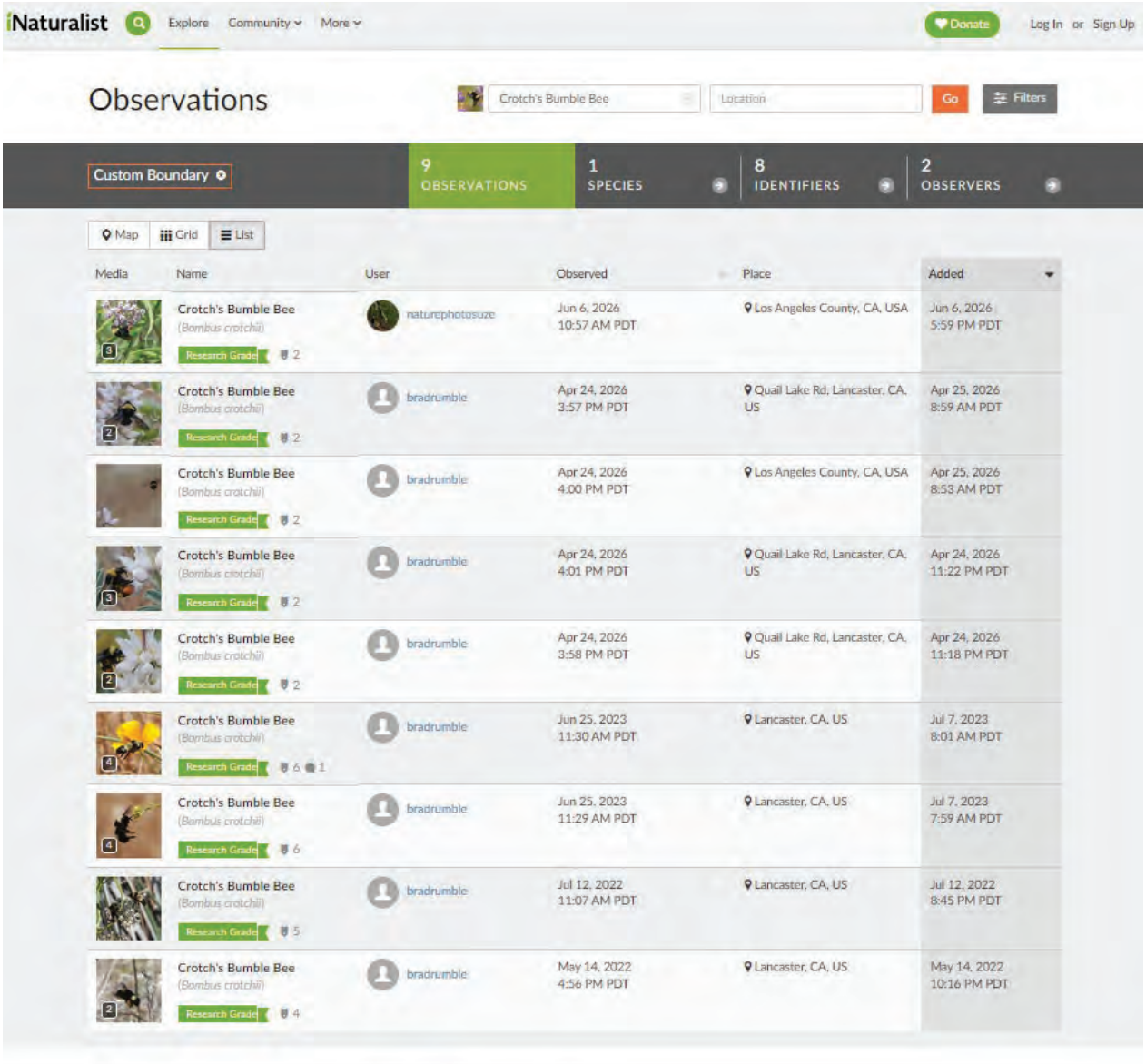
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Exhibit A



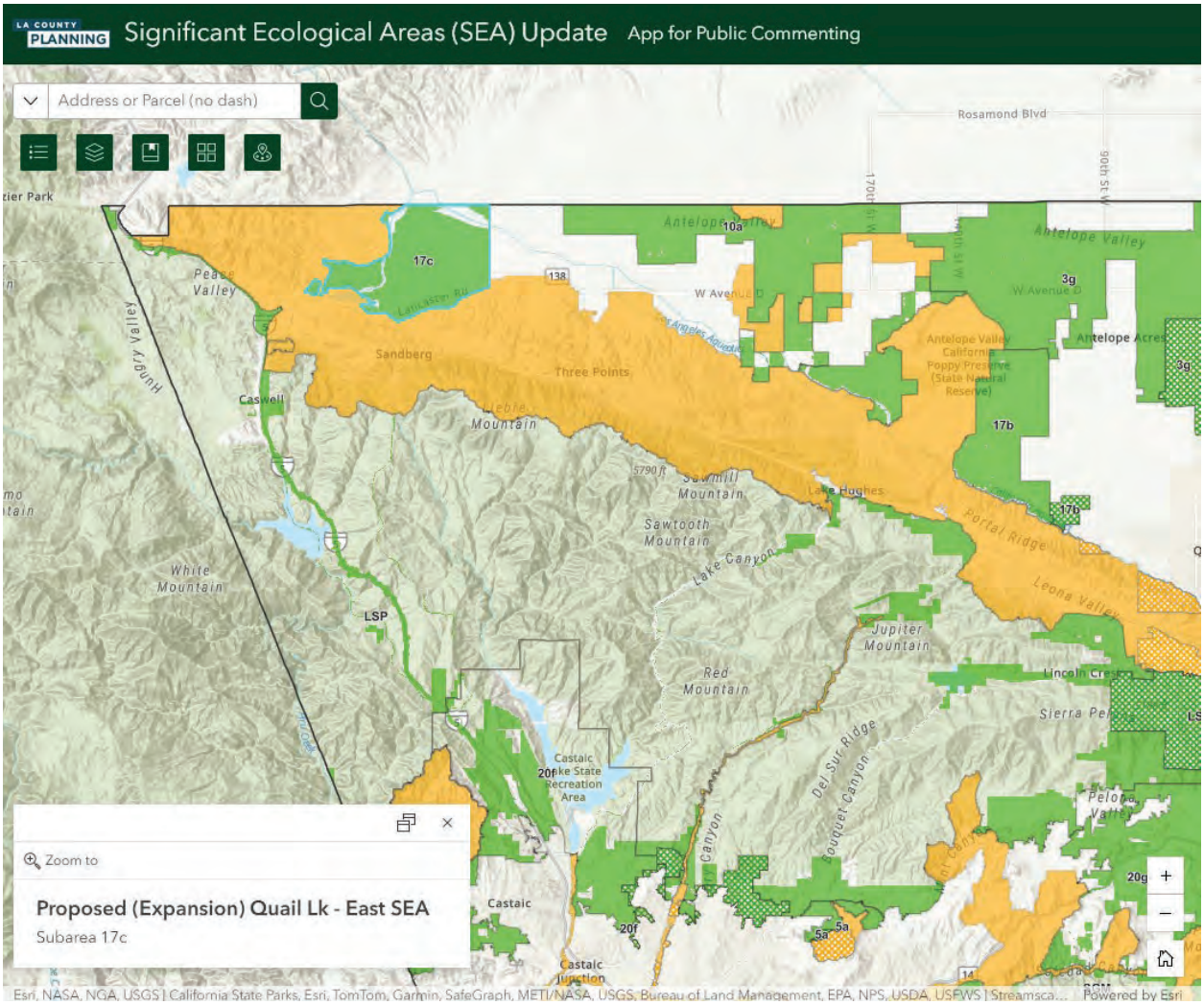
iNaturalist Observations Map of Crotch's bumble bee near Quail Lake. The red icons mark the approximate locations where the species was observed. Available at https://www.inaturalist.org/observations?subview=map&taxon_id=271451 (Accessed August 13, 2026).



iNaturalist Observations List of Crotch's bumble bee near Quail Lake. Available at https://www.inaturalist.org/observations?nelat=34.783912247&nelng=-118.709963962&subview=table&swlat=34.761276013&swlng=-118.781809979&taxon_id=271451 (Accessed August 13, 2026).

Exhibit B

Significant Ecological Areas Update
Available at:
https://experience.arcgis.com/experience/a135f419038441fe944ff9eb980d501f/page/Home?views=View. (Accessed August 7, 2026).



San Andreas SEA (Subareas 17b – 17d)

Proposed:

Substantially expand and refine the boundaries of the San Andreas SEA to incorporate large, ecologically intact landscapes associated with the San Andreas Rift Zone and adjacent desert – montane transition areas. Proposed changes include two minor boundary adjustments: 17d extends the boundary eastward to Highway 14 west of Lake Palmdale, incorporating a critical movement barrier with high potential for enhanced connectivity. The proposed expansion also addresses a long-standing gap between the San Andreas SEA and Joshua Tree Woodlands SEA and incorporates extensive open space that remains lightly developed. Portions of the landscape

extend toward Tejon Ranch and include contiguous, high-quality habitat that was previously excluded.

Two larger areas are proposed for expansion to more fully include the flatter portions of the open grassland and wildflower field habitats protected within the Antelope Valley California Poppy State Reserve: Subarea 17b, which forms a broader band surrounding the existing SEA, and Subarea 17c, which extends east and northeast of Quail Lake to include extensive, undisturbed habitats of the southern Tehachapi Mountains.

Many of the grassland species—particularly birds—for which this SEA was established, prefer flat terrain rather than hilly or mountainous topography. Examples include special-status species such as Swainson's hawk, short-eared owl, burrowing owl, and tricolored blackbird, as well as species of local interest such as wintering flocks of mountain bluebirds, horned larks, and vesper sparrows, breeding western meadowlarks, and a variety of wintering raptors. Expanding the SEA to include these flat areas would help ensure adequate habitat as development continues to expand in the Antelope Valley. Subarea 17c east of Quail Lake also contains several areas of high rare plant species richness, among the highest in the county, and supports regular flyovers by California condors.

Primary Ecological Justifications:

- **Criterion A:** An exceptional diversity of special-status species is found within the San Andreas SEA, including pond turtle (*Actinemys* sp.; species-level identification uncertain in the contact zone between *A. marmorata* and *A. pallida*) in small montane wet meadows (sag ponds), burrowing owl, Swainson's hawk, California condor, Joshua tree woodland (throughout), tricolored blackbird (throughout), vernal pool fairy shrimp, and numerous sensitive plant taxa (e.g., *Astragalus leucolobus*, *Calochortus palmeri* var. *palmeri*, *Navarretia setiloba*).
- **Criterion B/C:** Supports diverse and often declining plant and wildlife assemblages, including rare grassland birds, uncommon herpetofauna and mammals, an exceptional diversity of locally rare plants, and high-value riparian wildlife communities with strong restoration potential.
- **Criterion D:** Constructed wetlands and riparian areas provide critical habitat in an otherwise arid landscape, acting as focal resources for wildlife.
- **Criterion E:** Represents the western edge of Joshua tree woodland (clonal form), extensive sandy wash systems with scattered riparian elements (including large cottonwoods), rare riparian woodlands in arid settings, and one of the most significant remaining native grassland systems in Los Angeles County.
- **Criterion F:** Encompasses large, remote, and largely undeveloped landscapes with little recent human disturbance, supporting wide-ranging species and intact ecological processes.
- **Criterion G:** With the recommended adjustments, this SEA will better function as a major regional connectivity hub, facilitating wildlife movement between the Antelope Valley, San Gabriel Mountains, and Tehachapi Mountains, including crossings over the California Aqueduct and Interstate 5. The area can also accommodate climate-driven range shifts and lateral movement across desert, grassland, and montane habitats.

Exhibit C

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May 21, 2025

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ATTN: Mr. Jodie Sackett, Subdivisions Section
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320 W. Temple Street, 13th Floor
Los Angeles, CA 90012

Re: Draft Supplemental Environmental Impact Report for the Centennial Specific Plan Project; Project No. 02-232; Specific Plan Amendment No. RPPL2024001827; SCH No. 2004031072

Dear Mr. Sackett,

These comments are submitted on behalf of the California Native Plant Society and the Center for Biological Diversity. These nonprofit environmental organizations have monitored and participated in the County's processing of the Centennial Specific Plan (Project) for decades to advocate for the protection of the Project site's unique biological resources, the reduction of greenhouse gases, and the mitigation of wildfire risk. As the County is well-aware, the organizations litigated the County's 2019 certification of an environmental impact (EIR) report for the Project. This EIR was deemed inadequate under the California Environmental Quality Act (CEQA) and ordered decertified by the Los Angeles Superior Court.

While the organizations appreciate the Project's exploration of onsite energy generation and microgrids, the County cannot certify a Supplemental Environmental Impact Report (SEIR) until the status of the underlying EIR is resolved by the Court of Appeal. Moreover, the SEIR's analysis and mitigation of wildfire and greenhouse gas impacts remains inadequate. The SEIR should be revised to incorporate information necessary to informed decision-making, outlined in greater detail below, and recirculated.

I. The Organizations Request an Extension of the Comment Period Due to the County's Failure to Notify Interested Parties.

Although the SEIR claims the Notice of Preparation was provided "to all interested agencies, organizations, and individuals," (SEIR at 1-15) neither the California Native Plant Society nor the Center for Biological Diversity received notice of the SEIR's

preparation or release. Given the organizations' continued engagement in the County's processing of the Project through the submission of multiple comment letters, appearances at all hearings, and even the litigation of the EIR, the organizations are interested parties that should have been notified of the SEIR's preparation and availability. While the organizations learned of the SEIR independently, they did so recently, with insufficient time to analyze the 2,000+ pages of new and technical information contained within the SEIR. Accordingly, the organizations request additional time to complete their review of the SEIR and its underlying reports.

II. The County May Not Rely on a Supplemental Environmental Impact Report, Given that the Underlying EIR was Ordered Decertified.

As the Supplemental Environmental Impact Report (SEIR) acknowledges, the California Native Plant Society and Center for Biological Diversity challenged the County of Los Angeles' 2019 adoption of the environmental impact report for the Centennial Specific Plan under CEQA. Ultimately, the Los Angeles Superior Court found the EIR was inadequate with respect to greenhouse gas and wildfire analysis. (Los Angeles Superior Court Case No. 19STCP02100.) The Court signed a judgment and issued a writ ordering the County to decertify the EIR until its deficiencies were corrected. The Judgment ordered that a writ be issued requiring the County to:

a. Set aside their approvals of the Centennial Project, including the Centennial Specific Plan (Project No. 02-232-(5)), General Plan Amendment No. 02-232-(5), the Vesting Tentative Parcel Map No. 060022-(5), Conditional Use Permit No. 02-232-(5), Development Agreement No. RPPL2016-003940-(5) and Zone Change No. 02-232-(5), and any other associated approvals authorized by Respondents;

b. Set aside their certification of the Final Environmental Impact Report, State Clearinghouse No. 2004031072, prepared in connection with the Centennial Project ("FEIR");

c. Set aside their Findings, the Statement of Overriding Considerations, and the Mitigation Monitoring and Reporting Program adopted in connection with the Centennial Project; and,

d. Suspend any and all specific project activity or activities pursuant to the project approvals that could result in an adverse change or alteration to the physical environment, unless and until Respondents comply with the requirements of the California Environmental Quality Act.

Thus, there is no underlying, certified EIR upon which the Supplemental EIR may depend. While the County appealed the superior court's order that it must decertify the EIR, the California Native Plant Society and Center for Biological Diversity cross-appealed. The case has been argued and submitted, with a Court of Appeal decision expected at any time. Accordingly, even if the County's certification of the underlying EIR is upheld by the Court of Appeal, that has not yet occurred. The County must prepare and circulate a free-standing environmental document addressing the Project's new components before it may lawfully move forward with them.

III. The SEIR Fails to Adequately Disclose, Assess, And Mitigate the Project's Impacts to Wildfire Risk.

Wildfires are a natural and necessary process in many of California's ecosystems, and many areas need beneficial fire to restore ecosystem health and cultural connection to the land. However, the last decade of unprecedented wildfires in the wildland urban interface (WUI)—where homes extend into the natural landscape—has been devastating for people and wildlife. Poor land-use planning plays a primary role in destructive wildfire.

Since 2015 California wildfires have killed more than 230 people and destroyed more than 75,000 structures in the wildland urban interface (WUI), where homes extend into the natural landscape. Hundreds of thousands of people have had to evacuate their homes and endure power outages, and millions of people have been exposed to unhealthy levels of smoke and toxic air, soil, and water pollution. Meanwhile costs for fire suppression, loss of life, medical expenses, property damage, and indirect economic losses are in the hundreds of billions of dollars.

On January 7, 2025, the world watched Los Angeles go up in flames. In a matter of just three days, fires killed at least 29 people, destroyed more than 16,000 structures, and burned more than 34,000 acres of shrublands and oak woodlands. Post-fire rains caused flooding, mudslides, and debris flows, which threatened communities and polluted nearby waters. Toxic debris plagues the landscape, with dangerously high levels of lead, arsenic, and other metals in soils within and near the fire footprint.

Costs of wildfires are skyrocketing. Researchers found that the 2018 California wildfires, which included the Camp Fire that burned through Paradise and the Woolsey Fire that burned through Ventura and Santa Barbara, resulted in $148.5 billion in capital losses, health costs related to air pollution exposure, and indirect losses due to broader economic disruption cascading along regional and national supply chains (Wang et al., 2021).

Experts estimate the costs of the 2025 Los Angeles fires could be as high as $432 billion when considering property and capital losses, wages lost by local businesses and employees, and a decline in county-level GDP (Li & Yu, 2025). These estimates do not include the costs of health impacts; costs could continue to rise as we learn more about the extent of the damage and the long-term impacts of exposure to toxic air pollutants, soil pollutants, contaminated water, and the trauma of fleeing wildfires and/or losing homes, schools, and communities.

The science is irrefutable. Almost all destructive wildfires are accidentally ignited by humans or human infrastructure near roads and development (Balch et al., 2024; Chen & Jin, 2022; Syphard, Rustigian-Romsos, et al., 2019). Development in fire-prone landscapes increases ignition risk while climate change is amplifying fire conditions. Meanwhile, developers make money by selling risky homes, leaving the burden of recovery on homeowners and taxpayers. Yet the SEIR and associated studies fail to adequately assess and mitigate the Project's impacts to wildfire risk and instead downplays the Project area's existing conditions and creates a false sense of security with minimal and inadequate mitigation.

CEQA requires an EIR to identify and analyze a project's significant environmental impacts, including those impacts caused or exacerbated "by bringing development and people into the area affected." (Pub. Resources Code, §§ 21002, 21002.1, subd. (a); CEQA Guidelines, § 15126.2, subd. (a).) The impacts of development in areas prone to wildfire specifically require consideration: "the EIR should evaluate any potentially significant direct, indirect, or cumulative environmental impacts of locating development in areas susceptible to hazardous conditions (e.g., floodplains, coastlines, *wildfire risk areas*), including both short-term and long-term conditions, as identified in authoritative hazard maps, risk assessments or in land use plans addressing such hazard areas." (CEQA Guidelines, § 15126.2, subd. (a), emphasis added.)

In 2018, the State officially recognized that introduction of development in the WUI increases ignition risk. (OPR 2018 Final Statement of Reasons – Update to CEQA Guidelines Checklist]; see also *Clews Land & Livestock, LLC v. City of San Diego* (2017) 19 Cal.App.5th 161, 193 [recognizing potential for significant environment effects when project brings new development to a wildfire prone area].) Moreover, as discussed in a 2021 Center Report, "*Built to Burn: California's Wildlands Developments are Playing with Fire*," policymakers must reckon with California's wildfire history and acknowledge that reckless land-use policies are increasing wildfire risk and putting more people in harm's way (Yap et al., 2021).

Recently, a California Court of Appeal blocked development over wildfire concerns because the county failed to assess wildfire risk. (See *People ex rel. Bonta v. County of Lake* (2024)105 Cal.App.5th 1222, 1235 [finding that EIR must sufficiently

discuss the project's potential adverse effect of human-cause ignitions and analyze in some detail how the project's design or mitigation measures alleviates such risks, and lead agency failed to utilize industry standard modeling tools or appropriate methodologies for its conclusory findings]). The SEIR here fails to do this.

A. The SEIR is misleading and inaccurately portrays the Project area's wildfire risk.

The SEIR is misleading and misrepresents the true depth and extent of wildfire risk the proposed Project imposes. The SEIR downplays wildfire risk in the Project area by referencing that the 76% of the Project area's vegetative cover is flat to rolling grassland, arguing that "[w]hile grassland fires may spread rapidly and are influenced heavily by wind, fires in shrub and forest vegetation involve higher intensity fire behavior, present greater risk to structures, and often more difficult control measures" (SEIR at 3.2-19). However, the SEIR fails to provide substantial evidence to support such claims. In fact, the best available science shows that "[t]he 10 fastest fires [in the U.S.] were in grassland-dominated vegetation, which highlights the role of fine, flashy fuels and low wind friction" and "[f]ast fires are also the most destructive and deadly ones" (Balch et al. 2024). The SEIR fails to accurately describe wildfire risk in the Project area while attempting to instill a false sense of security.

The SEIR fails to adequately discuss the role of climate and climate change as it pertains to wildfire risk in the Project area. Although the SEIR acknowledges that "[t]ypically the highest fire danger in southern California coincides with Santa Ana winds" (EIR at 3.2-17) and that the Project area is "occasionally subject to strong Santa Ana winds" (EIR at 3.2-18), the EIR fails to disclose that wildfire risk is now year-round, especially as climate change intensifies.

Winds drive the fastest, deadliest, and most destructive wildfires in the U.S. (Balch et al., 2024). And researchers have found that fires are spreading faster. Between 2001 and 2020 the maximum daily growth rate of wildfires in the U.S. more than doubled, and California fires grew almost 400% faster (Balch et al., 2024). Experts suggest that this trend could be due to warming temperatures, habitat conversion to more flammable vegetation (i.e., nonnative grasses), and/or the co-occurrence of high winds with increasing human-related ignitions (Balch et al., 2024). Although the winds do not ignite the fires, ignitions in the WUI often coincide with strong wind events (Abatzoglou et al., 2018; Hantson et al., 2022; Mietkiewicz et al., 2020). Almost always ignited by humans and human infrastructure in dry shrublands and grasslands, these wildfires spread quickly and are difficult to contain during windy conditions, which amplifies their negative impacts to people and ecosystems (Hantson et al., 2022). The EIR downplays the significance of the Project area being located in a fire-prone area where strong wind events are known to occur.

Climate change is exacerbating extreme weather conditions and wildfire impacts (Williams et al., 2019). The number of days with extreme fire weather conditions in California has doubled since 1980, and further climate change will amplify that trend (Goss et al., 2020). Hotter and drier conditions combined with later and shorter rainy seasons are making the landscape more conducive to wildfire ignitions and spread while lengthening the fire season (Dong et al., 2022; Goss et al., 2020; Luković et al., 2021; Ma et al., 2021; Swain, 2021). Continued climate change and increasing fire conditions will lead to more intense and more destructive wildfires (MacDonald et al., 2023). The SEIR fails to adequately assess the Project's wildfire risk.

B. The SEIR fails to adequately mitigate the Project's wildfire risk.

The science clearly shows that placing any new human presence in high fire-prone areas inevitably increases ignition risk, yet the SEIR relies very minimally on Chapter 7A of the California Building Code, internal sprinklers, a 100-200-foot fuel modification zone, and three to four fully equipped fire stations to reduce the Project's wildfire risk impacts to less than significant (SEIR at 3.2-94). However, these measures do not guarantee safety when (not if) a fire burns through the area. While fire-resistant measures can reduce wildfire risk, they cannot make structures or communities fireproof. In an analysis that included more than 40,000 structures exposed to wildfire between 2013 and 2018 in California, many structures deemed "firesafe" were destroyed. And while an analysis conducted in the aftermath of the 2018 Camp Fire showed that new building codes improved home survival, with 38.5% of homes built to code undamaged compared to 11.5% of homes built prior to 2008, 61.5% of the homes built to fire-safety codes were still destroyed (Knapp et al., 2021).

In addition, even if the Project includes "up to four[] fully equipped fire stations" (SEIR at 3.2-94), it is unclear if human and monetary capital will be sufficient to sustain and maintain the new fire stations. There is no requirement that the developer pay for the county's costs of *operating* these stations, nor is there any guarantee that sufficient firefighting personnel will be available. During the LA wildfires in January 2025, firefighters lacked enough personnel and fire engines to keep all communities safe (Fuller et al., 2025; Toohey & Fry, 2025). The personnel cost over the life of the Project (essentially forever) will likely be hundreds of millions of dollars. Funding is already lacking for the increasing costs of fire suppression and property damage from wildfires in California, and the developer is not required to reimburse CalFire for the many millions (or billions) of dollars Cal Fire will likely expend when (not if) Centennial needs to be defended from wildfire. And as mentioned previously, climate change is amplifying extreme weather conditions and wildfire risk (Goss et al., 2020; Swain, 2021; Swain et al., 2018, 2025), which is making it more challenging to protect communities from wildfire. Such information must be analyzed when assessing wildfire risk in the WUI.

The SEIR fails to adequately assess and mitigate the Project's impacts to wildfire risk to less than significant.

Development in and near fire-prone areas should be avoided. If unavoidable, mitigation measures should require structures to have ember-resistant vents, fire-resistant roofs, fire-resistant siding, double-paned windows, and irrigated defensible space immediately adjacent to structures and around communities. External sprinklers (not internal sprinklers, which are proposed in the EIR) with an independent water source could reduce structures' flammability. Rooftop solar and clean energy microgrids could reduce fire risk from utilities' infrastructure during extreme weather. In addition, mitigation measures should include equitably retrofitting existing communities near the Project area with similar fire-resilient measures, providing wildfire personal protective equipment (e.g., N95 masks, air purifiers), and shelter-in-place facilities. Education and awareness for workers, new residents, and nearby communities should be provided and include how to reduce ignition risk. Maintenance and enforcement of ignition reduction measures should be funded and implemented in perpetuity. In addition, developers should be responsible for the insurability of homes and structures as well as recovery and remediation costs when (not if) a fire occurs in or near the Project area.

C. The SEIR Needs to Incorporate Traditional Ecological Knowledge and Indigenous Science Into Its Wildfire Analysis.

The SEIR fails to mention or discuss the area's historical fire regimes and the role Indigenous communities likely played in shaping the fire ecology of habitats in and adjacent to the Project area. Indigenous communities should be included in discourse over climate change and wildfire. They are disproportionately impacted by wildfire. Native Americans were found to be six times more likely than other groups to live in high fire-prone areas, and high vulnerability due to socioeconomic barriers makes it more difficult for these communities to recover after a large wildfire (Davies et al., 2018). In addition, farmworkers, who are majority people of color and often include migrant workers that come from Indigenous communities, often have less access to healthcare due to immigration or economic status. They are more vulnerable to the health impacts of poor air quality due to increased exposure to air pollution as they work. Yet farmworkers often have to continue working while fires burn, and smoke fills the air, or risk not getting paid (Herrera, 2018; Kardas-Nelson et al., 2020b; Parshley, 2018).

Ramos (2022) states, "Indigenous communities have often been marginalized in the sciences through research approaches that are not inclusive of their cultures and histories." Traditional ecological knowledge ("TEK") is often excluded from analyses or distilled to conform to Western science (Ramos, 2022). EIRs and SEIRs, like this one, often fail to acknowledge that Indigenous communities and cultural burning played a role in California's historical fire activity and often only mention previous wildfires in the

area in CalFire records. This perpetuates the exclusion and marginalization of Indigenous communities and TEK. Consultation with local Native Tribes and incorporation of Indigenous science, including but not limited to oral histories, ethnographies (that may include burn scars and charcoal records), and archeological data should be incorporated in fire history analysis. As a society, we need to work toward integrative research that "transcends disciplinary boundaries" and employs a range of methodological options to get a deeper understanding of the relationship between people and ecosystems (Ramos, 2022). Doing so will help inform fire management strategies and mitigation measures that work towards reducing harms of wildfire to people while facilitating beneficial fire for the appropriate ecosystems.

D. Increased development in fire zones magnifies the threat of wildfire and puts more people at risk.

The Project would bring more development and human activity into fire-prone areas, thereby increasing ignition risk and endangering the lives of new residents and existing communities.

According to a report from Governor Gavin Newsom's Office, construction of more homes in the wildland-urban interface is one of the main factors that "magnify the wildfire threat and place substantially more people and property at risk than ever before" (Governor Newsom's Strike Force, 2019). Another 2019 study found that housing and human infrastructure in fire-prone wildlands are the main drivers of fire ignitions and structure loss (Syphard et al., 2019). Sprawl developments extending into habitats that are prone to fire have led to more frequent wildfires caused by human ignitions, like power lines, arson, improperly disposed cigarette butts, debris burning, fireworks, campfires, or sparks from cars or equipment (Alexandre, Stewart, Keuler, et al., 2016; Alexandre, Stewart, Mockrin, et al., 2016; Balch et al., 2017; Bistinas et al., 2013; Keeley et al., 1999; Keeley & Fotheringham, 2003; Keeley & Syphard, 2018; Radeloff et al., 2018; Syphard et al., 2007, 2012; Syphard, Rustigian-Romsos, et al., 2019).

Reckless land-use planning that extends the WUI further into California's fire-prone landscape is causing fires to be more destructive. Almost all destructive wildfires are accidentally ignited by humans or human infrastructure near roads and development (Balch et al., 2024; Chen & Jin, 2022; Syphard, Rustigian-Romsos, et al., 2019). For example, the 2018 Camp and Woolsey fires and 2017 Tubbs and Thomas fires were sparked by powerlines or electrical equipment, and the 2017 Carr fire was caused by car sparks. Exhibit 3.2-6 in the EIR shows the increased ignitions along roads. And although still under investigation, embers from a previous fire ignited by fireworks are suspected to have caused the Palisades Fire, and a spark from a southern California Edison powerline likely caused the Eaton Fire. Placing more homes and people in high fire-prone areas would only increase the potential likelihood of these ignition sources, as has been

documented in multiple scientific studies (Balch et al., 2017; Bistinas et al., 2013; Keeley et al., 1999; Keeley & Fotheringham, 2003; Keeley & Syphard, 2018; Radeloff et al., 2018; Syphard et al., 2007, 2012; Syphard, Rustigian-Romsos, et al., 2019).

E. *Increased development in fire zones disrupts natural fire regimes and harms California's ecosystems and wildlife.*

Wildlife and the habitats they rely on have also suffered from the last decade of unprecedented fires in the WUI. Fragmented populations of sensitive species, like mountain lions, California condors, and San Joaquin kit foxes, are vulnerable to further habitat loss and fragmentation as well as the fires themselves, smoke inhalation and air pollution, post-fire landslides, and toxic runoff. The Project could amplify harms by increasing unintentional human-driven wildfires that disrupt natural fire regimes, further degrade ecosystems, and threaten California's wildlife.

F. *Unintentional wildfires caused by poorly sited development cause poor air quality and harm people.*

As discussed in the Center for Biological Diversity's report, *The True Cost of Sprawl: Bad Planning Harms People, Wildlife and the Climate* (Reid-Wainscoat et al., 2024), unintentional wildfires due to human activity and ill-placed developments lead to increased occurrences of poor outdoor and indoor air quality from $PM_{2.5}$ from smoke (*e.g.*, Phuleria et al., 2005), which can have both acute and long-term health effects that disproportionately affect vulnerable populations, like children, the elderly, those with underlying chronic disease, low-income communities, and communities of color. Hospital visits for respiratory symptoms (*e.g.*, asthma, acute bronchitis, pneumonia, or chronic obstructive pulmonary disease) and cardiovascular symptoms (*e.g.*, congestive heart failure, ischemic heart disease, and myocardial infarction) have been shown to increase during and/or after fire events (Delfino et al., 2009; Künzli et al., 2006; Liu et al., 2015; Rappold et al., 2012; Reid, Brauer, et al., 2016; Viswanathan et al., 2006). In addition, epidemiologists have found that increased exposure to wildfire smoke may also be linked to higher rates of dementia (B. Zhang et al., 2023; Z. Zhang et al., 2023). Researchers estimated that between 2008 and 2018 more than 50,000 premature deaths were caused by California wildfire smoke (Connolly et al., 2024). And wildland firefighters are suffering disproportionately high rates of cancer and other serious diseases, likely due to extreme smoke exposure (Hwang et al., 2023; Johnson & Lam, 2023), as well as mental health issues due to extended fire seasons and working extended shifts away from their families (Ashton et al., 2018; Bransford et al., 2018; Del Real & Kang, 2018; Greene, 2018; Gutierrez, 2018; Simon, 2018).

Increases in wildfire also result in higher frequency and toxicity of smoke exposure to communities in the path of and downwind of the fires. This has become

evident especially with the 2025 LA wildfires, where toxic air pollution and runoff from burned buildings and urban infrastructure are a growing concern. This can lead to harmful public health impacts due to increased air pollution not only from burned vegetation, but also from burned homes, commercial buildings, cars, etc. Buildings and structures often contain plastic materials, metals, and various stored chemicals that release toxic chemicals when burned, such as pesticides, solvents, paints, and cleaning solutions (Weinhold, 2011). During the 2018 Camp Fire that burned 19,000 structures, the smoke caused dangerously high levels of air pollution in the Sacramento Valley and Bay Area, and the California Air Resources Board found that high levels of heavy metals like lead and zinc traveled more than 150 miles (CARB, 2021). Unsafe levels of lead, arsenic, and other dangerous metals have been documented in and downwind of the Eaton and Palisades fire footprints (Champlin, 2025; Smith & Briscoe, 2025).

G. *More unintentional ignitions due to development in fire zones increases firefighting costs and strain on firefighters.*

More development in fire-prone areas will necessitate significant firefighting costs from both state and local authorities. The California Department of Forestry and Fire (CalFire) is primarily responsible for addressing wildfires when they occur, and its costs have continued to increase as wildfires in the wildland-urban interface have grown more destructive. The cost of fire suppression in areas managed by CalFire has skyrocketed from $114 million in the 2000-2001 fiscal year to close to $3 billion for the 2020-2021 and 2021-2022 fiscal years combined (CalFire 2022). The Legislative Analyst's Office (LAO) reported that CalFire used an estimated $3.3 billion for wildfire protection and suppression in the 2022-2023 fiscal year (LAO 2023). This does not include the cost of lives lost, property damages, or clean up. As noted above, the vast majority of wildfires in California are unintentionally ignited by people in poorly-planned development in high fire prone areas (Balch et al., 2017; Keeley & Syphard, 2018). More development in high fire hazard areas will increase unintentional ignitions and associated fire suppression costs.

Climate change is increasing extreme weather and fire conditions, which, in combination with poorly planned development, has led to more ignitions and longer fire seasons that are increasing strain on over-burdened firefighters and first responders. According to Captain Michael Feyh of the Sacramento Fire Department, California no longer has a fire season (Simon, 2018); wildfires in California are now year-round because of increased human ignitions in fire-prone areas. Emergency calls to fire departments have tripled since the 1980s (Gutierrez & Cassidy, 2018), and firefighters (and equipment) are being spread thin throughout the state. Firefighters often work 24- to 36-hour shifts for extended periods of time (often weeks at a time), and are being kept away from their homes and families for more and more days out of the year (Ashton et al., 2018; Bransford et al., 2018; Del Real & Kang, 2018; Greene, 2018; Gutierrez, 2018;

Simon, 2018). In addition, the firefighting force often must rely on volunteers to battle fires year-round. At its peak, more than 16,000 firefighters from the U.S., Canada, and Mexico, including from prison systems, combatted the 2025 LA wildfires.

The extended fire season is taking a toll on the physical, mental, and emotional health of firefighters, as well as the emotional health of their families (Ashton et al., 2018; Del Real & Kang, 2018; Simon, 2018). As mentioned above, wildland firefighters are suffering disproportionately high rates of cancer and other serious diseases, likely due to extreme smoke exposure (Hwang et al., 2023; Johnson & Lam, 2023). For those fighting urban conflagrations, exposures to hazardous pollutants are even higher. In a preliminary study conducted on firefighters who fought the LA wildfires, lead and mercury blood levels were five and three times higher compared to firefighters who fought vegetation wildfires (Hernandez, 2025). In addition, the physical and mental fatigue of endlessly fighting fires and experiencing trauma can lead to exhaustion, which can cause mistakes in life-or-death situations while on duty. The constant worry and aftermath that family members endure when their loved ones are away working in life-threatening conditions can be harrowing (Ashton et al., 2018). According to psychologist Dr. Nancy Bohl-Penrod, the strain of fighting fires without sufficient breaks can impact firefighters' interactions with their families, their emotions, and their personalities (Bransford et al., 2018). There have also been reports that suicide rates and substance abuse have increased among firefighters (Cart, 2022; Greene, 2018; Simon, 2018).

H. *Wildfire disproportionately affects low-income and minority communities.*

Wildfire impacts disproportionately affect low-income and minority communities. As discussed in the Center's 2021 Built to Burn report (Yap et al., 2021):

> Past environmental hazards have shown that those in at-risk populations (*e.g.,* low-income, elderly, disabled, non-English-speaking, homeless) often have limited resources for disaster planning and preparedness (Richards, 2019). Vulnerable groups also have fewer resources to have cars to evacuate, buy fire insurance, implement defensible space around their homes, or rebuild, and they have less access to disaster relief during recovery (Davis, 2018; Fothergill & Peak, 2004; Harnett, 2018; Morris, 2019; Richards, 2019).
>
> In addition, emergency services often miss at-risk individuals when disasters happen because of limited capacity or language constraints (Richards, 2019). For example, evacuation warnings are often not conveyed to disadvantaged communities (Davies et al., 2018b). In the aftermath of wildfires and other environmental disasters, news stories have repeatedly documented the lack of multilingual evacuation warnings leaving non-

> English speakers in danger. (Axelrod, 2017; Banse, 2018; Gerety, 2015; Richards, 2019). Survivors are left without resources to cope with the death of loved ones, physical injuries and emotional trauma from the chaos that wildfires have inflicted on their communities.
>
> Health impacts from wildfires, particularly increased air pollution from fine particulates ($PM_{2.5}$) in smoke, also disproportionately affect vulnerable populations, including low-income communities, people of color, children, the elderly and people with pre-existing medical conditions (Delfino et al., 2009; Hutchinson et al., 2018; Jones et al., 2020; Künzli et al., 2006; Reid, Jerrett, et al., 2016).
>
> Increased $PM_{2.5}$ levels during wildfire events have been associated with increased respiratory and cardiovascular emergency room visits and hospitalizations, which were disproportionately higher for low socioeconomic status communities and people of color (Hutchinson et al., 2018; Jones et al., 2020; Liu et al., 2017; Reid, Jerrett, et al., 2016). Similarly, asthma admissions were found to have increased by 34% due to smoke exposure from the 2003 wildfires in Southern California, with elderly and child age groups being the most affected (Künzli et al., 2006).
>
> Farmworkers, who are majority people of color, often have less access to healthcare due to immigration or economic status. They are more vulnerable to the health impacts of poor air quality due to increased exposure to air pollution as they work. Yet farmworkers often have to continue working while fires burn, and smoke fills the air, or risk not getting paid (Herrera, 2018a; Kardas-Nelson et al., 2020a; Parshley, 2018).

When wildfires burn through communities, they threaten homes, livelihoods, lives, and health. In addition to the immediate impacts of lives and homes lost, evacuations and displacement, impacts from air pollution, soil contamination, lost jobs, and the trauma of escape and recovery extend well beyond the fire footprint and last long after the fire is extinguished. The SEIR fails to adequately assess and mitigate the Project's impacts to wildfire risk and the aftermath of a wildfire when it burns through communities in and near the Project area.

IV. The SEIR's GHG Analysis and Proposed GHG Emission Reduction Measures Fail to Meet CEQA's Requirements.

The Proposed Project is a massive new sprawl development that encompasses over 12,000 acres and nearly 20,000 new dwelling units in the far northern portion of Los Angeles County. (SEIR 2-3.) The Project site is far from existing infrastructure,

communities and job centers making its future residents, visitors and workers largely dependent upon spending large amounts of time in their cars. The previous version of the Project estimated the Project's overall GHG emissions would be 157,642 metric tons of CO_2 every year over the 30-year lifespan of the Project. (SEIR 2-11.) There are also indications that under one "conservative" emissions estimate based on modified EV adoption rates, the Project's GHG emissions could be 223,501 $MTCO_2E$/yr. The EIR further uses an estimate 500,000 MTCOe2/yr from the CR settlement that is never fully explained or detailed in the EIR. While the proposed modifications to the Project have the potential to reduce the Project's overall GHG emissions, full and complete compliance with CEQA requires more. The SEIR's additional GHG emissions analysis and mitigation measures remain incomplete with gaps in the analysis of Project's estimated emissions, the adequacy of proposed GHG emissions reduction measures, and the enforceability of those GHG emissions reduction measures.

A. The Climate Crisis Is a Catastrophic and Urgent Threat to California.

A strong, international scientific consensus has established that human-caused climate change is causing widespread harms to human society and natural systems, and that climate change threats are becoming increasingly dangerous. The Intergovernmental Panel on Climate Change (IPCC), the leading international scientific body for the assessment of climate change, concluded in its 2023 Sixth Assessment Report that: "[u]nsustainable and unequal energy and land use as well as more than a century of burning fossil fuels have unequivocally caused global warming, with global surface temperature reaching 1.1°C above 1850-1900 in 2011-2020." (IPCC, 2023.) The increase in global surface temperature has resulted in sea level rise, increased frequency of extreme weather events, and has resulted in "irreversible losses" at the species and ecosystem levels. (IPCC, 2023.) These findings were echoed in the United States' own 2023 Fifth National Climate Assessment, prepared by scientific experts and reviewed by the National Academy of Sciences and multiple federal agencies. The 2023 Assessment concluded that "[t]he global warming observed over the industrial era is unequivocally caused by greenhouse gas emissions from human activities–primarily burning fossil fuels" and long-term responses include "sea level rise, ice sheet losses, and associated disruptions to human health, social systems, and ecosystems." (Jay 2023.)

In its 2020 update, the U.S. National Research Council concluded that climate change is largely a result of human activity, as "natural causes alone are inadequate to explain the recent observed changes in climate." (NRC 2020.) The additional carbon input from human activities has significantly disturbed the natural carbon cycle, resulting in an imbalance in the system that fosters global climate stability. (NRC 2020.) Based on observed and expected harms from climate change, in 2009 the U.S. Environmental Protection Agency found that greenhouse gas pollution endangers the health and welfare of current and future generations. (74 Fed. Reg. 66496 (Dec. 15, 2009) [U.S. EPA,

Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act; Final Rule].) In 2021, EPA again recognized the critical nature of the climate crisis, stating that: "[t]he changing climate is affecting people's health and livelihoods and damaging infrastructure, ecosystems, and social systems in communities in every region of the nation." (EPA 2021.)

These authoritative climate assessments decisively recognize the dominant role of greenhouse gases in driving climate change. In its 2023 Assessment Report, IPCC stated that "the extent to which current and future generations will experience a hotter and different world depends on choices now and in the near term." (IPCC 2023.) In order to prevent global warming from reaching an irreversible point, policies must be implemented to reach net zero CO_2 emissions and achieve significant reductions in other greenhouse gases. (IPCC 2023.)]

The impacts of climate change will be felt by humans and wildlife. Climate change is increasing stress on species and ecosystems—causing species-level changes in morphology, behavior, phenology, and geographic range shifts, and ecosystem-level changes such as the increasing frequency of extreme weather events, widespread changes in productivity, species interactions, and vulnerability to biological invasions. (Weiskopf 2020.) Climate-change-related local extinctions are already widespread and have occurred in hundreds of species. (Wiens 2016.) Catastrophic levels of species extinctions are projected during this century if climate change continues unabated. (Thomas 2004; Maclean 2011; Urban 2015.) Conservation actions aimed at protecting biodiversity can slow the progression of climate change–the ecosystem services provided by biodiverse ecosystems are an integral part in the balanced functioning of our climate system. (Shin 2021.)

Therefore, immediate and aggressive greenhouse gas emissions reductions are necessary to keep warming well below 2°C above pre-industrial levels. The IPCC Sixth Assessment Report and other expert assessments have established global carbon budgets, or the total amount of carbon that can be burned while maintaining some probability of staying below a given temperature target. According to the IPCC, "[t]he best estimates of the remaining carbon budgets from the beginning of 2020 are 500 GtCO2 for a 50% likelihood of limiting global warming to 1.5°C and 1150 GtCO2 for a 67% likelihood of limiting warming to 2°C." (IPCC 2023 at 19.) Additionally, "[i]f the annual CO2 emissions between 2020-2030 stayed, on average, at the same level as 2019, the resulting cumulative emissions would almost exhaust the remaining carbon budget for 1.5°C (50%), and deplete more than a third of the remaining carbon budget for 2°C (67%)." (IPCC 2023). As of 2023, climate policies by the world's countries would lead to an estimated 2.7°C of warming, and possibly up to 3.4°C of warming, well above the level needed to avoid the worst dangers of climate change. (Climate Action Tracker, Global 2023.)

The United States has contributed more to climate change than any other country. The U.S. is the world's biggest cumulative emitter of greenhouse gas pollution, responsible for 24 percent of cumulative global CO_2 emissions from 1850 to 2022, and the U.S. is currently the world's second highest emitter on an annual and per capita basis. (Friedlingstein 2023 at 5319; World Resources Institute 2023.) U.S. climate policy is wholly inadequate to meet the international climate target to hold global average temperature rise to well below 2°C above pre-industrial levels to avoid the worst dangers of climate change. Current U.S. climate policy has been ranked as "insufficient" by an international team of climate policy experts and climate scientists which concluded: "[w]ithout additional, drastic emission reductions measures, the US will still be far from meeting its domestic climate target, let alone get its emissions onto a 1.5°C trajectory." (Climate Action Tracker, USA 2023.) In its 2018 *Special Report on Global Warming of 1.5°C*, the IPCC—the leading international scientific body for the assessment of climate change—described the devastating harms that would occur at 2°C warming. The report highlights the necessity of limiting warming to 1.5°C to avoid catastrophic impacts to people and life on Earth. (IPCC 2018.) The report also provides overwhelming evidence that climate hazards are more urgent and more severe than previously thought, and that aggressive reductions in emissions within the next decade are essential to avoid the most devastating climate change harms.

In California, climate change will transform our climate, resulting in such impacts as increased temperatures and wildfires, and a reduction in snowpack and precipitation levels and water availability. (Turco 2023.) In response to inadequate action on the national level, California has taken steps through legislation and regulation to fight climate change and reduce statewide GHG emissions. Enforcement and compliance with these steps are essential to help stabilize the climate and avoid catastrophic impacts to our environment. California has a mandate under AB 1279, the California Climate Crisis Act, to achieve net zero GHG emissions by no later than 2045, and achieve and maintain net negative GHG emissions thereafter, and to ensure that by 2045, statewide GHG emissions are reduced to 85% below the level in 1990. (AB 1279 2022.) In 2019, Governor Newsom issued an executive order to leverage state investments to further California's climate goals (Executive Order N-19-19 (2019).) Newsom has continued to issue climate-related executive orders, such as a 2020 order requiring that, by 2035, all passenger vehicles will be zero-emission, in addition to other motor vehicle emission goals. (Executive Order N-79-20 (2020).) Through these bills and orders, California has laid a path that may allow the state to achieve tangible climate solutions, but there is still work to be done.

Although some sources of GHG emissions may seem insignificant, climate change is a problem with cumulative impacts and effects. (*Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin.*, (9th Cir. 2008) 538 F.3d 1172, 1217 ("the impact of

greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis" that agencies must conduct).) One source or one small project may not appear to have a significant effect on climate change, but the combined impacts of many sources can drastically damage California's climate as a whole. Therefore, project-specific GHG emission disclosure, analysis and mitigation is vital to California meeting its climate goals and maintaining our climate.

B. The SEIR Project Modifications and Updated GHG Emissions Analysis is Incomplete.

The purported purpose of the SEIR is to address minor modifications to the proposed Project in response to the Superior Court ruling finding the Project violated CEQA and a subsequent settlement agreement between the Project proponent and Climate Resolve. The SEIR goes into detail about all the portions of the original EIR that the Superior Court upheld but fails to fully address the deficiencies the Superior Court also found within the original EIR, including, in particular, the inadequate GHG emissions mitigation. Most importantly, and as described above, the SEIR appears to ignore that the Superior Court decertified the entire EIR. Accordingly, before moving forward with a modified project, the County must prepare and circulate for public review a revised EIR that complies with CEQA. (*See, e.g., King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 901.) Therefore, the limited scope of the SEIR is improper and inadequate if the County intends for this updated document to fulfill its obligations under CEQA. The conservation groups urge the County to include a comprehensive, robust analysis of the Project's potential impacts based on current environmental data and up-to-date scientific studies prior to moving forward with review of the proposed modification of the Project. (See Pub. Resources Code § 21082 [lead agencies must reflect their independent judgement when evaluating projects].)

Nonetheless, even under the improperly limited scope and purpose of the SEIR, the new information and associated documents are incomplete and inadequate. The SEIR repeatedly refers to several different GHG emissions calculations including the 2019 FEIR estimate of 157,642 $MTCO_2E$/yr that was primarily based on analysis using a 2016 version of CalEEMod and supplemental studies in 2018. (SEIR 3.1-22-3.) The SEIR continues to rely on this analysis and methodology for estimating the Project's GHG emissions even though it is now almost 10 years old. Yet, confusingly, the SEIR also references other GHG emissions reductions targets, including a 500,000 MT/Year target without an explanation of how or why that number was included or its relevance to the proposed Project. (SEIR 2-11; 2-12; 3.1-34; Centennial CR Final Agreement Exhibit 3: Pg. 1.) The SEIR also refers at times to another estimate of GHG emissions of 223,501 $MTCO_2E$/yr because of a different estimate of likely EV adoption. (SEIR 3.1-35; 3.55 [referring to 223,501 MT CO2e/yr as "the conservatively adjusted value" of the Project's emissions].) These estimates, all of which are likely out-of-date, create uncertainty as to

what the current estimated Project's GHG emissions are before mitigation.

This is particularly concerning in light of changes in the regulatory landscape between at the time of the DEIR presentation and now, especially at the federal level. The SEIR discusses and appears to base some of its estimates of the Project's GHG emissions related to light-duty vehicle GHG emissions standards, heavy-duty engines and vehicle fuel efficiency standards on studies from 2021 and 2023 as well as on regulatory decisions made by the Biden administration. (SEIR 3.1-8.) However, the current Trump administration has taken a markedly different approach and has signaled rollbacks on GHG emission standards and fuel efficiency standards for vehicles. (*EPA Launches Biggest Deregulatory Action in U.S. History* https://www.epa.gov/newsreleases/epa-launches-biggest-deregulatory-action-us-history, last updated March 14, 2025.) Yet, the SEIR makes no mention of the Trump administration, in particular EPA administrator Lee Zeldin's recent steps to rollback regulations directly related to GHG emission reductions in America's vehicle fleet. The SEIR should be revised to include the most recent information about these changes in the regulatory environment, the potential impact on the Project's anticipated GHG emission and whether additional mitigation measures are needed as a result to ensure informed decision making by the County. (*Planning & Conservation League v. Castaic Lake Water Agency* (2009) 180 Cal.App.4th 210.)

C. The Enforceability of the Climate Resolve Settlement Agreement Remains Unclear.

The SEIR repeatedly refers to the CR settlement to describe the changes to the proposed Project since the 2019 FEIR and claims that the CR settlement obligations will result in significant GHG emission reductions. (DEIR 3.1-56.) While measures included in the CR settlement represent positive steps and reflect many of the recommendations the conservation groups raised during the prior administrative process for this Project, questions remain about the enforceability of the CR settlement terms. It is unclear whether those obligations are simply features of the project or are meant to serve as binding mitigation measures for the Project's anticipated GHG emissions that would be *enforceable by the County*. Without additional assurances in place, the Project cannot claim, nor can the public rely on the claim that the Project will achieve net-zero GHG emissions.

CEQA requires that mitigation measures must be "fully enforceable through permit conditions, agreements, or other measures" so "that feasible mitigation measures will actually be implemented as a condition of development." (*Federation of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261.) Project design features are different with different legal requirements and obligations. (*Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645.) Specific measures that are intended to avoid or minimize environmental effects are properly considered mitigation

measures, and an EIR cannot shortcut CEQA requirements by simply incorporating such measures into the project design itself. (*Id.)* This process is important because it ensures that the analytical route…traveled from evidence to action" by agency is fully disclosed. (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502.) It also ensures that when several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. (Guidelines § 15125.4(a)(1)(B).) Most critically, mitigation measures, unlike project design features, must be fully enforceable and cannot be impermissibly deferred. (Guidelines § 15126.4, subd. (a)(2); *Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 476, 506, 520.).)

If the CR settlement obligations are now potentially project design features of the Project rather than mitigation measures under CEQA, the public cannot be assured that those obligations will be fully met. Per the terms of the settlement agreement, Tejon's obligations to implement the GHG emission reductions is contingent on Climate Resolve performing certain obligations, and upon Climate Resolve's compliance with an extremely expansive and restrictive non-opposition clause. (Centennial CR Final Agreement Exhibit 3: pp. 16-18.) There appears to be no commitment in the SEIR incorporate the CR settlement into a County-approved Mitigation Monitoring and Reporting Program (MMRP), which is the legally binding mitigation program recognized under CEQA. (Pub. Resources Code § 21081.6, subd. (a)(1).) The conservation groups urge the County to incorporate the GHG emissions reduction measures in the CR settlement and repeatedly referred to in the SEIR into a binding, enforceable MMRP before allowing the Project to move forward.

D. The SEIR Lacks Adequate Information About Other Potential Mitigation Measures and Modifications to the Project.

Lastly, while the inclusion of battery storage and microgrid technology could have beneficial impacts, more information is needed about how, when, and where those technologies would be used. (SEIR atm2-2.) The current information in the SEIR is insufficient for the public to understand the benefit those features would provide, any amount of reduction in the Project's harmful environmental impact, and whether they would cause any negative environmental impacts. More information is needed to ensure that members of the community and public decisionmakers are fully informed of the Project's potential impacts as required by CEQA. (*Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935; *City of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 901.)

Conclusion

Thank you for the opportunity to comment on the SEIR. The California Native Plant Society and Center for Biological Diversity look forward to the County's

recirculation of this document and to their continued participation in the processing of this Project.

Sincerely,

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August 13, 2026

Via Electronic Mail and Overnight Mail
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Re: Preliminary Comments on the Recirculated Partial Draft Environmental Impact Report (RPDEIR) for the Centennial Specific Plan Project (SCH Number 2024031142)

Dear Mr. Sackett:

We are writing on behalf of Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA") to provide preliminary comments on the Recirculated Partial Draft Environmental Impact Report ("RPDEIR") prepared by the Los Angeles County Department of Regional Planning ("County") for the Centennial Specific Plan Project (SCH Number 2024031142) ("Project").

The Project involves the development of a 12,323-acre community with 19,333 residential units, 1,034,550 square feet ("sf") of commercial uses, approximately 7,363,818 sf of business park uses, as well as recreational/entertainment, and institutional/civic uses.[1] The Project includes open space, parks, schools, utilities, and infrastructure to support the proposed land uses and future residents based on zoning and development standards outlined in the Centennial Specific Plan.[2] The Project was the subject of the Final Centennial Specific Plan Project Environmental Impact Report (SCH No. 2004031072) ("Centennial EIR").[3] In June 2025, the Second District Court of Appeal held, in *Center For Biological Diversity et al. v. County of Los Angeles et al.*,[4] that the Centennial EIR failed to comply with CEQA because (1) it improperly applied the state cap-and-trade program to the Project GHG emissions analysis and mitigation,

B.5-1

[1] RPDEIR, p. 1-4.
[2] *Id.*
[3] RPDEIR, p. 1-1.
[4] *Center For Biological Diversity et al. v. County of Los Angeles et al.* (2025) 112 Cal.App.5th 317.

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and (2) its analysis of the wildfire risks associated with the Project's off-site infrastructure improvements lacked sufficient detail.[5] The Centennial EIR was decertified in its entirety.[6] The Project proposes two new changes to the original Centennial Specific Plan Project: the Project would add local microgrid electrical distribution systems as a permitted land use, and the Project proposes to dedicate a majority of the Cement Road Realignment as a public road to improve fire resiliency.[7] The County's RPDEIR also contains revisions to the Climate Change, Wildfire, Biological Resources, and Cumulative Impact analyses.[8]

B.5-1 Cont.

The Court of Appeals identified several specific flaws in the Centennial EIR that must be corrected. Additionally, CEQA requires recirculation of a Draft EIR when significant new information is introduced after the public comment period.[9] Significant new information requiring recirculation can include information of new or substantially worse environmental impacts, feasible impact-reducing alternatives rejected by proponents, or the Draft EIR had fundamental inadequacies that prevented meaningful public review.[10] The proposed changes in the Project constitute significant new information.

CREED LA conducted a preliminary review of the RPDEIR and identified ongoing violations of the California Environmental Quality Act[11] ("CEQA") requiring further revision and recirculation of the RPDEIR.[12] First, the RPDEIR introduces microgrid electrical distribution systems as a permitted land use under the Centennial Specific Plan, but fails to adequately describe or analyze this new use. In particular, the RPDEIR fails to disclose new or substantially more severe environmental and public safety impacts resulting from installation and operation of the proposed microgrid electrical distribution systems.

B.5-2

Second, the RPDEIR fails to evaluate whether there would be new or substantially more severe impacts on biological resources due to new fuel modification requirements not in existence when the Centennial EIR was prepared. The RPDEIR also fails to analyze whether there were changes in the environmental setting. Moreover, the County lacks substantial evidence to support its assessment

[5] RPDEIR, p. 1-2.
[6] RPDEIR, Appendix B.
[7] *Id.* at 1-5.
[8] RPDEIR, p. 1-3.
[9] 14 Cal. Code Regs. ("CCR") § 15088.5.
[10] 14 CCR § 15088.5(a).
[11] Pub. Res. Code ("PRC") §§ 21000 et seq.; 14 CCR §§ 15000 et seq.
[12] PRC § 21100 et seq.

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of the current severity of biological resources impacts because the County relies on outdated biological surveys conducted between 1999 and 2015.[13]

As a result of these flaws, the RPDEIR lacks substantial evidence to support its conclusions, fails to proceed in a manner required by law, and fails as an informational document. CREED LA urges the County to remedy the deficiencies in the RPDEIR by preparing a legally adequate revised RPDEIR and recirculating it for public review and comment.[14] CREED LA reserves the right to supplement these comments at later hearings on this Project.[15]

B.5-2 Cont.

I. STATEMENT OF INTEREST

CREED LA is non-profit organization formed to ensure that the construction of major urban projects in the Los Angeles region proceeds in a manner that minimizes public and worker health and safety risks, avoids or mitigates environmental and public service impacts, and fosters long-term sustainable construction and development opportunities.

The organization's members include Sheet Metal Workers Local 105, International Brotherhood of Electrical Workers Local 11, Southern California Pipe Trades District Council 16, and District Council of Iron Workers of the State of California, along with their members, their families, and other individuals who live and work in Los Angeles County. Accordingly, they would be directly affected by the Project's environmental and health, and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist on site.

B.5-3

CREED LA has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

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[13] Letter from CDFW to County re RPDEIR (August 7, 2026), p. 7.
[14] We reserve the right to supplement these comments at later hearings on this Project. Gov. Code § 65009(b); Public Resources Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199–1203; *see Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121.
[15] Gov. Code § 65009(b); Public Resources Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199–1203; *see Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121.

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CREED LA supports the development of residential, commercial, mixed use, and office projects where properly analyzed and carefully planned to minimize impacts on public health, climate change, and the environment. These projects should avoid adverse impacts to air quality, public health, climate change, noise, and traffic, among other impacts, and must incorporate all feasible mitigation to ensure that any remaining adverse impacts are reduced to the maximum extent feasible. Only by maintaining the highest standards can commercial development truly be sustainable. B.5-3 Cont.

II. THE RPDEIR FAILS TO COMPLY WITH CEQA

A. The RPDEIR Fails to Adequately Describe New Microgrid Uses, Which May Result In New or Substantially More Severe Environmental Impacts

The RPDEIR introduces microgrid electrical distribution systems as a new land use under the Centennial Specific Plan to serve the Specific Plan Area with renewable energy generated on-site in support of the Project's "Net Zero" GHG program.[16] The use of microgrids to support renewable energy is a laudable use. However, microgrid systems employ various energy sources, including fuel cells, battery storage, and generators.[17] If these systems are not properly installed, maintained or monitored, they can create significant risk of upset, including fires and public safety hazards.[18] The RPDEIR fails to describe the types of microgrid systems that would be authorized under the Project's new land use category or specify the design standards applicable to these systems.[19] The RPDEIR also fails to establish limitations on the size of these systems. This fails to meet CEQA's standards for an adequate project description, rendering the entire analysis inadequate. B.5-4

California courts have held that "an accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR."[20] CEQA requires that a project be described with enough particularity that its B.5-5

[16] RPDEIR, p. 1-4.
[17] See e.g. Microgrid Safety: A Critical Element of Sustainable Energy, available at https://www.ul.com/resources/microgrid-safety-critical-element-sustainable-energy.
[18] *Id.*
[19] RPDEIR, p. 1-5.
[20] *Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 17; *Communities for a Better Environment v. City of Richmond* ("*CBE v. Richmond*") (2010) 184 Cal.App.4th 70, 85–89; *County of Inyo v. City of Los Angeles* (3d Dist. 1977) 71 Cal.App.3d 185, 193.

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impacts can be assessed.[21] Without a complete project description, the environmental analysis under CEQA is impermissibly limited, thus minimizing the project's impacts and undermining meaningful public review.[22] Accordingly, a lead agency may not hide behind its failure to obtain a complete and accurate project description.[23]

B.5-5 Cont.

Here, the failure to describe the types of facilities authorized by this new permitted land use category precludes accurate assessment of the Project's public health, public safety, and hazards impacts associated with implementation of the Project's renewable energy mitigation. The public and decisionmakers cannot evaluate the hazards and wildfire risks of these systems without information regarding what technologies would be permitted. For example, microgrids can include battery energy storage systems ("BESS"). Battery malfunctions can result in the release of toxic materials and/or the release of a flammable gas mixture and subsequent flammable gas vapor cloud with subsequent fire or explosion.[24] But the nature and severity of toxic pollutants emitted from battery malfunctions are particularly dependent on the battery type.[25] The RPDEIR asserts that the addition of microgrids to the Project is "not expected" to result in additional hazards risk, air emissions or other impacts not otherwise accounted for in the original Centennial EIR.[26] However, the RPDEIR lacks critical detail about the proposed microgrids' design, components, installation and operation that is necessary to accurately assess its impacts. The RPDEIR's general assertion that the microgrids will comply with California Fire Code standards[27] is not adequate to comply with CEQA or to describe or analyze this critical Project component.

B.5-6

[21] 14 CCR § 15124; *see Laurel Heights Improvement Assn. v. Regents of Univ. of Cal ("Laurel Heights I")* (1988) 47 Cal.3d 376.
[22] *Id.*
[23] *Sundstrom v. County of Mendocino* ("*Sundstrom*") (1988) 202 Cal.App.3d 296, 311.
[24] NFPA, Battery Energy Storage Hazards and Failure Modes (December 3, 2021) https://www.nfpa.org/news-blogs-and-articles/blogs/2021/12/03/battery-energy-storage-hazards-and-failure-modes.
[25] City of Goleta, Hazard Risk Assessment for Hazards Analysis and Risk Assessment for Greenbark 30 Battery Energy Storage Project, Goleta, California, p. 12, Table 2, available at https://www.cityofgoleta.org/your-city/planning-and-environmental-review/ceqa-review/greenbark-30-battery-energy-storage-system-project#docaccess-46e6c9378a0ec1b4b312aa491e665c3c.
[26] RPDEIR, p. 1-5.
[27] RPDEIR, p. 2.3-15.

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Some microgrids also include diesel generators.[28] Generators can emit criteria air pollutants, greenhouse gases, and toxic air contaminants,[29] and can significantly impact public health through diesel particulate matter ("DPM") emissions.[30] Thus, adding microgrids as a permitted use may result in greater greenhouse gas ("GHG") and other air quality impacts than previously analyzed. B.5-7

Without basic information regarding the proposed design and *scale* of microgrids permitted under the Specific Plan, the severity of these systems' risks cannot be assessed. The RPDEIR must be revised to clearly describe what microgrid uses would be authorized by the Specific Plan, and to analyze their new impacts. B.5-8

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[28] Pacific Northwest National Laboratory, Are Microgrids a Key to Grid Resiliency? (December 2, 2021), https://www.pnnl.gov/news-media/are-microgrids-key-grid-resiliency.

[29] SCAQMD, Fact Sheet on Emergency Backup Generators, http://www.aqmd.gov/home/permits/emergency-generators ("Most of the existing emergency backup generators use diesel as fuel").

[30] California Air Resources Board, Emission Impact: Additional Generator Usage Associated with Power Outage (January 30, 2020), available at https://ww2.arb.ca.gov/resources/documents/emissions-impact-generator-usage-during-psps (showing that generators commonly rely on gasoline or diesel, and that use of generators during power outages results in excess emissions); California Air Resources Board, Use of Back-up Engines for Electricity Generation During Public Safety Power Shutoff Events (October 25, 2019), available at https://ww2.arb.ca.gov/resources/documents/use-back-engines-electricity-generation-during-public-safety-power-shutoff ("When electric utilities de-energize their electric lines, the demand for back-up power increases. This demand for reliable back-up power has health impacts of its own. Of particular concern are health effects related to emissions from diesel back-up engines. Diesel particulate matter (DPM) has been identified as a toxic air contaminant, composed of carbon particles and numerous organic compounds, including over forty known cancer-causing organic substances. The majority of DPM is small enough to be inhaled deep into the lungs and make them more susceptible to injury. Much of the back-up power produced during PSPS events is expected to come from engines regulated by CARB and California's 35 air pollution control and air quality management districts (air districts)"); University of California, Riverside Bourns College of Engineering—Center for Environmental Research and Technology, Air Quality Implications Of Backup Generators In California, (March 2005), pg. 8, available at https://citeseerx.ist.psu.edu/document?repid=rep1&type=pdf&doi=84c8463118e4813a117db3d768151a8622c4bf6b; South Coast AQMD, Fact Sheet on Emergency Backup Generators ("Emissions of Nitrogen Oxides (NOx) from diesel-fired emergency engines are 200 to 600 times greater, per unit of electricity produced, than new or controlled existing central power plants fired on natural gas. Diesel-fired engines also produce significantly greater amounts of fine particulates and toxics emissions compared to natural gas fired equipment."), available at http://www.aqmd.gov/home/permits/emergency-generators#Fact2.

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B. The RPDEIR Fails to Analyze New Hazards and Wildfire Risks from Microgrids

The RPDEIR asserts that microgrid electrical distribution systems authorized by the revised Specific Plan could not result in new or substantially more severe environmental impacts than previously analyzed.[31] However, the RPDEIR fails to support this assertion with substantial evidence, making only conclusory statements.[32]

B.5-9

For example, microgrid electrical distribution systems containing BESS's can experience battery cell malfunctions resulting from thermal runaway reaction or external impact events.[33] Battery cell malfunctions can result in fires and explosions.[34] In the event of a battery cell malfunction, such as a thermal runaway reaction or external impact event, the Project could emit hazardous pollutants to the atmosphere, impacting public health and the environment.[35] Introducing numerous new microgrids to the Specific Plan area without adequate analysis and mitigation may place hazards in the direct path of the Project's new communities, and would impact local fire services in the event of an emergency.

These risks are not discussed in the RPDEIR. In particular, the fire services analysis has not been revised to address whether the new land use would significantly increase demand for fire services, and the wildfire analysis has not been revised to address whether the new land use would increase wildfire risks. Due to these omissions, the RPDEIR fails as an informational document and lacks substantial evidence to conclude that there would not be new or substantially more severe impacts.

B.5-10

[31] RPDEIR, p. 1-5.
[32] *Id.*
[33] NFPA, Battery Energy Storage Hazards and Failure Modes (December 3, 2021) https://www.nfpa.org/news-blogs-and-articles/blogs/2021/12/03/battery-energy-storage-hazards-and-failure-modes.
[34] NFPA, Environmental Impact of Lithium-Ion Battery Incidents Compared to Other Common Incidents (October 1, 2025) https://www.nfpa.org/education-and-research/research/fire-protection-research-foundation/projects-and-reports/environmental-impact-of-li-ion-incidents-compared-to-other-types-of-fires.

[35] *Id.*

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C. The RPDEIR Fails to Analyze Potentially Significant Impacts on Biological Resources Due to New Wildfire Measures

The RPDEIR identifies new wildfire mitigation measures and regulatory requirements that supersede those identified in the Centennial EIR.[36] Per California Assembly Bill 3074 (2020) (AB 3074) and updated LA County regulations, all structures within the project area are now bound to a mandatory 5-foot Ember-Resistant Zone (Zone 0).[37] This requires the total elimination of all organic landscaping, shrubs, and native vegetation within 5 feet of any residential eave, deck, or structural element.[38] These measures will clearly improve fire safety and public safety, and will aid in critical fire prevention. However, clearing substantial amounts of vegetation may also have adverse direct and indirect effects on local wildlife and their habitat which must be considered. The impacts of this measure on biological resources were not analyzed in the Centennial EIR.

Based on discussion in the RPDEIR, it is apparent that impacts on biological resources from this measure are potentially significant. When Zone 0 fuel modification is applied to thousands of acres of development, this continuous, non-combustible hardscape may eradicate valuable habitat along the urban-wildland interface. The RPDEIR provides no evaluation of how this extensive biological clearing alters habitat, foraging, or wildlife movement. The RPDEIR should be revised and recirculated to address the impacts of new wildfire mitigation on biological resources.

B.5-11

III. CONCLUSION

For the reasons discussed above, the RPDEIR for the Project remains inadequate under CEQA. It must be revised and recirculated to provide legally adequate analysis of, and mitigation for, all of the Project's potentially significant impacts resulting from recent changes to the Project. Until the RPDEIR has been revised and recirculated, as described herein, the County may not lawfully re-approve the Project.

B.5-12

[36] RPDEIR, p. 2.3-158 (MM WILD-2 Fuel Modification Plan supersedes 2019 EIR MM 3-9, and requires compliance with modern LA County regulations).
[37] RPDEIR, p. 2.3-23.
[38] *Id.*

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Thank you for your attention to these comments. Please include them in the record of proceedings for the Project.

B.5-12
Cont.

Sincerely,



Aidan P. Marshall

APM:acp

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Outlook

Fw: inquiry regarding apn 3275 008 003 withing the county project.

From Jodie Sackett <jsackett@planning.lacounty.gov>
Date Mon 6/8/2026 7:26 AM
To Nathan Keith <nkeith@tejonranch.com>
Cc Jessica Hitchcock <jessica.hitchcock@psomas.com>; Joshua Huntington <jhuntington@planning.lacounty.gov>

Good morning Nathan,

We received a comment regarding the RPDSEIR, please see below.

Since this also seems to be an inquiry for County Planning, I will be providing a brief reply regarding the items mentioned below.

Best,

JODIE SACKETT
SENIOR PLANNER
O: (213) 974-6433 | D: (213) 893-7409
general questions: subdivisions@planning.lacounty.gov
case inquiries: jsackett@planning.lacounty.gov

From: Jennifer Lim <jennlim7@gmail.com>
Sent: Friday, June 5, 2026 9:12 AM
To: Jodie Sackett <jsackett@planning.lacounty.gov>
Subject: inquiry regarding apn 3275 008 003 withing the county project.

CAUTION: External Email. Proceed Responsibly.

Dear Centennial Project Planning Team.

I am writing as the property owner of apn 3275-008-003 which boundaries of the Centennial Specific Plan project area.

As a perty owner attending the public hearing, i would like to exact status and designated land use of my specific parcel under the Partial Draft Environmental impact (RPDEIR).

C.1-1

Could you please clarify the following information regarding my lot apn 3275 008 003.

1. What is the specific zoning or designated land use for my parcel
(e.g., residential, commercial, open space, infrastructure/ roadway)

2. is my parcel subject to any upcoming land acquisition or easement project developer(Tejon Ranch)?

3. How can i Review the specific map overlay that shows my parcel project layout?

Thank youfor your assistance, and i look forward to your guidance.

Sincerely.

Myong Hwa llm.
213 -476-5887

once again thank you.

C.1-1
Cont.